

BIA San Diego Policy for General Plans and Community Plans

Board Adopted June 2007

The Building Industry Association of San Diego (BIA) believes that good planning is a critical element of good urban land use and development practice and generally supports each jurisdiction's effort to generate and update General Plans (and, where applicable, Community Plans) that are: clear, timely, supportive of good development practices, responsive to the needs of existing and future community members, and facilitate and promote responsible development.

To that end, the following policies are adopted as guidelines for its legislative committees and general members to consider and use in providing their input into the public process for and review of General Plan and Community Plan update efforts in the jurisdictions throughout San Diego County.

1. **General Plans should be drafted and updated in a comprehensive manner, with all elements adopted simultaneously.** The incremental adoption of specific elements ahead of others creates challenges with consistency, and may lead to contradictory or ambiguous directives between elements. Per State law and guidelines, General Plans are meant to be a comprehensive synthesis of a number of elements, and their effectiveness is lost when some elements (e.g. Housing or Transportation) are adopted in advance of updating other elements critical in their implementation (e.g. Land Use).

An exception to this approach may be appropriate with regard to jurisdictions, like the City and County of San Diego that use individual community plans as implementing guidance for the Land Use element of the General Plan. Were the BIA to discourage such updates, critical community-based modifications that are critical to BIA goals would be delayed or prohibited.

The BIA strongly discourages the update of single elements of General Plans without the corresponding updates in all other elements with the exception of Community Plan updates, as noted above.

2. **The General Plan shall provide for an adequate supply of developable land to meet the projected housing and employment needs beyond its planning horizon.** This land supply analysis should recognize that free-market conditions, timing, and other economic considerations will mean that all land with development potential may not be developed during the planning horizon, and should therefore include adequate additional supply to avoid upward price pressures due to supply limitation. The projected housing and employment needs analysis should be based on national and





regional population and in-migration projections, and should accommodate the municipality's fair share of housing for all prices and household income levels.

3. **Any project-level mitigation required by General Plans should have a direct nexus to the project's impacts.** General plans should specifically not require or encourage in any way that projects be required to provide more than their fair share contribution to addressing project impacts, or their fair share of infrastructure deficiencies. To do otherwise would place an unfair burden on non-homeowners and younger residents.
4. **General Plans should encourage long term and comprehensive mitigation strategies on a regional basis to provide a way to address cumulative project impacts.** Mitigation strategies should be developed to address large-scale regional issues such as transportation demands, open space protection, reducing carbon and other greenhouse gasses, and other similar issues impacted both by existing land use and new development. Funding mechanisms should be identified to allow projects to provide their fair-share mitigation based on their specific cumulative impact, but the burden of mitigation should be broadly shared by all impacting parties – not required of individual projects as ransom to proceed.
5. **General Plan elements should be consistent with each other.** Consistency between all elements is required for the successful and clear implementation of the plan. Notably, the requirement for each jurisdiction's Housing Element to provide housing to meet its allocation under the regional housing needs assessment should be respected when construing other plan elements.
6. **Zoning and other implementing ordinances shall be consistent with the General Plan and updated concurrently.**
7. **The General Plan Land Use element and resulting Zoning shall be based on "ground truthing".** Powerful GIS technology allows the collection and plotting of topographical, environmental, regulatory, development, and other information on a parcel by parcel basis. The development projections within the General Plan should be verified against this data prior to adoption of the plan to determine if the planned land supply can truly generate the development indicated in the plan after considering all physical and regulatory constraints.
8. **The General Plan should be based on market realities.** The General Plan's development projection must recognize that the realization of the land use plan is largely a function of the private market. In addition to appropriate allowances in land use projections for land supply that will remain off market, the General Plan should understand the cost and market implications of different building types and



densities and insure that attainable housing product can be delivered in the types and densities included in the General Plan. High-cost, high-density development with underground parking, extensive life-safety systems, and high cost of construction material should only be planned in those areas where the market pricing supports the additional cost. In other areas, density should be achieved using more affordable construction types.

9. **Impact Fees should be consistent with the adopted General Plan.** Updating impact fees based on new or differing assumptions from the General Plan is strongly discouraged. Impact Fee updates should be completed in concert with the General Plan.

10. **The General Plan should create realistic and achievable infrastructure funding methods.** The plan should create strategies for funding existing infrastructure deficits that do not require new development to cure existing problems. Methodologies should be employed to aggregating the impact fees from smaller and infill development projects to deliver phased, timely, and effective upgrades to infrastructure systems that do not hold projects hostage for their cumulative impacts, the mitigation of which would require improvements beyond the scope of the project.

