



April 4, 2024

The Honorable Isaac Bryan
California State Assembly
1021 O Street, Room 5630
Sacramento, California 95814

RE: AB 2684 (Bryan) Safety element: extreme heat – NEUTRAL AS PROPOSED TO BE AMENDED

Dear Assemblymember Bryan:

The American Planning Association, California Chapter (APA California) **intends to move to a neutral position on your bill, AB 2684, as proposed to be amended.** When amended AB 2684 will, upon the next revision of one or more elements included in the general plan on or after January 1, 2028, require a local jurisdiction to review and update the safety element as necessary to address the hazard of extreme heat.

APA California is a non-profit organization made up of practicing planners, citizens and public officials committed to advancing the practice of local, regional, and statewide planning throughout urban, suburban, and rural California. As adopted in APA California's Legislative Platform, *Plan California*, our organization is supportive of additional resources and funding for local evaluation and mitigation of hazards and risks associated with climate change, including extreme heat. Planning for and mitigating extreme heat impacts are becoming a critical issue that communities must grapple with, which we know will only continue as more severe and frequent weather-related events continue to impact California. Unfortunately, there's currently limited statewide funding sources to help support local efforts to address this issue, including the planning work that would need to be done based on the bill in print.

Additionally, several new mandates to update various elements of the general plan over the last several years, including new proposed mandated updates this year, do not consider the level of detail, funding, and staff capacity that are needed to properly comply with all of these new mandates at the local level. Planners are attempting to keep pace with the level and scale of new planning-related laws that are passed year over year, however many jurisdictions simply lack resources, both in terms of funding and staff capacity, to keep up with the cumulative burden imposed by these new mandates. To reach the goals of the bill and ensure that planners have the time to implement, we suggested amendments to the bill that will add extreme heat to the list of hazards that must already be addressed in the safety element. As introduced, the trigger provision of tying a new general plan update mandate to the next Local Hazard Mitigation Plan update could cause confusion and create challenges with implementation because of inconsistencies with other trigger provisions in recent or other currently-proposed bills. Additionally, consistent with our request on all legislative proposals this year to update the general plan, our organization believes a clear, predictable, and coordinated window for general plan element updates will result in more efficient and coordinated planning efforts, which is why we suggested requiring the new planning mandates in your bill take effect upon the next revision of one or more elements included in the general plan on or after January 1, 2028.

We greatly appreciate the time your staff and sponsors have spent with APA California to discuss concerns and to allow our organization to put forward amendments to the bill. We are especially grateful for the early outreach and opportunity to provide feedback on a proposal that would directly impact planners at the local level. As always, our organization appreciates and welcomes opportunities on how best to



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implement related laws so that successful outcomes are more likely. **Based on the forthcoming amendments noted above, APA California will move to a neutral as amended position.**

If you have any questions, please contact Lauren De Valencia, Stefan/George Associates, APA California's lobbyist, at 916 443-5301, lauren@stefangeorge.com.

Sincerely,

A handwritten signature in blue ink, appearing to be 'ED'.

Erik de Kok, AICP
Vice President Policy and Legislation
APA California

cc: Assembly Local Government Committee
 Assembly Republican Caucus
 The Governor
 The Office of Planning and Research