
CHAPTER 5

Format and Element Integration

All statutory references are to the California Government Code unless otherwise noted.

While state law specifies the basic content of the general plan, §65301(a) provides that the general plan may be adopted in any format the city or county chooses. A key consideration in deciding on a format is that the plan should be clear, concise, and easy to use.

The various issues identified in the seven mandatory elements overlap to a great extent. For example, simply following the statute would mean that flooding would have to be discussed separately in the land use, open-space, conservation, and safety elements. A good general plan avoids this sort of repetitiveness. Combining related elements, such as land use and circulation or open-space, conservation, and safety, is one effective way to do this. Organizing the general plan by issue area, such as community development, environmental resources management, and hazards, rather than by the individual mandatory elements, is another effective approach.

EQUAL STATUS AND INTERNAL CONSISTENCY

Every general plan must contain the seven mandatory elements: land use, housing, circulation, noise, conservation, open space, and safety (§65302). The plan and its elements must comprise “an integrated, internally consistent and compatible statement of policies...” (§65300.5). In other words, the land use element must be correlated with the circulation element, and so on. All elements of the general plan have equal legal status. No one element takes precedence over any other.

Statute requires that a general plan be integrated and internally consistent, both among the elements and within each element. For example, the data, assumptions, and growth projections in the various parts of the plan must be consistent with one another. This is called horizontal consistency.

Each jurisdiction is allowed to determine the appropriate format for its general plan and statute specifically allows elements to be combined (§65301). However, it is most common for jurisdictions to adopt elements individually, resulting in separate

documents for each element. This practice creates problems, particularly if the elements are prepared and adopted over many years without proper correlation among elements.

The overarching requirement that general plans be internally consistent is easy to forget during the intensive public process of creating the individual elements. Part of the problem lies in the manner in which the format and elements of the general plan are described in planning statute. The general plan statutes describe the seven mandatory elements individually, giving the impression that each element is a stand-alone document. Most general plan amendments and revisions occur in an incremental fashion, one element at a time. While elements may be combined, general plan statutes give no clear direction on how or why.

Careful formatting and presentation style make the document easier to understand and make it easier to identify key policy issues that cross the boundaries of individual elements. Element consolidation is another means to achieve internal consistency within the general plan. Performing periodic comprehensive reviews and updates of the general plan can help to identify internal inconsistencies so that they may be corrected.

ELEMENT CONSOLIDATION

Merging or consolidating elements allows a city or county to combine the discussion of related issues into functional chapters and to eliminate redundancies within the general plan. This is easiest to do when a city or county is preparing to write a new general plan or to perform a comprehensive update of an existing plan. However, this approach can also be effective when revising two or more related elements of an existing general plan. Mentioned below are some of the ways that cities and counties have consolidated elements of their general plans to provide better integration of issues and policies.

Local Flexibility

Although planning law separates planning issues into seven elements (land use, housing, circulation, noise, conservation, open space, and safety), there is

no requirement that a general plan contain seven discrete sections having these titles. In fact, whereas a decade ago many general plans were comprised of several stand-alone elements under separate covers, nearly all new plans are written as a single document. Each of the issues is then addressed in a separate chapter or section of the document.

Numerous communities organize their general plans along functional lines, combining two or more issues into discrete chapters or sections with titles different from the seven elements enumerated in planning law. Most jurisdictions have at least one optional element, such as economic development, public facilities, environmental resources management, or community design. Each chapter of the general plan describes a set of related issues from the list of seven mandatory elements and the local jurisdiction's own optional elements. These consolidated elements may be entitled natural resources, community facilities, health and safety, environmental hazards, or community design, to name a few.

Advantages of Consolidation

The advantages of combining elements are many: internal consistency is easier to achieve; functionally related goals, objectives, and policies can be grouped together for easier reference; redundancy is minimized; and the general plan text can be held to a reasonable length, making the plan both easier to understand and easier to implement.

Streamlining to minimize duplication and overlap is a primary goal and benefit of element consolidation. For example, state planning law identifies flooding as an issue of concern in the land use, open-space, conservation, and safety elements. A consolidated plan might have an environmental hazards element containing a single set of goals and policies addressing issues such as flood hazards, floodplain management, flood control, and appropriate land uses for areas subject to flooding, in addition to treatment of seismic and fire hazards.

All too often, when separate general plan elements are revised or adopted, inconsistencies seep in among the goals, policies, objectives, and programs of the various elements. This is a real danger when the same or related issues are addressed independently in more than one discrete element. Consolidation reduces the possibility of inconsistencies by reducing duplication.

Because of the overlap among the planning issues required to be addressed in the general plan, there are certain elements that are particularly suited to con-

solidation. For example, the safety and noise elements share the goal of avoiding environmental hazards. The open-space and conservation elements have many resource-related issues in common. The land use, circulation, and housing elements all deal with the location and distribution of built facilities.

Consolidation Models

Around the state, the most recent trend is to consolidate elements into chapters that deal with cross-cutting issues, such as environmental resources management, community design, or community facilities. The following models and examples illustrate some of the ways in which consolidated plans may be organized. There is no "best" method; each community should select the format that best meets its particular needs. In practice, general plans often incorporate more than one of these methods of organization.

