



*Targeting Waste • Promoting Efficiency*

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August 28, 2009

Mr. Devon Muto  
Chief, Department of Planning and Land Use  
County of San Diego DPLU  
5201 Ruffin Road, Suite B  
San Diego, CA 92123

Re: Comments on the General Plan Update draft EIR

Dear Mr. Muto:

The San Diego County Taxpayers Association is a nonprofit, nonpartisan organization dedicated to promoting accountable, cost-effective, and efficient government. We have several concerns with components of the Draft General Plan Update that impact the financial and environmental future of the County that we would like addressed within the Environmental Impact Report. They include the following:

1. **Inconsistency with SANDAG's Growth Forecast:** SANDAG's Preliminary 2050 Regional Growth Forecast shows that the region will continue to see an increase in population, which will in turn create an ongoing demand for housing units. SANDAG recognizes this and anticipates that the region will only have 84% of the available housing units available for its population. This is of significant concern since the General Plan Update drastically reduces density in much of the undeveloped area that could house much of this anticipated increase in population.
2. **Public Maintenance of Land:** With conservation-mandated proposals, questions arise concerning the public and private maintenance of that land. Without incentives in place to encourage developers to provide land as mitigation and maintain it privately themselves, how does the County anticipate it can financially accomplish this goal?
3. **Additional Pressure Exerted on Infrastructure and Schools:** Lowering densities in areas currently not developed may achieve conservation goals. However, increasing densities in areas with higher densities has other consequences such as traffic and pressure on existing schools and infrastructure.
4. **Property Values and Property Taxes Negatively Impacted:** The General Plan Update does not take into account economic impact, which is especially critical when further restricting land use. Reduction in the General Plan-designated densities can lower property values. This is of concern since many use their land as equity. There are parts of the "backcountry" that have had their densities reduced ten times from the existing General Plan

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to the “update.” In addition to lowering property values, property tax revenue may also be negatively impacted. The County might be cutting itself off from future property tax revenue that could occur from developments and land sales. Additionally, restricting land development can be an impediment to economic growth.

5. **Inconsistency with the MSCP and General Plan:** The Multiple Species Conservation Program and the General Plan may have results contrary to the goals of both. Since the MSCP requires a specifically designated portion of mitigation land, and the General Plan requires lowering of densities, land may not be there for mitigation—which will ultimately require the County to enter the business of purchasing land *and* maintaining it.
6. **Limits Tax Revenue From Transregional Commuters:** There are many people that are considered transregional commuters—people who work in San Diego but live in Mexico, Riverside County, and Imperial County. By limiting future housing, the County is limiting the ability to draw in their tax dollars if they elect to live closer to work—which may occur if gas prices escalate again.

As previously stated, these are all elements that we believe are critical to the financial and environmental health of the County, and SDCTA would like each matter addressed. Please do not hesitate to contact us if you have any questions or concerns. I can be contacted at 619-234-6423 or via email at [joanne@sdcta.org](mailto:joanne@sdcta.org).

Thank you in advance.

Sincerely,

JoAnne Golden  
Policy Analyst