



The New General Plans Public Comment Toolkit

An Introduction and Walk-through

October 1, 2025
11:00 AM – 12:30 PM



Supporting Rural Communities



- ☀️ 35 rural counties/health jurisdictions
- ☀️ Local Lead Agencies & competitive grantees
- ☀️ Other rural communities within urban areas



Today's Presenters



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Agenda

- ✓ How we Got Here
- ✓ General Plan Background
- ✓ Overview of the Toolkit
- ✓ Toolkit Walk Through
- ✓ Toolkit in Practice
- ✓ Q&A
- ✓ Next Steps





Participation

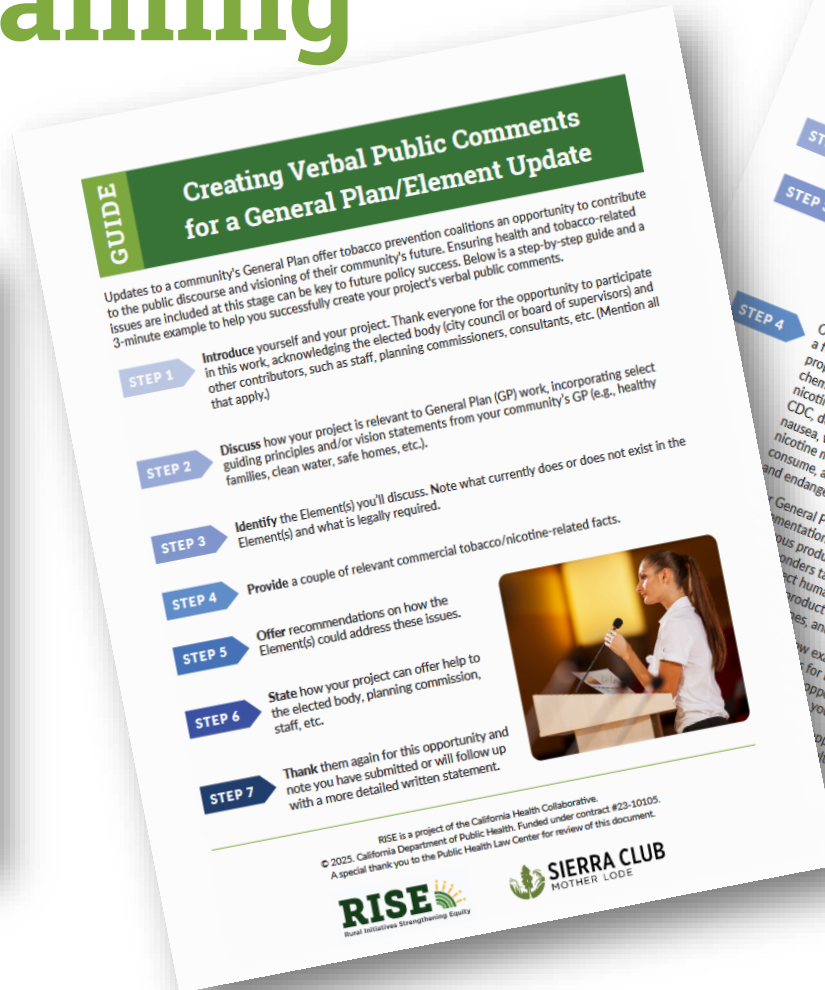
- ✓ Use the chat for general comments and feedback.
- ✓ Links in the chat.
- ✓ Use Q&A box for questions during presentation.
- ✓ Raise hand to bring your question live during Q&A.



The Path That Led Us Here...



2024 Rural GP Training



https://www.ca-rise.org/sites/rise/assets/File/FINAL_RISE-GP-Public-Comment-Outline-OFFICE-PRINT-25-0225.pdf





What is a General Plan?

"The general plan is more than the legal underpinning for land use decisions. It is a vision about how a community will grow, reflecting community priorities and values while shaping the future."

~Office of Land Use and Climate Innovation (LCI),
General Plan Guidelines



Three Defining Features:

General

- A general plan provides general policy guidance that will be relied on to guide future land use and resource decisions.

