



Integration Concepts for General Plan Updates or Other Local Planning Activities

June 2020

Prepared by the California Governor's Office of Planning and Research (OPR), in collaboration with the California Department of Housing and Community Development (HCD).

This document outlines concepts for integrating various policy topics and new requirements in General Plan updates, housing element updates, or other local planning updates. The intent is to highlight opportunities that could help local agencies scope their planning efforts to meet new requirements more efficiently and effectively, and to help match integrated planning activities with grant programs or other funding opportunities that may become available.

Cities and counties in California are required to adopt, and periodically update, general plans that provide a vision and policy framework for how their communities will grow and change over time. As outlined in detail in the [General Plan Guidelines](#), several topical elements are mandatory and therefore must be included in the general plan, while various other optional elements or topics can also be included in the general plan.

In recent years, several bills were signed into law that require new elements or topical considerations be incorporated into general plans, or in other topically related plans that can be incorporated by reference into the general plan. Many of these new requirements are triggered by the next housing element update, and/or updates to other plans such as the Local Hazard Mitigation Plan (LHMP).

Additionally, the General Plan Guidelines highlight some topics that, while not required in the general plan per statute, may be addressed in the general plan or other planning documents to satisfy the requirements of the California Environmental Quality Act (CEQA).

Specific integration opportunities for the general plan elements and related planning documents are discussed below and summarized in the table that follows at the end of this document.

Safety Element Updates

- Many communities' safety elements must address the topic of **wildfire** following the next housing element update, pursuant to SB 1241 (2012).

- All communities must update their safety element to comprehensively address **climate adaptation and resilience** pursuant to SB 379 (2015) and SB 1035 (2018), along with **evacuation routes** per SB 99 and AB 747 (both 2019). These updates are triggered either by the next housing element update or local hazard mitigation plan (LHMP) update.
- Because there is considerable overlap across these new topical requirements in the safety element, local agencies may want to consider a more holistic approach to the safety element that addresses the new wildfire, evacuation routes, and climate adaptation and resilience requirements in an integrated manner, rather than as separate issues.
 - For example, the severity of wildfire hazards is now increasing because of climate change. Evacuation routes are becoming more critical to addressing increasing threats public safety under a range of emergency scenarios related to wildfire, inland flooding, coastal flooding and other hazardous events, all of which are growing in severity under climate change. Thus, a holistic safety element update can help address all the new requirements in an integrated manner while also avoiding preparing separate and potentially duplicative analyses.
- As communities consider the location and type of new housing or other land uses in relationship to known hazards and the effects of climate change on these hazards and relative increases in risk, updates to the housing element, land-use element, safety element, or other elements, may all need to be updated in a coordinated fashion to ensure that the general plan remains internally consistent across elements.
 - For example, potential changes in residential, mixed-use, or other land-use designations and associated policies or diagrams in the general plan land-use element can be analyzed along with potential changes in housing element policies and suitable sites and zoning pursuant to local regional housing needs allocation (RHNA) targets , and then compared to known hazards and potential increases in risk associated with climate change in the safety element. By coordinating updates to all three elements (land-use, housing, and safety), local agencies can direct future development into areas that avoid or reduce unreasonable risks while also providing needed housing and maintaining other community planning goals.
- The specific safety element update approach may vary considerably from jurisdiction to jurisdiction because local agencies may already have one or more separate stand-alone plans such as a LHMP, climate adaptation plan, emergency response plan, or similar plan that addresses one or more requirements. Because the statute typically allows separate plans to satisfy requirements (provided they are consistent with requirements in statute), incorporating one or more separately adopted plans by reference, along with any required updates to remove outdated information to make the safety element consistent with the newer plans, may be appropriate.
- For agencies that do not have separate stand-alone plans addressing these new requirements, a safety element update for these topics is still required.
- For more information, see the Safety Element section of Chapter 4 (Required Elements) and Appendix A in the General Plan Guidelines.

