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RE: CSAC Comments on Revised Draft Sustainable Communities Planning Grant and Incentives Program

Dear Council Members:

On behalf of the California State Association of Counties (CSAC), thank you for the opportunity to comment on the revised draft guidelines issued by the Strategic Growth Council (SGC) for its Sustainable Communities Planning Grant and Incentives Program prior to their adoption by the Council.

CSAC is generally supportive of the revised draft guidelines. As the Council knows, counties across California ranging from urban to rural have benefited from previous rounds of the grant and incentive program. To that end, CSAC appreciates that the guidelines highlight the program's intent to protect public health and the environment, promote equity, and strengthen the economy in urban, suburban, and rural communities.

The revised draft guidelines rightfully incentivize collaborative partnerships between applicants. CSAC encourages the Council to promote collaboration by requiring partnerships between regional applicants and local agencies for project proposals submitted by Councils of Governments (COGs), Regional Transportation Planning Areas (RTPAs), and Metropolitan Planning Organizations (MPOs). Specifically, the Council should consider including a similar collaboration requirement as the one included in the guidelines adopted in April 2010 that would require COGs, RTPAs, and MPOs to submit letters of intent to participate in proposed regional activities from impacted local agencies.

CSAC supports the addition of "regional regranting programs that enhance regional consistency of planning" to the list of examples of eligible projects under Focus Area #2. CSAC would also support specifying that such regional "regranting" programs are eligible under other focus areas, provided that funding continues to be awarded to applications across focus areas on a competitive basis. Regional agencies should be given incentives to develop creative "regranting" programs that leverage Strategic Growth Council grant funding with additional funding from the regional agency. Any regional "regranting" proposal should be required to identify the specific planning activities it intends to fund at the local level with Planning Grant and Incentive Program funds to ensure it competes fairly with other grant applications. CSAC could support a separate focus area limited to proposals for regional "regranting" programs so long as funding across each focus area is awarded competitively. If the Council elects to create a new separate focus area for "regranting" by regional agencies, the guidelines should be recirculated for additional review.

The revised draft guidelines use zip codes with scores in the top ten percent of the California Communities Environmental Health Screening Tool (CalEnviroScreen) to identify communities eligible

for the twenty-five percent environmental justice community set aside. CSAC supports special consideration for environmental justice communities, disadvantaged communities, and rural areas that may need additional support to address the planning issues that are the subject of the grant program. While the CalEnviroScreen measure is likely the appropriate rubric for identifying eligible communities in the context of the Sustainable Communities Planning Grant and Incentive Program, CSAC urges the Council to carefully consider the indicators included in the CalEnviroScreen tool and whether those measurements correspond with the goals of this program and future programs.

Furthermore, while future improvements to increase the granularity of the CalEnviroScreen tool may address the issue, the geographic distribution of the top ten percent of scores should also be carefully considered when program guidelines are devised. Currently, large portions of the state, including the Central Coast and *all* communities north of the Sacramento region, have no zip codes included the top ten percent of scores. This geographic distribution exists despite the fact that many communities in these regions have high (read: “negative”) scores on specific environmental and demographic indicators included in the overall measure, including poverty, linguistic isolation, educational attainment, asthma, proportions of elderly and child residents, number of solid waste sites, number of impaired water bodies, groundwater threats, and pesticide use.

Given CSAC’s position on the high speed rail project, we appreciate the flexibility afforded to applicants under Focus Area #3: Collaborative Community Planning in Preparation for High Speed Rail. While CSAC has supported the High Speed Rail Project (HSR Project) since early 2007, it has changed significantly in terms of the design, implementation, and cost of the proposed project. Counties have had over six years’ experience working with the Authority on the HSR Project and the identification of specific local impacts necessitated additional CSAC policy in 2011. CSAC identified seven priority issues critical to the successful implementation of the HSR Project, including the mitigation of local impacts, direct and indirect economic impacts, and conflicts with general and other local plans, to name a few. While high speed rail will present opportunities for communities where stations are proposed to plan for new types of development that can capitalize on the anticipated benefits of high speed rail service, including higher densities and mixed uses, the focus area also allows funding for communities that may instead need to plan for mitigation of impacts of the construction or operation of high speed rail, including the development of plans related to habitat protection and conservation, and the preservation of productive agricultural lands.

Once again, we appreciate the opportunity to comment on the SGC’s Sustainable Planning Grants and Incentives revised draft program guidelines. Please do not hesitate to contact me should you need any additional information about our feedback at 916/327-7500 ext. 566 or kbuss@counties.org. We look forward to our continued work together.

Sincerely,



Kiana Buss
Legislative Representative