Comprehensive

- Covers a range of topics, such as land use, housing, economic development, recreation, natural resources, and much more

Long-Range

- A general plan provides guidance on reaching a future envisioned 20 or more years in the future. To achieve the vision, a comprehensive plan includes goals, policies, and actions that address both immediate and long-term needs



General Plan Elements (Gov. Code §65302)

Required

Land Use

Circulation

Open Space

Housing

Conservation

Noise

Safety

Sometimes Required

Environmental
Justice

Air Quality

Optional

Health

Community
Development





Available Resources

- ✓ [General Plans & Tobacco Control in California \(PHLC, 2021\)](#)
- ✓ Partners: CTPP General Plans focus area
- ✓ [Creating Verbal Comments for a General Plan/Element Update \(RISE, 2025\)](#)



Engagement Opportunities

- ✓ Public hearings: Planning commission, City council/BOS*
- ✓ Meetings, workshops, and events
- ✓ Surveys
- ✓ Community advisory body
- ✓ Email or other written communication
- ✓ Community website, email updates

* Required by law



General Outline of Planning Stages

Information gathering

Planning team is assembled and background research is conducted

GP Advisory Committee may be formed. Participation is advantageous

Existing conditions

Planners compile a report that includes existing conditions through sites visits, surveys, focus groups, etc.

Numerous opportunities for community engagement

Community vision, guiding principles, and goals

Community is encouraged to participate in development of the vision

Crucial opportunity to participate in this phase

Alternatives analysis

Planning Department (PD) presents various feedback obtained and selects the best possible option

Participate to ensure that the scenario selected takes into account your priorities

Draft preferred alternative/EIR notice of preparation and scoping

PD begins GP Update and the environmental impact report (EIR) required by the California Environmental Quality (CEQA)

Attend the scoping session to request scientific study that would help understand impacts and significance of tobacco on the environment

Draft General Plan/EIR

PD releases the preliminary draft GP and EIR for review

Review relevant sections to ensure tobacco language is included

Final GP/EIR

PD completes the update and EIR and public hearings are scheduled

If you submitted comments to the PD, you should have received a written response outlining agreement or disagreement on the comments.

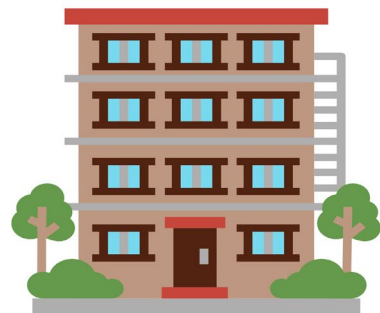
Adoption and approval

GP and EIR go through hearing with planning commission and then before City Council or County BOS

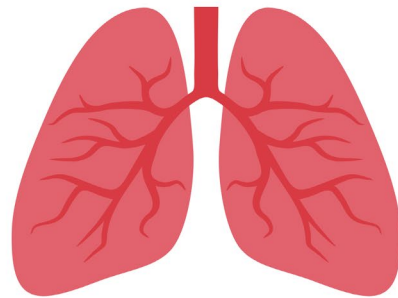
Attend public hearings to ensure proposed policies are in place



Key Tobacco Prevention Issue Areas



Multi-unit Housing



Outdoor Air

- ✓ Tobacco product waste (TPW)
- ✓ Tobacco retail (TR)
- ✓ Multi-unit housing (MUH)
- ✓ Secondhand smoke in outdoor air (OA)



Let's Hear From You!

Answer in the Chat...

- ✓ Share an example or statistic that illustrates how one of these key issue areas shows up where you live.





Who is This Toolkit For?

