



## **PLANNING COMMISSION AGENDA REPORT**

**Meeting Date:** May 15, 2025

**Subject:** General Plan Amendment for New Safety Element and Revised Natural Environment & Hazards Element

**Prepared by:** Sean Gallegos, Senior Planner

**Initiated by:** City of Los Altos

**Attachments:**

1. Draft Resolution
2. Draft Safety Element
3. Draft Revised Natural Environment & Hazards Element

**Recommendation**

Recommend the City Council adopt a Resolution approving a General Plan Amendment for a new Safety Element and revised Natural Environment & Hazards Element; and find the project is exempt from environmental review pursuant to Sections 15060(c)(2) and 15061(b)(3) of the California Environmental Quality Act (CEQA) Guidelines, per the recommended findings in the attached Resolution - Attachment 1 to the report.

**Background**

The City's Natural Environment and Hazards Element, originally adopted as part of the 2002 General Plan, historically functioned as a combined element covering safety, noise, and air quality. At that time, Los Altos did not maintain a standalone Safety Element. Instead, the required safety topics such as seismic hazards, flooding, wildfire risk, and emergency preparedness were included within the broader Natural Environment and Hazards Element, along with policies addressing noise and air quality.

As part of this General Plan Amendment, the City proposes two (2) necessary actions:

1. Adoption of a new, standalone Safety Element to replace the safety-related content previously located in the Natural Environment & Hazards Element.
2. Adoption of a revised Natural Environment & Hazards Element, which will retain only the existing noise and air quality sections. The text, policies, implementation actions, and overall

format of the remaining Natural Environment & Hazards Element are unchanged, except for the removal of safety-related content now covered in the new Safety Element.

These actions ensure that all required General Plan topics are addressed in full compliance with State law, while also improving clarity and usability by providing a dedicated element for public safety. The Safety Element reflects current State mandates under Government Code §65302(g), including the integration of climate adaptation strategies (SB 379), evacuation route planning (AB 747 and SB 99), and hazard mitigation coordination (AB 2140). It incorporates findings from the Santa Clara County Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) and aligns with the City's Climate Action and Adaptation Plan (CAAP) to support a coordinated, forward-looking framework for hazard resilience and emergency preparedness.

### State Law Requirements

State Government Code §65302(g) requires every city and county in California adopt a Safety Element as part of its General Plan. The Safety Element includes goals, policies, and actions aimed at protecting the community from unreasonable risks associated with natural and human-made hazards, including (but not limited to) earthquakes, landslides, flooding, wildfires, and climate change. Over the past decade, new laws have expanded these requirements to address emerging threats and improve resiliency.

The last update to the Los Altos Safety Element occurred in 2002, and since that time, significant legislative mandates have occurred, including:

- SB 379 (2015): Requires cities to address climate adaptation and resiliency in the Safety Element by including a climate change vulnerability assessment and related policies (or by incorporating a Local Hazard Mitigation Plan that addresses climate risks).
- SB 1035 (2018): Requires safety elements to be reviewed and updated with each Housing Element revision to ensure new information on fire, flood, and climate hazards is integrated.
- AB 747 (2019): Requires an analysis of evacuation routes in the Safety Element, evaluating their capacity, safety, and viability under a range of emergency scenarios.
- SB 99 (2019): Requires identification of any residential developments in hazard areas that have only one emergency evacuation route (for wildfire or flood) and policies to address evacuation constraints.
- AB 2140 (2006): Allows and encourages the City to adopt its Local Hazard Mitigation Plan (LHMP) into the Safety Element by reference, which can improve eligibility for post-disaster funding. Per Government Code §65302(g)(4), integrating the LHMP satisfies many hazard identification and climate adaptation requirements.

## Housing Element Coordination

The City's Housing Element was adopted in January 2023. Per State law (SB 1035) and guidance from the Governor's Office of Land Use and Climate Innovation (LCI), the Safety Element should be updated concurrently or shortly after the Housing Element to reflect current data and policies on safety as they relate to housing within the community. This amendment ensures compliance with State law as it relates to the timing of the required update in relation to the recently adopted Housing Element. The new Safety Element will be integrated into the future comprehensive General Plan update along with the Housing Element.

## Process

The City initiated the Safety Element in 2024 to comply with the above mandates and to enhance safety planning. Key steps completed to date:

- Engaged a planning consultant and convened an inter-departmental team (including Development Services Department, Public Works Department, Los Altos Police Department, and the Santa Clara County Fire Department) to develop the draft element.
- Provided community engagement through citywide public workshops, surveys, dedicated website, and public review process for the draft documents. The City of Los Altos prioritized inclusive engagement to ensure the updated policies and actions reflected the needs and concerns of residents, stakeholders, and partner agencies.
- Reviewed existing conditions and hazards using the best available science and mapping (e.g. seismic zones, FEMA flood maps, wildfire risk areas, climate projections).
- Incorporated findings from recent plans: the Climate Action & Adaptation Plan (2022) and the Emergency Operations Plan (2021), which provide relevant strategies for climate resilience and emergency response.
- Coordinated with Santa Clara County and participated in the regional update to the Santa Clara County Multi-Jurisdictional Hazard Mitigation Plan (MJHMP). On August 27, 2024, the City Council adopted Resolution No. 2024-68, formally accepting Volume I and the City of Los Altos Annex within Volume II of the 2023 MJHMP. The MJHMP's data, vulnerability assessments, and strategies have been incorporated by reference into the Safety Element in accordance with the requirements of Assembly Bill 2140 (AB 2140).

