June 27, 2018

Strategic Growth Council
Attn: Saharnaz Mirzazad
1400 Tenth Street
Sacramento, CA 95814

Re: Comments regarding the 2018-2019 Draft Program Guidelines for the Transformative Climate Communities Program

Dear Ms. Mirzazad:

First and foremost, thank you for allowing the City of Bakersfield (City) an opportunity to comment on the 2018-2019 Draft Program Guidelines (Draft Guidelines) for the Transformative Climate Communities (TCC) Program. We are not only enthusiastic to see the continuation of such an impactful program, but also to see the unrelenting growth of the Strategic Growth Council over the years. Notwithstanding, the City of Bakersfield offers the following comments on the Draft Guidelines.

Disadvantaged Communities Exemption for Cities with a High-Speed Rail Station Area Plan

In 2012, Governor Brown declared that high-speed rail was a priority for his administration, continuing his predecessor, Governor Schwarzenegger’s, support of a high-speed rail system. Since then, the high-speed rail has continued to materialize throughout the state of California. Furthermore, numerous jurisdictions have gone through extensive and collaborative planning activities to develop high-speed rail station area plans. In fact, the Bakersfield City Council recently approved the “Making Bakersfield” Station Area Vision Plan, including an Environmental Impact Report, which will serve as a plan to continue revitalization efforts and guide the future development in Downtown Bakersfield.

The Draft Guidelines also identify the importance of high-speed rail connectivity by setting forth additional TCC Program requirements for those jurisdictions with planned high-speed rail stations. However, many jurisdictions with high-speed rail station areas cannot meet the threshold to qualify under disadvantaged communities; consequently, those jurisdictions cannot qualify for the TCC Program.
Therefore, the City recommends providing a disadvantaged communities exemption only in high-speed rail station areas to those jurisdictions that have an approved plan. By the Strategic Growth Council adding requirements relating to workforce development, there will likely be substantial employment opportunities generated for those living in adjacent disadvantaged communities, especially near high-speed rail station areas. Ultimately, these employment opportunities have the potential to increase the median average income in disadvantaged communities; thus, achieving the Strategic Growth Council's goal of providing direct, meaningful, and assured benefit in disadvantaged communities.

Reduce Disadvantaged Communities Threshold to the Top 10 Percent

The Draft Guidelines state that a proposed project must have at least 51 percent of the geographic area overlap with census tracts within the top five percent of disadvantaged communities, per CalEnviroScreen 3.0. While a noble cause, meeting this threshold is difficult for many jurisdictions based on written comments from last funding cycle.

Therefore, the City recommends reducing the threshold to the top 10 percent of disadvantaged communities. This revision allows some flexibility in developing proposed projects while still providing tremendous benefits in disadvantaged communities.

Thank you again for your consideration of these written comments.

Regards,

[Signature]

Alan Tandy
City Manager
June 29, 2018

Dear Saharnaz Mirzazad,

We would like to thank the California Strategic Growth Council (SGC) for the opportunity to provide input on the updated Draft Guidelines for the Transformative Climate Communities Program (TCC). We commend your commitment to deepening community engagement in the critical planning, policy, and budget decisions at stake in TCC.

We are especially excited to see SGC follow the California Department of Transportation’s lead in including participatory budgeting in the guidelines for community engagement. As you may know, Caltrans’ SB 1 Sustainable Communities Planning Grant Guidelines state that $25 million a year in planning grants is available and eligible to fund local PB processes.

However, as participatory budgeting, or PB, is a relatively new practice in the U.S. over the past ten years, we urge SGC to take proactive steps toward educating TCC applicants and community members on the best practices that have emerged from PB processes in over 25 cities and agencies across the nation.

For PB to meaningfully address equity challenges, foster participation, and support the needs of marginalized communities, several key components should be implemented. First, PB processes should be designed and guided by steering committees of community stakeholders - especially organizations representing low-income, immigrant, and other traditionally underrepresented communities. Second, planning budgets must include resourcing grassroots organizations with roots in these communities to lead outreach efforts and engage their networks. Third, PB is most effective when centering community voice at each phase of the process - not only during the initial brainstorm and final vote on projects, but in the development of project proposals as well. Fourth, PB must explicitly place in the hands of a democratic vote of the community the ultimate decision on how funds will be spent.