Environmental Justice

- Local agencies containing disadvantaged communities now must update their general plan to address the topic of environmental justice (EJ), either in a stand-alone element or as a cross-cutting topic across relevant general plan elements.
- The EJ element must address both existing issues as well as future growth and change in a community with respect to the location and type of housing, infrastructure, services, and disproportionate environmental burdens in disadvantaged communities.
- Because the EJ element must be developed when two or more general plan elements are updated concurrently, integration of EJ across those elements being updated as well as others that may address or support EJ is an opportunity to address the topic in tandem with other required updates to safety, housing, or other elements.
 - For example, updating housing element policies and programs (in combination with other elements, such as land-use or safety) to ensure a community's housing supply is adequate, affordable, safe and sanitary could be considered part of a local jurisdiction's commitment to environmental justice. Similarly, policies and programs protecting and safeguarding existing housing in at-risk areas could be part of a climate adaptation strategy in the safety element that also addresses the needs of vulnerable and disadvantaged communities.
- For more information, see the Environmental Justice discussion in Chapter 4 (Required Elements) in the General Plan Guidelines. (Note: OPR will be releasing more detailed supplemental EJ guidance in the Summer of 2020).

Climate Change: GHG Emissions Mitigation + Climate Adaptation

- In addition to the climate adaptation requirements for the safety element, local agencies are encouraged to address the topic of greenhouse gas (GHG) emissions mitigation in one or more elements of the general plan.
- General plans shape the outcomes of a community's patterns for growth and change over time and associated GHG emissions profile, based on how land-use, housing, circulation, conservation, and open space are managed. When local agencies are updating one or more general plan elements, it may be appropriate to incorporate a GHG reduction strategy that can address and mitigate GHG emissions associated with new growth or changes in the community. A GHG reduction strategy can be incorporated into the general plan itself, or a separate stand-alone GHG reduction plan or climate action plan (CAP) could also be developed and incorporated by reference into the general plan.
- Policies and programs can reduce GHG emissions either directly or indirectly, while also addressing other community planning requirements.
 - For example, land-use or housing policies that focus growth in infill or transit-supportive areas such as transit-priority areas or encourage housing in transit-oriented development can lead to reductions in vehicle miles traveled (VMT) and GHG emissions while also avoiding conversion of natural and working lands to urban development.

- Similarly, circulation element policies or programs that require or encourage investments in active transportation projects that increase walking, biking, or taking transit can increase the viability of building affordable housing for households that are not automobile dependent, while also reducing VMT and GHG emissions.
- Policies requiring or encouraging green, energy efficient and zero-net energy building codes can lead to production of housing with improved indoor air quality and reduced operating costs, which addresses public health issues, reduces GHG emissions, and increases the resilience of lower-income households in a future with rising temperatures under climate change.
- As noted in Chapter 8 (Climate Change) of the General Plan Guidelines, the topic of GHG emissions mitigation is not a required general plan topic or element in statute. However, local agencies can address this topic in a manner that helps to meet the obligations of CEQA to determine the significance of GHG emissions from the general plan update and future growth in housing, jobs, and other economic activity and development consistent with the general plan.

General Plan Element	New Requirements and Applicability Criteria	Legislative and Statutory References	Triggers and Timing	Integrated Policy Concept Examples	Other Related Plans
Safety	<p>Wildfire: Safety element must be updated to address wildfire hazards and reduce unreasonable risks.</p> <p>Applies to jurisdictions with lands in the State Responsibility Areas or the Very High Fire Hazard Severity Zone in Local Responsibility Areas.</p>	<p>SB 1241 (2012)</p> <p>Gov't Code 65302(g)(3)</p> <p>Gov't Code 65302.5</p>	<p>Upon the next Housing Element update on or after 1/1/2014.</p>	<p>Land-Use, Housing and Safety elements: coordinated policies and programs across elements</p> <p>Fire-adapted communities policies and programs</p> <p>Develop resilient design guidelines for housing and other priority development types</p> <p>Develop, adopt and enforce overlay zones prioritizing safety and conservation in wildland areas, while also prioritizing housing development in lower-risk areas</p> <p>Wildfire risk reduction standards for new development in higher-risk areas</p>	<p>Local Hazard Mitigation Plan (LHMP)</p> <p>Community Wildfire Protection Plan</p> <p>Climate Action and Adaptation Plans</p>