- ✓ CTPP project staff
- ✓ Coalition members
- ✓ Those interested in participating in a local general plan cycle
- ✓ Those with a foundational knowledge of general plans

This toolkit is **NOT** designed for public consumption



What the Toolkit Includes

- ✓ Data, studies, and key findings that support advocacy
- ✓ Summaries and legal requirements for general plan elements
- ✓ Best practice language
- ✓ Customizable public comment excerpts
- ✓ A table of comments for finding relevant topics and elements
- ✓ An overview of how to use the toolkit



Toolkit Walk Through



TOC & Template

Table of Contents

Topic 1) Tobacco Product Waste (TPW)	5
• Element Grouping 1: Land Use, Environmental Justice.....	5
• Element Grouping 2: Conservation & Open Space, Agriculture, Environmental Justice	8
• Element Grouping 3: Safety, Environmental Justice.....	12
Topic 2) Tobacco Retail (TR)	X
• Element Grouping 1: Land Use, Environmental Justice.....	X
• Element Grouping 2: Safety, Environmental Justice.....	X
• Element Grouping 3: Health, Environmental Justice.....	X
Topic 3) Secondhand Smoke Multi-Unit Housing (MUH)	X
• Element Grouping 1: TBD	X
• Element Grouping 2: TBD	X
Topic 4) Secondhand Smoke Outdoor Air (OA)	X
• Element Grouping 1: TBD	X
• Element Grouping 2: TBD	X

Topic Layout Template

Tobacco-related Topic

This area indicates which element(s) may be used to address the tobacco-related topic. Elements may be combined when there is significant overlap.

Applicable Element(s)	The element(s) that can be used to address the topic area. <i>NOTE: Not all communities are required to have an Environmental Justice Element, though environmental justice-related concerns are crucial and can be addressed in other elements. Therefore, you will see environmental justice-related information in each element grouping.</i>
Legal Requirement Summary	Federal and State statutes codify mandatory element requirements. The requirements that relate to commercial tobacco are summarized in plain language, with links and references to the specific legal codes for more details.
How Tobacco Prevention Priority Areas Can Be Addressed	Current CTPP Priority Areas: Area 1: Counter Pro-tobacco Influences Area 2: Reduce Secondhand Smoke Exposure Area 3: Reduce the Availability of Tobacco Products Area 4: Promote Tobacco Cessation. This section will note the relevant priority areas within this element and, <i>in italics</i> , how the best practice goals and policies can address it.
Evidence	Outlines the topic-related problem and citations for data that support the problem.
Relevant Resources	Additional resources that support the topic and element.
Best Practice Language	Language that a project/coalition can offer through the written public comment period. Included are the goals and policies that are the most protective of public health (End Game) followed by those that reduce accessibility and exposure to tobacco products. NOTE: End Game language is denoted with a (EG). Depending on community readiness, projects are encouraged to advocate for the most protective goals and policies. As opposed to plug-in model ordinance language, general plans vary from community to community. The best practice goals and policies listed here can be offered in written public comments with the understanding they may need to be modified and tailored by planning staff to fit your general plan format. Technical assistance, may be available through the Public Health Law Center.
Sample Verbal/ Written Public Comment Excerpt	Common language that can be used for providing verbal/written public comments to a governing body, such as a board of supervisors, city council, or planning commission. Can be used in conjunction with Creating Verbal Public Comments for a General Plan/Element Update Guide found on the RISE website.
References	Sources and citations for the information presented.



Element Legal Requirements

Applicable Element(s)	Land Use, Environmental Justice
Legal Requirement Summary	The primary function of the General Plan's Land Use Element is to lay out a pattern for a city or county's future development. It must address the type, intensity, and distribution of land uses within the jurisdiction and among other things, should be consistent with the natural resources conservation requirements of the Conservation Element. The Land Use Element should also reflect the community's vision; promote thoughtful, equitable, and accessible distribution of different land uses, including residential, commercial, industrial, agricultural and open space; and align well with other general plan elements." Gov. Code § 65302(a).¹ The purpose of the Environmental Justice Element is for cities and counties to identify objectives and policies to reduce the unique or compounded health risks in disadvantaged communities, to promote civil engagement in the public decision-making process, and to prioritize improvements and programs that address the needs of disadvantaged communities. Reducing pollution exposure, promoting safe and sanitary homes, and reducing any unique or compounded health risks in disadvantaged communities are some priorities in this element. Disadvantaged communities are areas identified by the California EPA (see mapping tool) and any other area that is low-income and disproportionately affected by environmental pollution, other negative health hazards, or environmental degradation. Gov. Code § 65302(h).¹