When selecting a format for the general plan, keep the following goals in mind:

- ◆ The plan and its parts must address the statutorily required issues to the extent that they are locally relevant.
- ◆ The general plan must be internally consistent.
- ◆ Goals, objectives, and policies must be understandable and practical to implement.
- ◆ The general plan document(s) should be as easy to use as possible.

One model for organizing the general plan is to consolidate along functional lines. For example, the planning issues identified in the seven mandatory elements can be reorganized into four elements:

- ◆ Housing and economic development (to address jobs, housing, and development in general)
- ◆ Resources (to address natural resources, including open space and resource conservation)
- ◆ Health and safety (to address noise, safety, and hazards of all types)
- ◆ Public and quasi-public facilities and services (to address support services for development, including transportation and other circulation issues)

A model well-suited to areas with a high concentration of natural resources or where there are numerous development constraints posed by natural resources is the resource-based general plan. Some communities with these characteristics have adopted an environmen-

tal resources management element that combines the open-space, conservation, and safety elements and the resource issues from the land use element (such as identification of flood-prone areas and timberland productivity zones). A general plan with a resource emphasis might satisfy statutory requirements by including the following four elements or chapters:

- ◆ Environmental resources management
- ◆ Land use and circulation
- ◆ Housing
- ◆ Noise

A variation of this theme is to organize the mandatory general plan issues around development constraints and opportunities as follows:

- ◆ Constraints element (issues: land use, open space, conservation, and safety)
- ◆ Opportunities element (issues: land use)
- ◆ Commercial and industrial element (issues: land use)
- ◆ Noise element
- ◆ Circulation element
- ◆ Housing element

A third model, which is often used in urban settings, involves a community development element that combines the issues that are central to land development. A model with a land use emphasis might combine mandatory issues as follows:

- ◆ Community development element (issues: land use, circulation, housing, and open space as it relates to resource production)
- ◆ Open-space and conservation element (issues: open space for the preservation of natural resources, outdoor recreation, and public health and safety)
- ◆ Noise element
- ◆ Safety element

Alternatively, the noise and safety elements in the example above can be consolidated further into a hazard management element.

A variation on the community development element used by some jurisdictions is the community form element. This element typically combines the land use and circulation elements, an optional design or historic preservation element, and possibly the housing element.

STYLE AND PRESENTATION

The following are some suggestions on style and presentation of information to make the general plan easy to understand and follow.

Clearly Identifying Policies

As statements of development policy, general plans should be functional and easily interpreted. Readers should be able to quickly reference objectives, policies, and programs without having to wade through technical data, explanations of methodology, or other miscellaneous information. Policies should flow coherently from objectives and implementation should be clearly described.

Ideally, any user of the plan, whether a staff member, decision-maker, member of the public, developer, or other person, should reach the same understanding when reviewing a given objective, policy, or plan proposal.

The general plan should clearly distinguish its objectives, policies, and plan proposals from background information and discussion. Although data and analysis are important to the preparation of the plan and help put the objectives and policies in context, including them in the main body of the general plan can obscure the primary purpose of the plan: to provide “a statement of development policies.” A preferable approach is to include the data and analysis in a technical appendix or in a separate volume (often called a background report). This way, the policies are easily discernible but the background information is readily available as needed.

Keeping the Audience in Mind

A general plan will be used by decision-makers and the public as well as by professional planners, so it should be written with these audiences in mind. To the extent possible, the text should be free of jargon, acronyms, and overly technical language. A concise glossary can help in this regard.

The general plan should be available for anyone to study or review. Accordingly, the format should neither hinder nor make prohibitively expensive duplication. Designing the format so that it eventually may be placed online is worth considering.

When drafting the plan, the staff or consultants should encourage the advisory committee, planning commission, and/or city council or board of supervisors to avoid writing in a bureaucratic style. Objectives and policies should be written in the active voice. Avoid policies that either provide little in the way of guidance for decision-making (i.e., “pursue an orga-

nized system of open-spaces”) or pass the buck (i.e., “encourage the preparation of a citywide parking study”). Try to stick to objectives and policies that are both feasible and concrete, as illustrated in the following examples: “Acquire open space along the north side of Alphabet Creek between Lincoln Park and Monroe Avenue for a Class I bike path” or “Parking in the Central Business District shall comply with the provisions of the 2001 Central Business District parking study.”

Using Diagrams and Graphics

General plan diagrams should be clear and concise. They should be of a convenient size for easy reference and duplication. Whenever possible, the diagrams should share a common base map. Designations and symbols should be consistent between diagrams.

Text boxes enclosing short discussions or explanations of particular points can provide information without detracting from the flow of the text. Illustrations, whether photos of preferred commercial development types or renderings of multipurpose trail profiles, for example, enliven the text.

Combining with the EIR

Local agencies may choose to combine the general plan and its environmental impact report into a single document (CEQA Guidelines Section §15166). However, OPR does not generally recommend this approach because it loads a great deal of information into a single document and may make revisions difficult. Refer to Chapter 7 for a discussion of CEQA compliance.