				Home-hardening retrofit programs	
Safety	<p>Climate Adaptation and Resilience: Safety element must be updated to address climate change vulnerability, strategies for climate adaptation and resilience.</p> <p>Applies to all cities and counties.</p>	<p>SB 379 (2015)</p> <p>SB 1035 (2018)</p> <p>Gov't Code 65302(g)(4)</p>	<p>Upon the next LHMP update after 1/1/2017, or by 1/1/2022 if no LHMP adopted (SB 379)</p> <p>Upon the next Housing Element update + review and update upon future housing element updates (SB 1035)</p>	<p>Land-Use, Housing and Safety element: coordinated policies and programs across elements</p> <p>See also Wildfire examples above</p> <p>Extreme heat mitigation for housing in vulnerable communities</p> <p>Energy efficient housing and new development (see also GHG emission mitigation below)</p> <p>See the California Adaptation Planning Guide for detailed guidance on adaptation planning process and integrated policy examples</p>	<p>LHMP</p> <p>Climate Action and Adaptation Plans</p> <p>Resilience Plans</p>
Safety	<p>Evacuation Routes: Safety element must be updated to (1) identify all residential developments in hazard areas that do not</p>	<p>AB 747 (2019)</p> <p>SB 99 (2019)</p>	<p>Upon the next Housing Element update on or after January</p>	<p>Safety element, circulation element, land-use element: coordinated policies and programs that address evacuation</p>	<p>LHMPs</p> <p>Emergency Operations / Response Plans</p>

	<p>have at least two points of egress (SB 99); and, (2) the safety element must be reviewed and updated as necessary to identify evacuation routes and their capacity, safety, and viability under a range of emergency scenarios (AB 747).</p> <p>Applies to all cities and counties.</p> <p>(Note: regarding identification of residential developments without two points of egress, CAL FIRE is required to survey all local agencies to identify such developments and must prepare recommendations for local consideration to address these conditions, by July 1, 2021. The survey and recommendations must also be updated every 5 years by CAL FIRE. [AB 2911, 2018]).</p>	<p>Gov't Code 65302(g);</p> <p>Gov't Code 65302.15</p>	<p>1, 2020 (SB 99).</p> <p>Upon the next revision of a local hazard mitigation plan on or after January 1, 2022, or beginning on or before January 1, 2022, if a local jurisdiction has not adopted a local hazard mitigation plan (AB 747). Must also update evacuation routes upon next housing element update, at least every 8 years.</p>	<p>routes, ingress/egress issues for subdivisions, emergency communications, and shelter-in-place design guidance for new development across elements</p> <p>Policies and programs promoting retrofit strategies for residential subdivisions that have only 1 point of ingress/egress (Note: CAL FIRE conducting surveys pursuant to Public Resources Code 4290.5)</p>	
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<p>Environmental Justice, or other elements</p>	<p>Environmental Justice: Required topic in jurisdictions with disadvantaged communities, as defined in statute using one or more methods.</p> <p>Must address topic of EJ, either in a stand-alone element or as a cross-cutting topic across one or more elements.</p>	<p>SB 1000 (2016)</p> <p>Gov't Code 65302(h)</p>	<p>During the next update of two or more elements concurrently on or after 1/1/2018.</p>	<p>All elements of the general plan, along with other implementing plans or code, can incorporate goals, objectives, policies and programs that are equitable, promote environmental justice, and create healthy communities</p> <p>Housing, land-use, and safety elements: coordinated policies on increasing affordable, fair, safe and sanitary housing</p> <p>Land-use, circulation, housing, and EJ element policies to require equitable infrastructure investments in disadvantaged communities, supportive of neighborhood reinvestment and increasing housing production</p>	<p>Community or Neighborhood Plans</p> <p>Community Health Plans</p> <p>Climate Action or Adaptation Plans</p> <p>Resilience plans</p>
<p>Various elements</p>	<p>Greenhouse gas (GHG) emissions mitigation / climate action planning:</p>	<p>No specific statutory requirements</p>	<p>No statutory requirements exist.</p>	<p>Land-use, circulation and housing element policies that are coordinated and</p>	<p>Climate action plans</p>

	<p>Local agencies may include the topic of climate change and GHG emissions mitigation in their general plans.</p> <p>Addressing climate change broadly in local general plans to include both GHG emissions and climate adaptation (already required as noted above) can provide a holistic and integrated approach to addressing climate change.</p>	<p>exist for addressing GHG emissions mitigation in the general plan.</p> <p>CEQA requires analysis and mitigation of GHG emissions associated with proposed projects (includes general plan updates).</p>	<p>Timing of addressing GHG mitigation through the general plan is at discretion of local agencies.</p>	<p>focus growth in infill or transit-supportive areas such as transit-priority areas or encourage housing in transit-oriented developments.</p> <p>Circulation element policies or programs that are housing-supportive and require or encourage investments in active transportation projects that increase walking, biking, or taking transit</p> <p>Policies requiring or encouraging green, energy efficient, carbon-free or zero-net energy building codes can lead to production of housing with improved indoor air quality and reduced operating costs (see also climate adaptation above)</p>	<p>GHG Reduction Plans</p> <p>Sustainability Plans</p>
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