Data, Studies, and Key Findings



Evidence

- Tobacco product waste aggregates where tobacco retail stores are sited.^{2,3}
- Tobacco retail establishments are more densely located in low-income and communities of color.^{4,5} These communities are disproportionately designated as disadvantaged communities as defined by [Gov. Code § 65302\(h\)](#)¹ due to their higher exposure to various environmental hazards.⁶
- Cigarette butts are made up of thousands of plastic microfibers that contain thousands of toxic and carcinogenic chemicals from commercial tobacco smoke, such as nicotine, pesticides, polycyclic aromatic hydrocarbons (PAHs), arsenic, and heavy metals such as lead and cadmium.⁷

References

1. Cal Gov Code § 65302 (Amended 2024).
2. Araújo MCB, Costa MF. A critical review of the issue of cigarette butt pollution in coastal environments. *Environ Res.* 2019;172:137-149. doi:10.1016/j.envres.2019.02.005.
3. Marah M, Novotny TE. Geographic patterns of cigarette butt waste in the urban environment. *Tob Control.* 2011;20 Suppl 1(Suppl_1):i42-i44. doi:10.1136/tc.2010.042424.
4. Lowe AT, Maki A, Figueroa C, Venugopal PD. Place-based estimates of cigarette butt litter raise environmental justice concerns in the United States. *PLoS One.* 2024;19(8):e0308930. Published 2024 Aug 15. doi:10.1371/journal.pone.0308930.
5. Kong AY, Delamater PL, Gottfredson NC, Ribisl KM, Baggett CD, Golden SD. Neighborhood Inequities in Tobacco Retailer Density and the Presence of Tobacco-Selling Pharmacies and Tobacco Shops. *Health Educ Behav.* 2022;49(3):478-487. doi:10.1177/10901981211008390.
6. Flegal C, Rice S, Mann J, Tran J. California unincorporated: Mapping disadvantaged communities in the San Joaquin Valley. *Policy Link*; 2013. [Accessed April 28, 2025]. https://www.policylink.org/sites/default/files/CA%20UNINCORPORATED_FINAL.pdf.
7. Acarer Arat S. A review on cigarette butts: Environmental abundance, characterization, and toxic pollutants released into water from cigarette butts. *Sci Total Environ.* 2024;928:172327. doi:10.1016/j.scitotenv.2024.172327.



Best Practice Language

Best Practice Language

Designates
Endgame

EG

Goal: Phase out all commercial tobacco sales.

EG

Policy Adopt an ordinance prohibiting any commercial tobacco sales by [date].

EG

Policy (for jurisdictions with an existing TRL): Adopt an ordinance prohibiting the issuance of any new tobacco retail licenses; discontinue any renewals by [date].

EG

Policy: Remove any existing land use designation that permits tobacco retailer establishments.

Goal: Reduce tobacco retailer proximity to and density near open space and disadvantaged communities.

Policy: Restrict New Commercial Tobacco Retailers. Discourage new tobacco retail establishments (i.e., smoke shops, vape shops, grocery stores that sell tobacco products) to prevent addiction, encourage cessation, and reduce exposure to environmental hazards.

Policy: Cap the number of licenses issued in regions that meet the definition of “disadvantaged communities.” Licenses may be capped at zero (0), meaning no new license shall be issued.

Policy: Prohibit tobacco retailers from being located within one thousand



Sample Public Comment

Sample Verbal/ Written Public Comment Excerpt

Tobacco smoke contains over 4,000 chemical compounds, of which over 60 are known carcinogens. The EPA has classified nicotine as an "acute hazardous waste." Nicotine and other leachates seep into groundwater, posing a considerable risk of contaminating the food we consume and the water we ingest, bathe, and recreate in. Pets, wildlife, and people that ingest or handle tobacco product waste are at risk of poisoning.