The General Plan should specifically include strong commitments by the local jurisdiction to actively pursue all available sources of regional, state, and Federal funding for the development and construction of additional transit options (e.g. light rail, expanded trolley system, availability of bus rapid transit (BRT), etc.) to facilitated future transit oriented development.

The BIA strongly encourages the creation and use of broad-based funding mechanisms for infrastructure that would include special assessment districts, community facility districts, and redevelopment agency designation to develop the enabling infrastructure to support the General Plan goals.

11. **The General Plan should create land use designations that expressly streamline future approval processes.** General Plans can provide incentives for desired types of development and significantly decrease development costs by reducing timing and risk; streamlining the need for future approvals; and alleviating risk by expressly stating the intensity of development allowed and including policies that allow for minimal future discretionary action. CEQA already allows streamlined review in several of these situations, but too few local jurisdictions are taking advantage of these opportunities.

12. **The General Plan should provide a strong environmental (CEQA) analysis that allows the streamlining of future project-related CEQA documents.** The Programmatic Environmental Impact Report (PEIR) should include maximum analysis of the plans impacts and mitigation strategies to address cumulative impacts, growth inducement, and other required elements, so that future project



applications may tier off of these previously-approved documents and reduce future cost and processing time.

13. **The General Plan should recognize that most future development in the San Diego region will be smaller and infill in nature.** The General Plan should adequately focus on the differing types of development and ways that the jurisdictional area will accommodate future growth pressures.
14. **The General Plan should specifically encourage and allow growth in those areas where existing or planned transportation infrastructure and other services are, or will be, provided.** Efficient use of existing infrastructure and select investment in infrastructure enhancement in targeted areas should be encouraged by planning efforts. The adoption of different level of service thresholds for different types of areas should be considered (e.g. areas with high transit service should incorporate lower parking ratios and tolerate greater automobile traffic congestion to encourage transit use and recognize the role transit plays in the overall transportation objectives).
15. **The General Plan should provide flexibility for mingling of uses and the evolution of true mixed-use districts.** Co-location of employment and residential uses and the conversion of outdated employment uses to other uses should be encouraged where possible to create increased jobs/housing balance and reduce demands on transportation systems. The relevant policies should be flexible enough to allow evaluation of permitted uses on a case-by-case basis, recognizing that relatively sensitive uses will be more appropriate on some sites than others. The Plan should enable market-driven re-use of sites rather than to plan for revised uses that are not supportable by market forces.
16. **General Plans should create a balance between employment and housing land uses.** The Plan should be based on the current and planned role of the jurisdiction within the regional context, current uses and opportunities for growth and expansion, and the evolution of the nature of employment and housing uses as the region intensifies. Given the infrequent nature of plan updates, flexibility should be allowed to meet evolving market needs and the vibrant and changing economy of the San Diego region.
17. **General Plans should be regionally consistent, and meet regional needs.** Each jurisdiction must recognize its role in meeting the needs of the County. Plans should be consistent with neighboring jurisdictions, regional transportation systems, and regional smart growth initiatives (SANDAG Regional Comprehensive Plan).
18. **General Plans, as anticipated by state law, should be devoted to establishing general goals, objectives and policies.** The BIA should work diligently to discourage the inclusion of provisions and standards that are best implemented through jurisdictional policy initiatives, ordinance, or resolution. Broad policy

objectives should be specifically identified as such, and specific language should be included that the responsibility to formulate and implement policy is explicitly not the responsibility of each individual project. Vagueness or ambiguity that can lead to future misinterpretation or misapplication should be avoided. Instead, such efforts should be addressed through carefully considered ordinance or resolution, undertaken as separate action by policy makers.

19. **General Plans should avoid narrative editorializing or comments.** General Plans should be implemented through their specifically enumerated goals, objectives, and policies. Stray or idealistic General Plan narrative language that creates ambiguity, or presents an opportunity for project opponents to argue inconsistency, should be eliminated.

20. **Policy makers should recognize that General Plans need to evolve over time to take advantage of emerging opportunities and adjust to changing conditions.** Today's dynamic economy and changing development patterns require flexibility. The General Plan should specifically avoid language tying future decision makers from approving Specific or Precise Plans, or initiating General Plan Amendments. These processes provide a full and complete public process for consideration but also allow policy makers to respond to evolving public needs and to embrace new opportunities. For example, a policy for determining how and when general plan amendments may be sought by an applicant or whether certain entitlement permits, such as specific plans and precise plans, should not be included at the General Plan level.

