



November 18, 2009

Ms. Chandra Wallar
Deputy Chief Administrative Officer
County of San Diego
1600 Pacific Highway
San Diego, CA 92101

Dear Ms. Wallar:

This letter is on behalf of the San Diego Regional Chamber of Commerce and the San Diego Regional Development Corporation (EDC). We appreciate the extraordinary effort the County has undergone to prepare the General Plan Update (GPU) as well as all the associated documents. While we are optimistic and ultimately support finalizing the General Plan Update, we continue to have concerns about key policy elements of the plan. This letter focuses on three core issues that remain a concern and provides recommendations to address these policy issues.

- 1. Lack of an Economic Vision:** The draft GPU excludes any discussion of economic development entirely, disregarding the region's future employment and economic prosperity.
- 2. Application of Reduced Regional Population and Housing Forecast:** The draft GPU is not based on the most recent SANDAG population forecasts, with a difference of approximately 40,983 residents and approximately 14,000 housing unit short fall. Moreover, the draft GPU's current wording makes it difficult to achieve much of the housing that is theoretically planned for in the document.
- 3. Limited public infrastructure needs of existing and future residents:** The draft GPU does not provide adequate infrastructure to meet future needs and does not contain needed flexibility in addressing fire, water and wastewater issues.

Economic Development

We firmly believe that in order for the region to develop an internationally competitive and sustainable economy, it is vital that long-term planning tools provide sound economic development strategies and policies and include consideration of economic development and vitality as part of the relevant analysis. The County's draft General Plan Update has failed to consider Economic Development, raising concerns about our region's ability to compete nationally and globally if the resulting GPU is implemented. The lack of economic consideration places the County -- and the region as a whole -- at a competitive disadvantage. We believe the inclusion of an economic development framework and consideration of economic development factors is critical to our region's economic prosperity and future growth. We strongly recommend that the General Plan include such consideration and analysis, and identify a viable economic development framework for the unincorporated area.

Additionally, the draft policies in Section LU-11 of the Land Use Element do not contain an economic vision for commercial, office and industrial development in the County, nor does the draft GPU contain any jobs/housing balance. Some communities support significant employment uses but lack the housing necessary to support these jobs, leading to workers being forced to commute in and out of these communities, which is inconsistent with the purpose and intent of SB 375.

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The communities East of the County Water Authority Boundary are being substantially down-zoned in the proposed GPU, and the document's failure to include any jobs/housing balance in these communities leads to the potential for socio-economic decline which could lead to physical impacts (blight), unsustainable non-residential land uses (jobs/housing imbalance), and larger traffic and greenhouse impacts. Therefore, we recommend that the GPU:

- Ensure land use plans reach target job-to-housing ratio of 1.5 to 1.
- Emphasize opportunities for commercial, industrial and office development throughout the County and ensure that land use policies facilitate rather than constrain economic development in these areas.
- Analyze all impacts of the proposed down-zoning on the communities east of the County Water Authority Boundary.

Regional Housing Needs

The draft General Plan Update does not adequately plan for population and housing growth forecasted in our region for two main reasons:

1. As written, the draft GPU consistently defers to the community plans to establish what density ranges and uses are acceptable. While the draft GPU could theoretically accommodate the 2030 SANDAG growth projections and Regional Housing Needs Assessment (RHNA) requirements, there is no commitment or requirement placed upon the community plans to ensure that such will occur. Language should be added to the Land Use and Housing Elements ensuring that the community plans will include adequate housing.
2. The draft GPU is not based on the most recent SANDAG population forecasts. Instead of ensuring that this population (which is mostly our children) is adequately housed, the document simply increases the number of people per household. Whether this was done by SANDAG or the County is irrelevant when no thought is given as to increased need for public infrastructure, public facilities or loss of revenue.

Our organizations recommend that the County ensure that the Land Use Element will meet the Regional Housing Needs Allocation through a combination of adding appropriate language in the draft GPU, deleting language that could preclude development of the planned-for housing, and implementing land use intensities that meet SANDAG's long-term regional share of new housing construction -- 300,000 new units (region-wide) by 2030 and 450,000 new units by 2050.

On a related note, the draft GPU provides virtually no new densities in current country towns and relies exclusively on the development of existing parcels, many of which are unbuildable and/or underdeveloped. Without reasonable density in the undeveloped properties, there is no economic incentive for private investment to create either jobs or housing opportunities. To help address this issue, we recommend that the County concurrently adopt implementing ordinances that allow clustering & density bonus incentives.

We further believe that the language in the GPU encouraging maintaining community character could discourage any change, including an increase in density. The General Plan policy framework must govern the Community Plans, not the other way around.

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Policies that restrict future amendments beyond that mandated by the State should be eliminated. The Land Use Element must be flexible to respond to the mandates of SB 375 in the short term, and to constantly changing societal needs in the long term. Finally, no element of the General Plan should tie the hands of future Boards of Supervisors.

The GPU should avoid establishing specific regulatory or policy statements that could be interpreted or enforced as regulatory requirements, especially when either different or no such regulatory requirements exist today. (For example: LU-11.5/Large-Format Retail Stores. Allow large-format retail uses, typically referred to as "big box stores," only where the scale of the use and design is compatible with the surrounding areas. Large-format retail typically means retail stores with floor plans that are larger than 65,000 sq. ft. Our organizations question whether the County Board of Supervisors has taken action on such policy.)

Public Infrastructure

The County General Plan Mobility Element *is not* governed by the infrastructure needs of existing and future residents.

We offer the following recommendations:

- Ensure that the County's General Plan Mobility policies allow population and job growth to drive land use planning which will then drive infrastructure planning.
- Prohibit infrastructure planning from leading future development. This planning method limits job growth and curtails economic development within the County.
- Ensure commitment to Infrastructure/Transportation:
 - The General Plan should not plan for roads to fail.
 - The General Plan should not allow roads to be eliminated.
 - The General Plan should expand its focus on transportation corridors and transportation networks and take under consideration realistic transportation modes – not just transit - in order to reduce greenhouse gas emissions.

Our organizations believe that the County General Plan Update needs to support population and job growth in the County and provide an easily understood vision to guide growth that meets the future housing and employment needs in the unincorporated communities in the coming years.

We believe our recommendations will achieve that goal and we encourage you to take them under consideration.

Sincerely,



Ruben Barrales
President & CEO
San Diego Regional Chamber of Commerce



Andrew Poat
Vice President, Policy
San Diego Regional EDC

cc: Members, County Board of Supervisors