Mayor Duman and City Council Members,

Care4Suffolk is a grassroots organization made up of individuals from all over Suffolk who have concerns about land use issues.

A comprehensive plan is supposed to serve the needs and desires of a city's citizens. However, the Suffolk 2045 Comprehensive Plan is heavily influenced by the expansion of the Port of Virginia and its importance to the region. It focuses on the Port's needs and the desires of the developers. It does not reflect the comments provided by the public during the online and in person engagement sessions.

It is clear that the 2045 Plan is all about the Port. Even a Planning Commissioner admitted that this plan is about the Port of Virginia. The expanded growth areas are to allow for more warehousing and residential development that are needed by the Port. The recent State of the Region Report acknowledges the Port's need for this and it was also a "key takeaway" from the comp plan Focus Group on housing.

However, residential land use is a loss to a city when you compare revenue received versus costs of services for citizens. On average for each \$1 brought in from residential taxes, the City spends about \$1.10 on Costs of Services (roads, schools, utilities, libraries, emergency services, and other infrastructure and services). Residential development must be well balanced with commercial and industrial development. Warehousing and distribution have some of the lowest revenue potential compared to manufacturing and commercial, yet the costs of services (namely repairing and replacing roads) is quite high. If the City had completed the Fiscal Impact Analysis (FIA), they would have seen this picture more clearly, as many municipalities throughout the country have seen.

Instead, city staff claimed an FIA wasn't necessary for two reasons. The first was that Suffolk isn't changing its growth approach. There was no FIA done for the 2035 comp plan either, so this current growth approach has not actually been proven by data to be fiscally sound, yet the City persists with it. The second reason given was that the FIA is done at the site level for rezonings. However, at the site level, the FIA is done by the developer and does not include the Costs of Services. Without the Costs of Services component, it is just the developer selling an idea about how much money the City will collect in taxes. But will those taxes pay for the services used? An actual FIA is supposed to show that.

Some council members said it was unreasonable to expect a developer to provide this data. This is why it is crucial for the City to conduct the FIA itself during this comprehensive plan process, which is what was supposed to happen. Without the FIA, the City could be encouraging development that will actually burden the taxpayers for years to come. The citizens asked for a comprehensive plan that would protect their quality of life, maintain that small town feel, fix the traffic issues, preserve farmland, limit warehouses, provide safe/walkable communities, focus on developing downtown, and engage the public about their wants and needs. This plan does none of that.

Developers asked for expanded growth areas, an efficient and predictable review process, and the elimination of infrastructure costs. The City expanded the growth areas by more than any previous plan. Additionally, the City wrote in the Objectives:

L.1.2 Review and revise current development regulations, including the Unified Development Ordinance (UDO) and the zoning map, to improve compatibility with the comprehensive plan. (p.64 of 2045 Comprehensive Plan)

L.5.1 Identify priority economic development sites and make strategic investments to advance site readiness. (p.68 of 2045 Comprehensive Plan)

E.1.6 Strategically expand utility service (water, sewer, fiber) to sites that can support new employment generating businesses. Develop financing options to facilitate the construction of water and sewer projects to support development. Use City-funded utility capacity improvements as incentives for development. (p. 81 of 2045 Comprehensive Plan)

It is clear that this 2045 Comprehensive Plan is not about what was requested by citizens of Suffolk. It is designed to coordinate with regional objectives and goals that center around the Port of Virginia. A comprehensive plan is supposed to be focused on the city's citizens, not an outside entity.

We are respectfully asking you to vote 'NO' to this plan. Please do not put the wants of the Port over the needs of the citizens.

Sincerely, Care4Suffolk.org