ARCCA Alliance of Regional Collaboratives for Climate Adaptation

November 4, 2016

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

RE: SB 379 Safety Element Comments

Dear Director Ken Alex and Staff:

The Alliance of Regional Collaboratives for Climate Adaptation (ARCCA) welcomes the opportunity to provide comments on the DRAFT Safety Element update of the General Plan Guidelines for SB379.

ARCCA is a network of existing regional collaboratives from across California. Our members represent leading regional collaboratives that are 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 come together to amplify and solidify their individual efforts, as well as to give a stronger 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 these strategies could be adapted to another region's particular needs. As a result, ARCCA bolsters the efforts of member collaboratives and empowers those interested in forging new regional partnerships. ARCCA's membership covers nearly 80 percent of the state and includes leading collaboratives from the San Francisco Bay Area, Los Angeles region, San Diego region, Capital (Sacramento) region, and the Sierra Nevada.

We appreciate the time and effort that went into updating the Safety Element chapter of the General Plan Guidelines to incorporate climate change adaptation and resilience, and offer a few suggestions for improvement that we hope you will find valuable.

1. Consistent with state policy, local jurisdictions need to consider the needs of disadvantaged communities and vulnerable populations, using the broadest definitions possible. This is especially true, before, during, and after natural disasters, because many of those populations are also more vulnerable to shocks (e.g. they may lack transportation means and/or are socially and/or linguistically isolated). Therefore, we recommend integrating climate justice and equity considerations more comprehensively throughout the Safety Element to underscore the importance of engaging and supporting disadvantaged communities and vulnerable populations that are disproportionately affected by climate change and extreme weather events. More specifically, we recommend that in order to identify the full scope of vulnerabilities and to define feasible solutions, the Safety Element should address how local

jurisdictions can engage with low-income communities, communities of color, and other vulnerable populations such as the disabled and elderly to more accurately assess vulnerabilities and identify priority strategies that will ideally lead to more effective and equitable hazard mitigation. Related to this, we recommend that the Safety Element encourage jurisdictions to evaluate whether their high-vulnerability communities also overlap geographically with high-risk areas and develop targeted emergency plans for these communities, which should include public outreach, education, and engagement strategies. Jurisdictions should, for example, identify public housing units and their level of vulnerability and risk. Post-disaster response should also be addressed: For example, low-income and vulnerable populations are more likely to be displaced or face difficulty returning to their homes or financing repairs.

2. We encourage OPR to provide more comprehensive guidance to help local jurisdictions move forward on this critical activity expeditiously and better assess and prioritize immediate hazards, hazards exacerbated by climate change, and unique climate change impacts. Specifically, we suggest the following

    a. Although under SB 379 local jurisdictions that have not adopted a local hazard mitigation plan are required to address climate adaptation and resiliency strategies in the Safety Plan of their General Plans by January 1, 2022, we recommend OPR incorporate language that encourages jurisdictions to expedite this timeline. We are already experiencing the effects of climate change, and local jurisdictions and the communities they serve would benefit from the prompt integration of adaptation and resiliency considerations into their plans and decision-making process.

    b. It is important that this guidance provide clearer actionable definitions to terms like “reasonable”, “unreasonable”, and “feasible.” We are unclear if the referenced APG or Cal-Adapt tools provide those definitions or set criteria for assessing them in a specific way, but this guidance should at least address the vagueness and ambiguity of these highly subjective terms to help jurisdictions plan the level of effort, quality of data analysis, and rigor of their measures more effectively.

    c. We encourage OPR to provide additional guidance to help local jurisdictions obtain a clearer sense of the timeframe that should be used in planning for climate change risks. For example, the long-term nature of safety investments and the increasing intensity of climate impacts may mean that jurisdictions should look farther out than the 20-year outlook of many General Plans that cities are developing today.

    d. The description of risk and hazards related to climate change seems underdeveloped and we feel that the guidance would benefit from:

i. Stronger statements regarding the certainty of climate change impacts to more effectively encourage local jurisdictions to act. We encourage OPR to discuss climate change with greater certainty by avoiding terms and phrases like "may" and "will likely."

ii. Providing greater specificity of the range of the ongoing and anticipated climate change effects and impacts to demonstrate the full spectrum of risks that local jurisdictions need to consider, which should include localized flooding from creeks and streams, coastal flooding, increased wildfire, and public health and safety impacts related to air quality, water quality, flood- or drought-caused diseases, extreme heat, and food, power, water system disruptions.

iii. Creating a stronger link between natural hazards and climate change to demonstrate how climate change will exacerbate or intensify the impact of existing and already-anticipated hazards, particularly in the Required Contents section.

iv. Specifically identifying sea level rise and its impact on coastal/bay/delta hazards (i.e. storms and erosion) as a component to be addressed in the flooding section. Include guidance on relevant sources of information at federal, state and local level such as the NOAA Sea Level Rise Viewer, U.S. Geological Survey's Coastal Storm Modeling System (which was largely funded by the State), or other SLR-related data available on CalAdapt. Better connect general plan guidance with the CA Coastal Commission's Sea Level Rise Policy Guidance and Local Coastal Programs.

3. Lastly, we recommend a few changes to help make the guidance easier to navigate and more valuable for local jurisdictions:

   a. Build out the checklist to include high-level steps and considerations from the Adaptation Planning Guide to provide a more holistic sense of the risks and hazards that jurisdictions need to consider and the objectives, processes, and resources to guide and support their efforts.

   b. Categorize the *OPR Recommended Policies* chart, provide additional sample policies for each major requirement, and include examples from a wide range of community types including by size, landscape (coastal, valley, mountain, desert), and urban vs. rural.

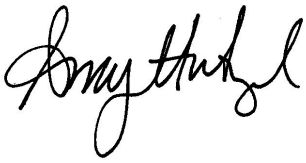
   c. Include concrete examples of key considerations and strategies (e.g., ensuring multiple ingress/egress routes for fire or natural disaster purposes, and elevating essential facilities above the flood risk zone by placing emergency rooms on the second or third floors above parking structures).

d. Provide a reference page where all linked resources are categorized and include brief descriptions about their recommended use, which also includes a list of key State agencies that can be consulted. We encourage OPR to list ARCCA as a technical assistance provider to help connect local jurisdictions with regional adaptation experts, practitioners, and resources.

Thank you for your consideration of our comments. We appreciate the thought that went into producing this draft update to the Safety Element of the General Plan Guidelines and look forward to reviewing the final version. If you are interested in discussing these comments in greater depth, please reach out to Julia Kim at jkim@lgc.org who can help coordinate a call with ARCCA members.

Sincerely,

Larry Greene
ARCCA Chair
Capital Region Climate Readiness Collaborative



Amy Hutzel
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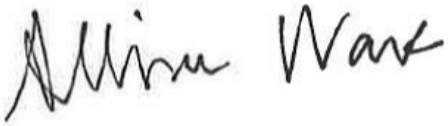

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