## **Analysis**

The proposed General Plan Amendment updates the City's General Plan in accordance with State law. It creates a new standalone Safety Element with updated policies addressing hazard mitigation, climate adaptation, and emergency preparedness. It also revises the Natural Environment and Hazards Element to reflect the relocation of safety-related content. Together, these actions improve organizational clarity, ensure compliance with State law, and support the City's long-term resilience and environmental planning efforts.

Overall, the proposed Amendment ensures internal consistency within the General Plan, reinforces established City policy priorities, and provides a clear, comprehensive basis for guiding future decision-making related to hazard mitigation, resilience, and community safety.

### Safety Element

The Safety Element is a component of a City's General Plan that identifies and addresses potential risks and hazards that could affect the community. Its purpose is to incorporate safety considerations into planning and decision-making to protect residents, businesses, and visitors from natural and human-caused hazards. It provides policy direction but does not directly initiate, fund, or implement development projects or environmental changes. Instead, it outlines strategies to reduce risks from natural and human-caused hazards and guides updates to key City plans, regulations, and processes.

The Draft Safety Element (Attachment 2) has been organized to meet applicable State law requirements and to provide a clear, actionable framework for enhancing public safety and hazard mitigation in Los Altos. The document is structured into three (3) primary sections: (1) an Introduction, which outlines the purpose of the Safety Element, applicable legal mandates, and its relationship to other City planning efforts; (2) a Hazard Identification and Risk Assessment, which evaluates natural and human-caused hazards that could affect the community, including seismic risks, flooding, wildfire, climate change, and hazardous materials; and (3) Goals, Policies, and Implementation Programs, which establish the City's strategic approach to risk reduction, climate adaptation, evacuation planning, and regional hazard mitigation coordination.

The Safety Element is structured around seven (7) core goals, each corresponding to a hazard identified in the Hazard Assessment and aligned with applicable State and regional requirements. Each goal is supported by policies and implementation actions that provide a clear framework for enhancing public safety and community resilience. Policies are labeled numerically (e.g., SE-4.1), and implementation actions alphabetically (e.g., SE-1.a, SE-1.b), allowing City staff, decision-makers, and regional partners to easily reference and apply them.

The Draft Safety Element (Attachment 2) fulfills all requirements under California Government Code Section 65302(g), along with recent mandates designed to strengthen local preparedness and climate resilience. It includes a comprehensive climate vulnerability assessment in compliance with SB 379, evaluates evacuation routes and single-access areas per AB 747 and SB 99, and formalizes integration of the MJHMP in accordance with AB 2140. Additionally, it includes a commitment to regular review and revision per SB 1035 to ensure consistency with other planning efforts.

The following is a summary of the key components and how they address state mandates and local needs:

- Hazard Identification & Risk Assessment: The Safety Element provides a comprehensive evaluation of natural and human-caused hazards affecting Los Altos, as required by Government Code §65302(g). It addresses risks including earthquakes, liquefaction, landslides, wildfire, flooding, hazardous materials, and climate-related impacts such as

extreme heat, drought, and sea-level rise. The assessment incorporates current data sources and integrates the 2023–2028 MJHMP, formally adopted by the City on August 27, 2024. In accordance with AB 2140, the MJHMP’s vulnerability assessment and mitigation strategies are adopted by reference, ensuring regional consistency and eligibility for future hazard mitigation funding

- Evacuation Routes and Emergency Response: In compliance with SB 99 and AB 747, the Safety Element evaluates the City's evacuation network, focusing on areas with constrained access or single ingress/egress. It identifies neighborhoods with limited evacuation options and emphasizes coordination with neighboring jurisdictions and Santa Clara County to improve route capacity and safety. Policies and actions support enhanced evacuation planning through interagency collaboration, public outreach, and integration of evacuation considerations into development review, as well as maintenance of the Emergency Operations Plan (EOP), mutual aid agreements, and emergency communication systems like AlertSCC and Genasys Protect.
- Climate Adaptation and Resilience: The Safety Element incorporates climate change adaptation throughout, as required by SB 379, supported by a Climate Change Vulnerability Assessment identifying local impacts such as extreme heat, drought, and wildfire. It aligns with the City’s CAAP and includes strategies such as heat emergency response protocols, identification of cooling centers, and regional coordination to enhance infrastructure resilience, particularly in areas vulnerable to sea-level rise.
- Wildfire Risk and Evacuation Planning: Although Los Altos is not subject to SB 1241 due to its location outside Cal Fire–designated Very High Fire Hazard Severity Zones, the Safety Element addresses wildfire risk consistent with the intent of the law. It includes policies for fire-safe development, defensible space, fire-resistant construction, vegetation management, and emergency access, as well as coordination with the Santa Clara County Fire Department and mapping for areas with limited evacuation access. Additionally, should changes to be made in State law in the coming year due to the recent Wildfires in Los Angeles, those will be integrated during the Comprehensive General Plan Update which will begin in Fall 2025.

