

December 18, 2015

Director Ken Alex  
Governor's Office of Planning and Research  
1400 Tenth Street  
Sacramento, CA 95814

**RE: Public Draft of the General Plan Guidelines (October, 2015)**

Dear Director Alex and Staff:

The Alliance of Regional Collaboratives for Climate Adaptation (ARCCA) welcomes the Governor's Office of Planning and Research (OPR) for the opportunity to review the Public Draft of the General Plan Guidelines.

*About the Alliance of Regional Collaboratives for Climate Adaptation*

ARCCA is a network of leading regional collaboratives from across California focused on building resilience to the impacts of climate change. ARCCA members are already coordinating and supporting climate adaptation efforts in their own regions to enhance public health, protect natural systems, build economies, and improve quality of life. Through ARCCA, member regional collaboratives have come together to amplify and solidify their individual efforts, as well as to give a strong voice to regionalism at the state and federal levels. ARCCA members share information on best practices and lessons learned; identify each region's most innovative and successful strategies; and determine how to adapt these strategies to another region's particular needs. As a result, ARCCA bolsters the efforts of member regional collaboratives and empowers those interested in forging new regional partnerships.

ARCCA represents regions that have developed governance structures that, where appropriate, include Metropolitan Planning Organizations (MPOs) and Councils of Governments (COGs), but are not necessarily bound by their service territories. The structures of ARCCA member regional collaboratives vary across the state to address issues unique to each region. By allowing each region to define its own boundaries, we are able to avoid issues that arise from top-down designation (e.g., exclusively using MPOs for program dissemination, thereby excluding rural areas from participating).

*Recommendations*

We greatly appreciate the addition of a new climate change section in the updated General Plan Guidelines (GPG), as well as OPR's recognition that climate mitigation and climate change impacts must be examined throughout the required elements of the General Plan. Like health and equity, climate change must be integrated throughout planning to prepare our communities for a prosperous, climate-ready future. The State has taken a critical leadership role on both climate change mitigation and adaptation through AB 32, Executive Order B-30-15, and countless agency actions. But it is cities and regions that will be taking a primary role in the land-use and planning decisions that will shape their energy consumption as well as their climate resilience; thus, providing clear, thorough, useful guidance within the GPG is essential.



- 1. Strengthen the regional approach:** Cities undertake General Plan updates within their own boundaries, but the GPG should recommend a more regional approach to support greater policy coordination as well as critical urban-rural and downstream-upstream connections. Unlike when General Plans were first introduced, people now increasingly live, work, and play across a region, while their food may come from a local farm in a neighboring county, and their water may flow from hundreds of miles away. Communities are bound together not just by city limits but also at the landscape level, by shared reliance on watersheds, forests, grasslands, and agricultural lands, as well as shared risks from coastlines and floodplains.

Rural areas steward important resources that the state relies upon. The well-being of all Californians is inextricably tied to the goods and services (e.g., clean water, clean air, carbon storage and recreation) that are provided by resource-rich, rural areas. A regional approach to planning can help regions decide together how to grow while simultaneously protecting watersheds, forests, wetlands, and agricultural lands.

To realize success, we would like to see the final draft empower local communities and regional entities in all parts of the state – north and south, coastal and inland, urban and rural – and across all sectors to plan and build in ways that strengthen the state’s overall economic, environmental, and social resilience in an efficient, effective, and equitable manner.

- 2. Emphasize the triple bottom-line benefits of planning for climate change:** We applaud the prominent inclusion of climate change as the first of four key themes for the GPG’s policy recommendations in Chapter 1. We recommend making the following change, however, to highlight that mitigating and adapting to climate change are important to the triple bottom line, benefiting the environment, community, and the local economy:

*p. 8 (p. 23):* “OPR’s GPG recommendations focus on how the general plan can achieve both GHG emission reductions and resiliency to climate change impacts and lead to healthier and more prosperous communities.”

California and the nation have shown that we can address climate change while growing the economy. Climate-smart planning can help cities and towns take advantage of the economic, environmental, and health benefits of clean energy while also increasing green jobs and green businesses. Preparing cities for sea-level rise, flooding, and other climate risks can help attract stable businesses and long-term investments.

- 3. Include key new developments in state climate policy:** Beginning from p.11 (p26 in the PDF), the section “California’s Climate Change Policy and Local Communities” mentions several key bills that set California’s direction on climate change. We would recommend also mentioning the following new bills:

- SB 350, which will double building energy efficiency and increases the Renewable Portfolio Standard to 50 percent;
- SB 246, which will coordinate regional and local efforts with state strategies to address climate impacts; and

- SB 379, which will require cities and counties to include climate adaptation and resiliency in the safety elements of their general plans or local hazard mitigation plans.

It may also be worthwhile to discuss the landmark Paris Climate Agreement reached on December 12, 2015, and the national goals and commitments that California and all states will be contributing to achieving. It is also important to note the key role of cities, counties, and regions in the state in supporting GHG reductions and climate resilience in their areas of authority and oversight.

4. **Greater consideration of climate impacts on flood risk:** The discussion of flooding and flood risks do not adequately consider climate change in both the Land Use and Safety elements. The document should recommend that cities and counties consider climate impacts upon flood severity and frequency, as well as exacerbating factors such as drought and wildfire.

