ATTACHMENT D

City of Placerville

General Plan Amendment GPA 26-06

Compliance Analysis – Government Code Section 65302.15

Conclusion: The City of Placerville's Safety and Noise Element complies with California Government Code Section 65302.15 when read together with the Greater Placerville Wildfire Evacuation Preparedness Study (WEPS, June 2024), the City's MJHMP Annex A (July 2024, adopted by City Council November 12, 2024), and the full County Multi-Jurisdictional Local Hazard Mitigation Plan (MJHMP, July 2024).

1. Statutory Requirements

Government Code § 65302.15(a) (enacted by Assembly Bill 747 and amended by Assembly Bill 1409) requires that the safety element of the general plan be reviewed and updated (upon the next local hazard mitigation plan revision or by January 1, 2022) to:

- Identify evacuation routes and their capacity, safety, and viability under a range of emergency scenarios;
- Identify evacuation locations; and
- The element may draw from an adopted local hazard mitigation plan, emergency operations plan, or other commensurate document (such as WEPS), but must summarize and incorporate that information.

Subdivision (b) requires ongoing updates with each housing element or hazard mitigation plan revision (no less than every eight years) to add new fire-hazard information.

2. How the Safety and Noise Element Satisfies § 65302.15

2.1 Explicit Acknowledgment of the Statute

In the dedicated "Evacuation Routes and Emergency Response" section (Section 3.3), the Element quotes the exact language of § 65302.15 and states that it "requires the General Plan Safety Element to identify evacuation routes and 'their capacity, safety, and viability under a range of emergency scenarios.'"

2.2 Incorporation by Reference of the WEPS Study and Related Plans

Chapter 2 ("Related Plans Incorporated by Reference") expressly incorporates into the Safety and Noise Element:

- The Greater Placerville Wildfire Evacuation Preparedness, Community Safety and Resiliency Study (WEPS, June 2024);
- The El Dorado County Multi-Jurisdictional Local Hazard Mitigation Plan (MJHMP) and City of Placerville Annex A (adopted November 12, 2024); and
- The Community Wildfire Protection Plan for Western El Dorado County (CWPP) and the Placerville Community Wildfire Resilience Strategy (CWRS).

The Element summarizes WEPS as identifying major evacuation routes within the project area and assessing road-network performance under specific evacuation scenarios based on criteria including evacuation time estimates (ETE) and potential bottlenecks derived from model simulations. WEPS evaluates four wildfire scenarios (the "range of emergency scenarios" required by the statute) and

models full versus reduced roadway capacity, departure-time distributions, bottlenecks, and mitigation recommendations. This is precisely the type of "commensurate document" permitted by § 65302.15.

2.3 Identification of Routes, Capacity, Safety, and Viability

- Primary evacuation routes are identified: U.S. Highway 50 (four-lane, primary east–west route) and State Route 49 (two-lane, north–south), together with supporting local roadways (illustrated in Exhibit 3.3-1).
- Capacity, safety, and viability analysis is provided through incorporation and summary of WEPS, including ETEs, bottleneck identification, and recommended improvements (e.g., hard-shoulder lanes on U.S. 50, roundabouts, signal timing), cross-referenced in Implementation Program 3.1-4 and Policy 3.3-11.
- Safety considerations are addressed in Policies 3.3-5 through 3.3-10 (on-street parking restrictions on narrow streets; compliance with CCR Title 14 emergency-access standards; traffic studies for new development to avoid exacerbating bottlenecks; infrastructure contributions; and related measures).

2.4 Evacuation Locations and Broader Emergency Response

- The Element ties into the County Office of Emergency Services / Rave Mobile Safety (Smart911) system for emergency alerts and references WEPS recommendations for ongoing public awareness of routes.
- Vulnerable populations are addressed (Policy 3.3-4 integrates access and functional needs considerations into evacuation and emergency response planning).
- Flood-related evacuation (cross-referenced to Senate Bill 99) confirms that all residences in 100-year flood zones have at least two evacuation routes.

2.5 Implementing Policies and Programs

The Element includes city-specific, actionable measures that flow directly from WEPS and the MJHMP:

- Policies 3.3-4 through 3.3-12 (access and functional needs equity; road standards; traffic studies for evacuation impact; infrastructure contributions; funding coordination per WEPS recommendations; and monitoring for supplemental non-wildfire analyses);
- Implementation Program 3.1-4 (inventory of substandard roads consistent with WEPS Section 5.0 recommendations); and
- Coordination with MJHMP actions and the CWPP/CWRS.

2.6 Timing and Trigger Compliance

- The MJHMP (including the Placerville Annex) was adopted November 12, 2024, triggering the § 65302.15 update obligation.
- This Safety and Noise Element is the vehicle for that update (following the 2021 Housing Element and the 2024 MJHMP).
- The Element also satisfies the Senate Bill 99 single-access identification requirement (no qualifying residential subdivisions lacking at least two emergency evacuation routes were identified).

3. Additional Notes

- The capacity/viability analysis is appropriately focused on wildfire scenarios (via WEPS's four modeled scenarios). Wildfire is the dominant hazard affecting approximately 50 percent of the City (Very High Fire Hazard Severity Zone). The statute does not require modeling every conceivable hazard when the incorporated document addresses the primary risks.

- The Element correctly distinguishes WEPS (scenario-based capacity and viability modeling) from Senate Bill 99 (single-access identification) and Assembly Bill 2140 (MJHMP incorporation for disaster-relief funding eligibility).

4. Bottom Line

The Safety and Noise Element does exactly what Government Code Section 65302.15 requires: it cites the statute, incorporates and summarizes the WEPS study (the document that performs the capacity, safety, and viability modeling under multiple emergency scenarios), identifies evacuation routes and locations, and adds implementing policies and programs. Upon formal adoption by the City Council, the City of Placerville will be in full compliance with § 65302.15.

Prepared for: Planning Commission Hearing, October 6, 2026

Case File: GPA 26-06 – Safety and Noise Element Update

Attachment to: Planning Commission Staff Report