We therefore propose that the updated TCC Guidelines include the following changes:
Amend the definition of participatory budgeting on page A-3 to read “Participatory Budgeting (PB) is a democratic approach to public spending that meaningfully and deeply engages people in government and the community. During PB, community members democratically decide how to spend part of a public budget, enabling them to make the fiscal decisions that affect their lives and the health of their communities. In PB, a community steering committee designs engagement and outreach strategies, while residents identify community needs, develop project proposals, and vote on which will be funded. PB is especially appropriate in low-income communities and communities of color that have been traditionally disenfranchised from transportation decision making processes.” (Emphasis indicates proposed new language)

Provide a reference in the Guidelines to Caltrans’ SB 1 Sustainable Communities Planning Grant Guidelines and state that this source of $25 million a year is available and eligible to fund local PB processes.

Indicate that the SGC will host one or more trainings and/or webinars on participatory budgeting as a community engagement model.

The Participatory Budgeting Project (PBP), one of the undersigned, has provided education, training, and technical assistance to cities and other public agencies across the country in implementing PB, including several in California, and is happy to offer our expertise in helping you design a training, and in otherwise providing technical assistance to prospective applicants in support of SCG’s community engagement goals.

Respectfully Submitted,

Shari Davis, Co-Executive Director, Participatory Budgeting Project

Richard Marcantonio, Managing Attorney Public Advocates Inc.

Álvaro Sanchez, Environmental Equity Director, Greenlining Institute
June 29, 2018  
Strategic Growth Council  
Attn: Sahamaz Mirzazad  
1440 10th Street  
Sacramento, CA 95814  

Via electronic submission  

RE: Transformative Climate Communities Program FY 2018-2019 Draft Program Guidelines  

Dear Strategic Growth Council:  

The Greenlining Institute commends the Strategic Growth Council (SGC) on the Transformative Climate Communities (TCC) Draft Program Guidelines for FY 2018-2019. We appreciate the opportunity to once again provide recommendations that we believe will strengthen the TCC program and build transformative change in California’s most overburdened communities.  

Areas of Concern & Recommendations:  

1. Grants restricted to the top 5% disadvantaged community census tracts.  
2. Financial capacity requirement.  
3. Workforce and economic development.  
4. Climate adaptation and resiliency.  

AREAS OF CONCERNS & RECOMMENDATIONS  

1. Grants Restricted to the Top 5% Disadvantaged Community Census Tracts  

We once again strongly disagree with the designation that Implementation Grants, and now Planning Grants as well, should be restricted to the top 5% of disadvantaged community census tracts.  

As we have noted previously, the California Environmental Protection Agency (CalEPA) has been tasked with identifying disadvantaged communities, communities disproportionately burdened by poverty and multiple sources of pollution, per SB 535 (de León, 2012) and AB 1550 (Gomez, 2016). CalEPA has consistently identified disadvantaged communities as the 25% highest scoring census tracts in CalEnviroScreen (CES).  

SGC’s interpretation that the TCC program should only apply to the top 5% of disadvantaged communities unfairly limits the pool of eligible communities who are otherwise deemed disadvantaged by CES, and undermines the directive and intent to targeted needed resources to
eligible disadvantaged communities. We believe in TCC’s transformative potential for communities, but this narrow and arbitrary interpretation limits the potential for catalytic change to only 66 cities throughout the state of California. Moreover, following last year’s determination that Implementation Grants would only be open to Fresno, Los Angeles and a third community, this administrative decision builds on a lamentable track record that indicates a lack of transparency and process around who is eligible to participate in the TCC program.

By limiting eligibility to only the top 5% of disadvantaged communities, this interpretation makes ineligible or limits half of last year’s Planning Grantees whose Planning Areas fall within the top 25% of disadvantaged census tracts. Of the 10 Planning Grants awarded last year, 3 are fully outside of the top 5% designation (West Oakland, Richmond and Eastern Coachella Valley) and 2 likely have portions of their geographic area fall outside of the top 5% (East Los Angeles and the Gateway Cities). These communities are currently embarking on planning processes in the hopes of winning a future TCC Implementation Grant.

