



American Planning Association  
**California Chapter**

*Making Great Communities Happen*

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December 10, 2009

Cynthia Bryant, Director  
Governor's Office of Planning and Research  
1400 Tenth Street  
Sacramento, California 95814

Dear Ms. Bryant:

American Planning Association, California Chapter (APA California), appreciates the opportunity to provide the Strategic Growth Council and staff with comments on the Draft Guidelines: Proposition 84 Sustainable Communities Planning Grant and Incentives Program. We appreciate the Council and staff's recommendations for criteria to guide the Council in determining which sustainable planning projects deserve the much needed but extremely limited planning grant monies and provide the state with the greatest benefits in meeting its goals. We have organized our comments into five major areas:

**1. Focus on projects and proposal requirements that are specifically consistent with Prop 84, SB 732 and SB 375/Regional Blueprints.**

With limited grant monies, the broad eligibility requirements in the guidelines, although a good list of sustainability planning elements, do not give enough direction to either the Council or applicants and some requirements go beyond the requirements of Prop 84 and SB 732. In addition, implementation of SB 375 will be the planning priority of regional governments in the near future, followed closely by local governments. Therefore, consistency with and implementation of SB 375 **and** Regional Blueprints should be included as a proposal requirement in the guidelines.

Regional Blueprints, in particular, should not be overlooked in this process. While APA California fully supports the regional planning approach envisioned under SB 375, we also believe that the Blueprint planning process has yielded valuable results in several regions and these plans will, in fact, be the foundation for the Sustainable Communities Strategies under SB 375. Implementation of Regional Blueprint plans at the local level will help California get a head start on meeting the ultimate greenhouse gas reduction goals of SB 375.

APA California believes that the requirements from these three statutes, along with AB 32, will form the basis of the sustainable community planning proposals that the Council is targeting. And, as the Regional Targets Advisory Committee (RTAC) report pointed out, there are a number of co-benefits that result when GhG's are reduced that would include health benefits and many of the other broader goals without listing them specifically as eligibility requirements.

**2. The Guidelines should expressly allow funding for the development of Sustainable Communities Strategies under SB 375.**

The development of the SCS will be a significant undertaking for the state's MPOs and for the local government partners. SB 375 requires an unprecedented coordination of planning efforts for transportation, land use and housing, all aimed at reducing GhGs. The technical work will be daunting and the regional/local collaboration required to make this effort successful creates an additional cost for both the MPOs and local governments. As discussed in comment #4 below, the grant funding should be subject to a city and county/region split, with 80% of the grant monies allocated to cities and counties and 20% to the regions.

**3. Target funds to projects that can be completed within the next 2 to 4 years to help achieve the state's climate objectives.**

Depending on the region, it will be anywhere from 2 to 5 years before local governments are in a position to develop their own local plans to be consistent with a Sustainable Communities Strategy (SCS) under SB 375. The Guidelines must be careful not to shut out local governments due to the timeline of the grants; they cannot wait for SCS completion.

For example, for local jurisdictions that already have an up-to-date general plan, to make use of limited grant funds, grants could be steered to local governments that develop a robust and enforceable climate action plan as part of their General Plan, rather than attempting to fund full General Plan updates. These can be coordinated with regional efforts that are already underway, including Blueprint planning. The Bay Area Air Quality Management District (BAAQMD) is currently emphasizing climate action plans as the most effective way to address its new CEQA greenhouse gas (GhG) threshold. Climate action plans also emphasize plan-level review of climate change issues rather than project-level review, which APA California strongly supports. The BAAQMD has additionally developed standards for what would constitute an adequate plan for this purpose; those standards could be a starting point. The standards include enforceability and consistency with both AB 32 and longer-term GhG reduction goals that will set local governments on a trajectory to hit the Governor's 80%-below-1990 target for 2050.

Alternatively, jurisdictions with newly adopted General Plans want to take "the next step" in implementing their sustainable community vision with grant monies to support infill development and other policies consistent with strategic growth principles that forward SB 375 goals. These implementation

tools include updated zoning codes, specific plans, infrastructure plans, form based codes, targeted rezoning, updated development standards, transportation analysis, plans and ordinances to protect natural resources, farmland and open space, and CEQA review for any of the above – anything that will make it easier to develop and more likely that cities and counties will not be forced to subsidize development.

AB 32 and SB 375 implementation planning is a big need for local government and adoption of local climate action plans, implementation of sustainable community planning, and strategic growth principles should position local jurisdictions well for addressing the SCS when that is adopted.

**4. Ensure regional and local cooperation.**

The value of local/regional coordination should be substantially strengthened in the guidelines. Each application should clearly document how regional and local cooperation and involvement will be accomplished pursuant to any project submitted.

One way to strengthen local/regional cooperation is to allow the regions, along with the cities and counties in each region, to determine or recommend which projects meet the state grant criteria and are consistent with the Regional Blueprint or SCS. Further, APA California supports splitting the funding into two separate funding streams, with 80% of the grant monies allocated to cities and counties and 20% to the regions. This would ensure that the regions and city and county proposals are not forced to compete against each other for the funding given that they will be very different proposals. In addition, some grant monies should be set aside for rural and small communities which otherwise might not be able to successfully compete for the grants.

**5. Ensure that the grant application proposal requirements are realistic and within reach of small and large jurisdictions.**


The existing proposal requirements should be streamlined and simplified, and targeted to the goals to be achieved. For example, the current proposal requirements appear to steer all grant monies away from general plans and specific plans and to more development based and climate change based plans or to comprehensive regional plans. This may or may not be appropriate depending on the applicant (city, county, regional agency), the scope of the proposal for which the grants will be used, other sources of funding available to the applicant, and the planning status in the jurisdiction (updated general plan or outdated planning documents that should be updated prior to beginning implementation of AB 32 and SB 375). In addition, some proposal requirements, particularly metric and measurement requirements are premature if cities and counties plan to use the grants to develop those metrics as part of their planning process. Standard methodologies do not exist for some of these measurements and some metrics make little sense on a municipal level (e.g., air and water quality) and are beyond the capabilities of most jurisdictions, especially small jurisdictions.

APA California suggests that the proposed proposal requirements:

- Include a demonstration of need.
- Provide a separate proposal format and requirements for regions and local governments.
- Include questions related to the age and status of general plans and codes in the jurisdiction.
- Include a requirement to spell out specific goals to be accomplished, removing requirements to justify why some goals are not included in the proposal.
- Emphasize good comprehensive planning in determining which applications will be funded, ensuring that the applications link transportation, land use and housing, as well as recognizing social equity as an essential leg of sustainability.

APA California appreciates the opportunity to comment on the Guidelines and offer our assistance as this process is refined and completed.

Sincerely,

A handwritten signature in black ink, appearing to read "Pete Parkinson", is written over a horizontal line.

Pete Parkinson, AICP  
Vice President, Policy and Legislation