Furthermore, flood risk reduction requires regional coordination. It is a multi-agency, multi-media effort and in this role regional collaboratives like the members of ARCCA can play a key role. Restoring meadows and other upper watershed conservation work can help store precipitation longer and release it more slowly, helping to restore flood risks. This approach can be far less costly than gray infrastructure, and is another important example of how downstream, urban users can support and benefit from upstream, rural projects.

5. **Better integrate sea-level rise guidance into the GPG:** While the document strongly supports the notion that policies put forth in the general plan should be consistent with other planning efforts and incorporate climate change considerations, from a coastal planning perspective, the guidelines do not adequately integrate the coastal hazards and the new State guidance related to coastal land use planning. Recommendation is to better connect general plan guidance with the California Coastal Commission's Sea Level Rise Policy Guidance and integrate planning for sea-level rise and coastal hazards (i.e. storms and erosion) into the GPG.

6. **Consider rural health impacts:** We appreciate the detailed consideration of climate change impacts on public health in Chapter 5, Healthy Communities. To strengthen the GPG, we recommend ensuring that rural health impacts are also taken into account. Rural communities may be more isolated and receive less information about heat, vector-borne disease, and other emerging climate-related health risks, while they also lack easy access to resources such as cooling centers. The Environmental Health section starting on p.229 should take into account rural hazards such as severe air pollution from the increased severity and frequency of wildfires and non-urban pollution from mercury in waterways.

7. **Highlight connection between climate change and social equity:** Climate change will have a disproportionate impact on vulnerable communities and increase social inequities around the state. We recommend that the discussion of climate change impacts be included in the introductory section to Chapter 6, Social Equity, Environmental Justice, & Community Resilience to emphasize its importance. Supporting clean energy and improving air quality have provided effective rallying points for environmental justice organizations around the state. Disadvantaged communities will also be more vulnerable to heat waves, flooding, increased costs of food, and other climate risks, while also having less access to resources that will enable

them to relocate and rebuild. Highlighting these themes in the introduction will help frame their importance.

In addition, the GPG also needs to be sure that equity is addressed in both urban and rural areas of the state, including in rural mountain areas. Urban-rural disparities should be taken into account as part of geographic inequity. The GPG should also address collaborating regionally to support the concept of regional resilience and regional interdependencies, e.g., between urban and rural areas for raw materials, energy, and water distribution, etc.

- 8. Enhance the connection between climate resiliency and business resiliency:** We recommend adding a section on how planning for climate resiliency is an important part of supporting a strong local economy and small businesses in the “Economic Development and the General Plan” section, p.257. Small businesses often lack the resources to undertake planning for extreme weather and other natural disasters, and can often be caught unprepared. After Hurricane Sandy, nearly 30 percent of small businesses closed permanently, while FEMA estimates that over 40 percent of businesses hit by disasters never open again. By incorporating climate impacts into long-term planning, cities can help their local economy and businesses recover more quickly from natural disasters and other disturbances. This can also help cities present themselves as a more resilient and stable choice for business and investment, thus fostering job growth and development.

At the same time, public-private partnerships on resiliency planning can help cities undertake much-needed infrastructure improvements while businesses gain stability and safety. Businesses have clear gains from streets that don’t flood, lights and refrigeration systems that stay on, and employees that can still come to work. Helping businesses see how they benefit from resiliency planning and improvements can help cities and counties gain funding and political support for climate adaptation planning and implementation, and potentially other sustainability and climate goals as well. We recommend using the term “business resiliency” to help bring businesses on board.

- 9.** We would like to thank OPR for including ARCCA in the GPG, and we look forward to advising more communities on regional adaptation collaboratives. We would like to recommend the following change to reflect our inclusion of the Sierra Nevada region and the importance of the urban-rural connection for climate resilience:

The Alliance of Regional Collaboratives for Climate Adaptation (ARRCA) (see [www.arccacalifornia.org](http://www.arccacalifornia.org)) was developed in 2012 to help prepare California’s urban centers, and the rural resource areas on which they depend, for both extreme and gradual climate change impacts, and serves as a coordination network for policy and program initiatives related to climate change impacts.

We would also like to recommend including ARCCA’s Principles of Adaptation as a linked resource: <http://www.arccacalifornia.org/download/annotated-arcca-principals-of-adaptation/>.

In addition, we recommend that urban cities and counties take into account the importance of their connection to California’s rural, resource-rich areas as part of their adaptation strategy.

For example, investment in upstream watersheds can help protect urban areas from flooding and support their long-term water security, and forest management can help prevent wildfires that deteriorate air and water quality. This approach can help cities achieve long-term climate benefits at lower costs. What happens upstream – such as the loss of snow pack or forests – is extremely important to a county or city’s future planning decisions. By taking into consideration their reliance on rural resources, urban areas can plan more effectively and holistically and be ready for the future.

We hope these comments are helpful and welcome the opportunity to provide additional clarification or support the development of specific language as desired. We’d like to thank OPR for the hard work that has resulted in this draft and the meaningful efforts to engage the public and seek their input, as well as your continued support for ARCCA.

Sincerely,



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