Under the 5% determination, however, these Planning Grantees whose Planning Areas fall within the top 25% of disadvantaged census tracts are arbitrarily eliminated from consideration for Implementation Grants. We believe this to be disingenuous and damaging to TCC’s integrity, as these communities were hopeful that they could one day benefit from TCC capital investments and are still very much in need of transformative investment.

Instead, Planning Grantees will now be undertaking planning activities this year to build their capacity for... other California Climate Investment (CCI) programs. We recognize that increasing eligibility for other CCI programs was a stated aim of last year’s Planning Grants, but we understood this to always be secondary to the primary aim of increasing eligibility for future TCC Implementation Grants. They are considered Planning Grants under the TCC program and not under the general CCI rubric for a reason.

Looking to the future, limiting eligibility to the top 5% of disadvantaged communities also severely limits the ability to build much needed support for the program amongst both community stakeholders and the legislature. Cutting off eligibility to the top 5% immediately signals to many overburdened communities across California that TCC is not for them. This is the exact opposite impression that we need to be creating with the TCC program. It’s also shortsighted, when broad public support for and interest in the program is needed to build a pipeline of potential applicants, foster healthy competition and stimulate the most innovative projects.

As we have seen over the last two fiscal years, building legislative support for the program has also been extremely challenging. We must demonstrate to the legislature that TCC brings coordinated investments and real opportunity to overburdened communities, but this becomes unduly difficult when most legislators have not in fact seen the tangible impacts of TCC in their districts. Restricting TCC to the top 5% of disadvantaged community census tracts restricts the potential pool of legislators who might see TCC as a transformative opportunity for their constituents.

We strongly recommend that SGC expand TCC eligibility to the top 25% of disadvantaged community census tracts, for both the Implementation and Planning Grants. If SGC remains
immovable on this point, we recommend that additional points be awarded to projects that fall within the top 5% of disadvantaged census tracts, while allowing projects that fall within the top 25% to still be eligible to apply for TCC funding.

2. Financial Capacity Requirement

We are concerned that the financial capacity requirement could hinder the ability of community-based partnerships to successfully compete for TCC funding.

Requiring that Lead Applicants and Co-applicants must possess the financial capacity to pay expenses prior to seeking reimbursement from the State is an extremely high bar, and we fundamentally disagree with the assessment that financial capacity is determined by whether an applicant can pay expenses prior to seeking reimbursement. That an organization could not pay the upfront costs associated with a multi-million dollar grant does not in any way indicate that they then lack the organizational capacity, management capacity or proposal readiness in order to complete their project.

Administering grants by reimbursement serves as a huge barrier even for community-based organizations seeking much smaller, individual CCI grants. Given the extremely large size of the TCC grants, this barrier is only compounded for the TCC program.

Taken together with the management ability and proposal readiness requirements, we are concerned that the financial capacity requirement presents a significant challenge for many communities. Our experience providing technical assistance and working directly with stakeholders to leverage CCI tells us that many communities will struggle to understand, juggle and meet the multiple layers of complex readiness requirements.

We recommend that advance payment of grant awards be authorized so that all applicants who meet the organizational capacity and proposal readiness requirements can be competitive for TCC.

3. Workforce and Economic Development

We very much appreciate that workforce and economic development has now been elevated to a Transformative Requirement. We offer the following recommendations to strengthen the criteria and requirements around workforce and economic development.

a. Local Hire and Targeted Hire

We appreciate the focus on high-quality job creation for residents living within the Project Area, as we know that investments made within communities include both capital investments as well as local economic and workforce development impacts.
At the same time, we want to be cognizant of the economic dynamics of many low-income communities throughout the state. In low-income communities that are currently experiencing the pressures of gentrification, low-income residents are being priced out of the very communities that they call home. For an investment like TCC, this may mean that the community needs that a project is trying to address include the needs of both current residents as well as the needs of those who have been recently displaced.