### Natural Environment & Hazards Element

The proposed revisions to the Natural Environment and Hazards Element (Attachment 3) remove the safety-related content while retaining the existing noise and air quality sections with no substantive changes and remains consistent with the overall General Plan. The revisions preserve the City’s environmental quality goals and ensure internal consistency across all elements of the General Plan.

The Natural Environment and Hazards Element continue to address key environmental quality topics, specifically noise and air quality. The noise section fulfills the City’s statutory obligation under Government Code Section 65302(f) by identifying major community noise sources, such as traffic from major roadways, and establishing policies to promote noise-compatible land uses and effective mitigation. The Air Quality section, while not required by State law, is retained to support regional air quality goals and local strategies for reducing pollution exposure. Policies in both

sections remain unchanged from the previous version but will be evaluated during the upcoming Comprehensive General Plan Update.

The revised Natural Environment and Hazards Element remains consistent with the broader General Plan. The noise section supports land use compatibility and community health, consistent with Land Use Element Goal 2 (Promote a High Quality of Life) and Housing Element Policy H-2.6 (Ensure Housing Quality and Neighborhood Compatibility). The air quality section advances environmental protection goals outlined in the Open Space, Conservation & Community Facilities Element Goal 4 (Preserve and Protect Natural Resources) and complements the Climate Action and Adaptation Plan (CAAP) by promoting strategies to reduce vehicle emissions and encourage sustainable transportation alternatives.

Overall, the Natural Environment and Hazards Element retains its original structure and focus, ensuring Los Altos remains aligned with State planning requirements and its long-term vision for sustainability, health, and resilience.

### Community Engagement

Community participation played a vital role in the development of the Safety Element. The City prioritized inclusive engagement to ensure the updated policies and actions reflected the needs and concerns of residents, stakeholders, and partner agencies, consistent with California Government Code Section 65302(g). Key outreach activities included:

- Community Workshops: The City hosted two (2) community meetings during the drafting stage:
  - *August 7, 2024*: Introduced the Safety Element process, reviewed the City's hazard profile, and gathered input on residents' concerns, such as earthquake preparedness, wildfire evacuation, and flood-prone intersections.
  - *November 13, 2024*: Presented the draft goals, policies, and actions. Public feedback supported stronger emergency communications and fire fuel management, many of which were incorporated into the revised draft.
- Online Community Survey: An online survey (Summer 2024) collected over 82 responses, identifying priorities like improved disaster notifications, emergency training, and climate resilience measures. Survey input informed new action items, such as expanded neighborhood CERT (Community Emergency Response Team) programs.
- Agency Consultation: The City coordinated with internal departments, including Development Services Department, Public Works Department, Police Department, and the Santa Clara County Fire Department, to ensure the Safety Element addresses wildfire risk, evacuation, and emergency response. Their input helped align the Safety Element with local and regional safety goals. As Los Altos is not located in a State Responsibility Area or a Cal Fire Very High Fire Hazard Severity Zone, consultation with Cal OES was not required under Government Code Section 65302(g).

- Public Review Draft: The Draft Safety Element was released for a formal 10-day public review period from April 10 to April 20, 2025. The document was posted on the City website and noticed via e-mail to interested parties. During this period, stakeholders were invited to comment. No public comments have been received to date.
- Public Notification: Public notification for all community engagement activities, including the community workshops, online survey, release of the Public Review Draft, and Planning Commission hearing — were published in the *Palo Alto Daily Post* and posted on the City's Safety Element webpage.

## **Environmental Review**

Adoption of the General Plan Amendment for a new Safety Element and revised Natural Environment & Hazards Element is exempt from environmental review under the California Environmental Quality Act (CEQA). This action qualifies for the commonsense exemption pursuant to CEQA Guidelines Sections 15060(c)(2) and 15061(b)(3), which applies when it can be seen with certainty that there is no possibility the activity may have a significant effect on the environment. These General Plan policy updates do not authorize new development or physical improvements, but instead provide guidance for future hazard mitigation and planning efforts. They strengthen existing policy direction and ensure compliance with State law, without relaxing any environmental protection standards or enabling new impacts. As such, no further CEQA review is required. This determination is consistent with CEQA provisions governing the adoption of policy documents that do not result in direct or reasonably foreseeable indirect environmental effects.

## **Next Steps**

The Planning Commission's consideration and recommendation on the General Plan Amendment will be forwarded to Council for consideration and decision at a future meeting which will be noticed separately.