



December 10, 2009

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Cynthia Bryant, Director
Governor's Office of Planning and Research
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Dear Ms. Bryant:

The California State Association of Counties (CSAC) appreciates the commitment of the Strategic Growth Council (Council) and staff to develop thoughtful and productive Guidelines for the allocation of the *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 allocation of the extremely limited planning grant monies available for the purpose of meeting the State's climate change goals and to support the planning and development of sustainable communities.

CSAC supports you in this effort and recognizes the need to reach beyond SB 375 implementation to address the broader issue of support for sustainable communities and more strategic growth throughout the State. It is with this goal in mind that we offer the following comments:

Support Allocation of Funding 80% to Cities and Counties and 20% to Regions

We fully support the goals of SB 375 and recognize the need to support regions in the development of the enhanced planning requirements, in particular, the sustainable communities strategy (SCS) component of the regional transportation plan (RTP). However, recognizing that regions have dedicated revenue streams for planning purposes and that the timelines for preparation of the SCS throughout the State reach out several years, we believe the most effective investment at this time is to support climate change goals and sustainable communities through local plans and implementation of these plans. Thus, we believe the primary focus of these funds should remain with local planning that incorporates climate action goals and furthers the vision of sustainable communities. Further, with land use responsibility resting with cities and counties, planning level changes at the local level will not only inform better and more robust regional plans and SCSs, but remain critical for their successful implementation.

Support Various Planning and Implementation Efforts at the Local Level

CSAC supports narrowing the focus of the grants to various planning and implementation efforts that advance SB 375 goals, but also reach beyond the scope of the bill to support overall sustainability. While we certainly support plans for infill, higher density, transit oriented development, we also support the goal of protecting areas inappropriate for growth, such as protection of resource, open space and agricultural lands. Both are critical for more efficient and strategic growth. Further, while lending support to urban infill projects, not all of the growth expected to occur by 2030 or 2050 can reasonably be accommodated with infill and/or projects located in urban cores and/or within a transit corridor. While this type of growth remains an important part of achieving the State's GhG reduction targets, planning and implementation of more strategic development in the rural areas and urbanizing areas outside of urban cores is also a critical component.

Support Set-aside for Planning Efforts in 26 Regions outside of the 18 MPOs

Consistent with our support for more strategic growth outside urban cores and preservation of agricultural, resource and open space lands, we support a dedicated allocation of the funds to the 26 countywide areas outside of the 18 MPOs. Many of these areas are engaged in Blueprint planning and are pursuing more strategic growth efforts at the local level with little to no resources available to support such efforts. These areas play a role in the climate change effort either by providing protected lands that remain out of development or through more compact growth within rural towns both inside and outside of unincorporated areas.

Lastly, we have had an opportunity to review the comments provided by the American Planning Association, California Chapter, and lend our support for directing these planning grants to their more prescriptive list of various local planning and implementation efforts. We also concur with the comments provided by APA that suggest streamlining the proposal requirements or grant application.

Thank you in advance for your consideration of our comments. We would welcome further discussions as you find appropriate. My contact information is (916) 650-8104 or dbaker@counties.org.

Sincerely,



DeAnn Baker
Senior Legislative Representative

cc: Members, Strategic Growth Council
Gregg Albright, Deputy Secretary for Environmental Policy & Integration, Business, Transportation and Housing
Julia Lave Johnston, Senior Planner, Governor's Office of Planning and Research