Studies indicate tobacco product waste aggregates where tobacco retail stores are sited. Once littered, these items are difficult and costly to clean up and a significant portion will inevitably remain in the environment. Even when disposed of properly, these products release secondhand and thirdhand smoke and aerosols, which contaminate and degrade our land and waters.

With all of this in mind, and to meet our legal obligation for the land use element to lessen harm of our natural resources, it's important for our community to make sure that the concentration and location of these retail sites and products are not situated near vulnerable areas, such as the spaces where our young people spend time, where our food is grown, where families recreate and live, particularly those experiencing higher exposure to toxic hazards.



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Evidence

Legal
requirement
language



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Priority Areas

Goal &
Policy



Walk Through: How to Use the Toolkit



<https://www.ca-rise.org/resources/educational-materials/>



Example: Anytown's General Plan Update

- Anytown, CA is small town located in the Sierra foothills.
- It is doing a comprehensive update to their general plan.
- Many of its public lands are “high fire hazard severity zones.”
- It only has one fire station, located near a smoke shop.
- It will host a series of community listening sessions, focus groups, and tabling events to hear about key priorities from community members.
- You work for a local environmental organization and would like to see vape and tobacco waste addressed.



Q&A

Put your question in the Q&A box

OR

Raise hand to come off mute and turn
on your camera.





Next Steps



Powered By QuestionPro

- ✓ Fill out the post-training survey
- ✓ Access toolkit on the RISE website, PHLC website, & Partners on the GP COP page
- ✓ Stay tuned for upcoming sections
- ✓ Be on the lookout for opportunities to participate in your general plan update process
- ✓ Use the toolkit to craft written and verbal public comments
- ✓ Reach out for technical assistance



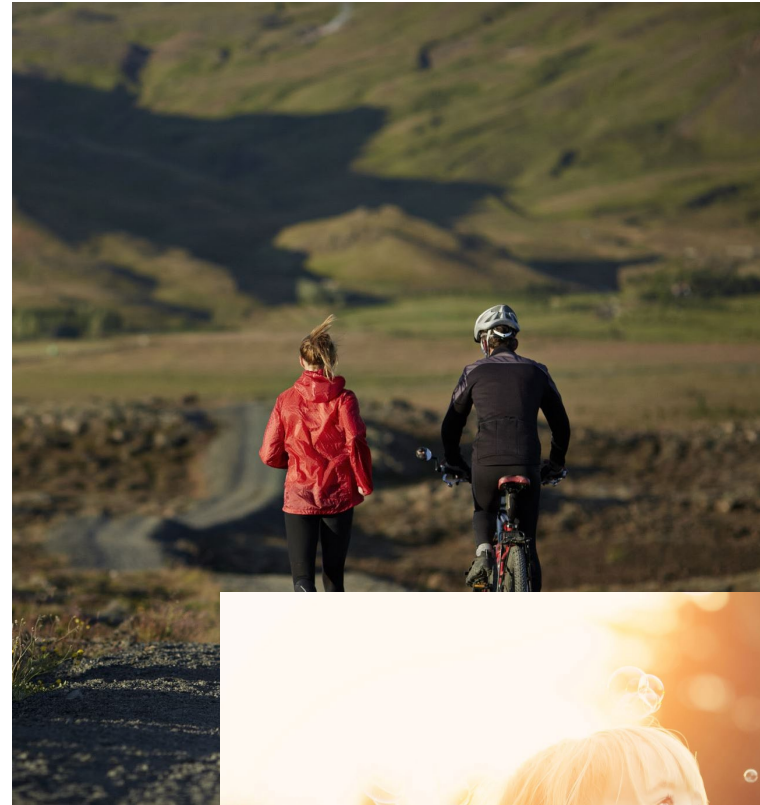
Closing Thoughts

Take Our
Survey >



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<https://surveyanalytics.com/t/AI0bYZO8t7>



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