We appreciate that the Guidelines include utilizing “targeted recruitment strategies” in bullet point (e) under the “Workforce and Economic Development” section of the Transformative Requirements. In addition to this bullet point, we recommend that the Guidelines also encourage targeted hiring for “individuals with employment barriers.” AB 1270 (Garcia, 2015) offers the following definition:\footnote{California Workforce Innovation and Opportunity Act, Assem. Bill 1270, (2015-2016), Chapter 94 (2015). \url{https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201520160AB1270}.}

- “Individual with employment barriers” means an individual with any characteristic that substantially limits an individual’s ability to obtain employment, including indicators of poor work history, lack of work experience, or access to employment in nontraditional occupations, long-term unemployment, lack of educational or occupational skills attainment, dislocation from high-wage and high-benefit employment, low levels of literacy or English proficiency, disability status, or welfare dependency, including members of all of the following groups:
  - (1) Displaced homemakers.
  - (2) Low-income individuals.
  - (3) Indians, Alaska Natives, and Native Hawaiians, as those terms are defined in Section 3221 of Title 29 of the United States Code.
  - (4) Individuals with disabilities, including youths who are individuals with disabilities.
  - (5) Older individuals.
  - (6) Ex-offenders.
  - (7) Homeless individuals, as defined in Section 14043e-2(6) of Title 42 of the United States Code, or homeless children and youths, as defined in Section 11434a(2) of Title 42 of the United States Code.
  - (8) Youth who are in, or have aged out of, the foster care system.
  - (9) Individuals who are English language learners, individuals who have low levels of literacy, and individuals facing substantial cultural barriers.
  - (10) Eligible migrant and seasonal farmworkers, as defined in Section 3322(i) of Title 29 of the United States Code.
  - (11) Individuals within two years of exhausting lifetime eligibility under Part A of Title IV of the Social Security Act (42 U.S.C. Sec. 601 et seq.).
  - (12) Single parents, including single, pregnant women.
  - (13) Long-term unemployed individuals.
  - (14) Any other groups as the Governor determines to have barriers to employment.

Thus we recommend that the following language be added to the Transformative Requirements for Workforce and Economic Development:
• (a). “Create workforce development and education training programs with career pathways for residents of the Project Area and individuals with employment barriers. Education and training can include pre-apprenticeship programs that are tied to state-certified apprenticeships; training programs that lead to occupations and industries that support TCC Proposal implementation, reduce barriers for and reflect the range of employment readiness needs of local residents and individuals with employment barriers, and partner with local workforce development boards and other key stakeholders, including organized labor and education providers; align and enhance high-performing education and training programs that have a proven record of leading to industry-recognized credentials and labor market advancement.”

• (b). “Explain how the TCC investment will result in economic development via the creation of high-quality jobs. The funds must be used to develop local, high-quality jobs that offer living wages, benefits, worker voice, predictable scheduling, and opportunities for advancement, with clear on-ramps for low-income residents and individuals with employment barriers in and near the Project Area. The jobs created may be directly tied to the infrastructure projects that are being proposed as part of the TCC Plan.”

We also recommend that this language be reflected in the scoring criteria for section II. Transformative Requirements:
• 1. “Describe how the Workforce and Economic Development Plan will fund training that leads to career pathways and high-quality jobs for residents of the Project Area and individuals with employment barriers.”
• 2. “Describe how the Workforce and Economic Development plan will lead to the creation of high-quality jobs for residents of the Project Area and individuals with employment barriers in industries related to the TCC projects.”

b. Quality Jobs

We offer the following enhancement to provide more specificity to the criteria for applicants proposing to use TCC funds for stand-alone workforce training programs:
• (e)iii. “Contract provisions: Contract provisions between a grantee and an applicant that include criteria for targeted hiring that provides quality jobs.”

c. Reporting Requirements

Data collection has long been the missing piece in targeted hiring policies. We should not have to wait for the Air Resources Board to develop a job creation assessment methodology for the TCC program to capture critical data around the economic and workforce impacts of TCC investments.

Under the requirements for applicants proposing to use TCC funds for stand-alone workforce training programs, we recommend that an additional criteria (g) be added concerning data collection. Reporting requirements are imperative to hold applicants accountable to their Workforce and Economic Development Plans. Last year, we offered comments on multiple occasions on the minimum levels of job and workforce reporting requirements that should be reflected in the Guidelines:
• Job Quality and Access -- number of individuals employed, hours per week, hourly wages, employer-provided benefits, worker demographics (income, race/ethnicity, location)
• Work Hours Performed -- by residents of disadvantaged community census tracts
• Number of Dollars and Percentage of Contracts -- that went to local businesses, specifically, minority, women, LGBTQ, and disabled veteran owned businesses.
• Number of Disadvantaged Community Residents -- enrolled in workforce development, pre-apprenticeship or apprenticeship programs.
• Workforce Development and Education Data -- number and types of certifications or credentials awarded, number of job placements for trainees/interns, number of trainees enrolled in pre-apprenticeship or state-certified apprenticeship programs, existing workforce and training partnerships with training providers, workforce agencies or community-based organizations.

d. 5% Cap on the Workforce and Economic Development Plan

In early 2018, the Greenlining Institute performed a landscape analysis of workforce development challenges and best practices in the Bay Area. We identified that one of the main challenges faced by workforce development programs was a lack of funding available for workforce training programs. When workforce development and training programs lack the appropriate resources for expenses such as trainee salaries and stipends, costs of tools and materials and public transit subsidies, higher barriers are created for students who cannot afford to participate in such a training program.

Given the high priority placed on workforce and economic development as a Transformative Requirement, we recommend increasing the budget available for Workforce and Economic Development Plans to 10%. Increasing the allocated amount to 10% would put the Workforce and Economic Development Plans commensurate with the amount allocated to community engagement and indirect costs. More crucially, it would allow the Workforce and Economic Development Plans to be appropriately funded to reduce the barriers to entry for residents and individuals with employment barriers.

4. Climate Adaptation and Resiliency

We appreciate that the section on climate adaptation and resiliency under the Transformative Requirements has been expanded. We offer the following recommendations to strengthen the requirements concerning climate adaptation, particularly as it relates to prioritizing community vulnerabilities and needs.

We are concerned that the data collection regarding a community’s climate change risks are heavily weighted towards statewide sources at the expense of data that comes directly from the community itself. Therefore, we offer the following enhancements. In section (a)i on identifying climate change risks and exposures, we recommend providing more specificity around the types of locally developed models that would be admissible.
3) Any other locally developed, down-scaled projection model, including those developed by community-based organizations.

In section (a)ii on describing the impact of climate change risks and exposures, we recommend that a fifth bullet point be added to allow for community-level data.

- 5) Any other locally developed sources, including those developed by community-based organizations.

We also offer the following enhancements to prioritize community needs.

- (b). Based on the identified risks for the Project Area and the impacts the community will face from those risks, Applicants must describe:
  - ii. What specific measures and programs will be incorporated into the design of the TCC Plan to safeguard vulnerable populations from the impact of climate change in the short-term and long-term, such as cooling centers, outreach activities to support vulnerable populations, etc. The TCC Plan to safeguard vulnerable populations from the impacts of climate change must be directly informed by the needs of residents and stakeholders as identified through the Community Engagement Plan.

CONCLUSION

We appreciate the opportunity to comment and make recommendations to the FY 2018-2019 Draft Program Guidelines and look forward to continue working with SGC to bring TCC goals to fruition.

Sincerely,

Emi Wang, Environmental Equity Program Manager
Alvaro Sanchez, Environmental Equity Director
The Greenlining Institute
June 29, 2018

TO: Strategic Growth Council

FROM: Alice Sung AIA, LEED AP,BD+C, ISSP-SA

Principal, Greenbank Associates

RE: Comments on Transformative Climate Communities Program, 2018 Draft Guidelines

Thank you for this opportunity to comment on the 2018 Draft TCC Program Guidelines. My technical background is as a longtime architect, with over 20 years in green building/infrastructure and a small consulting practice dedicated to green building and sustainability at scale. I offer the following comments as a citizen advocate for the transformational greening of our public K-12 schools as an integral part of any truly “sustainable community,” in alignment with our State energy, climate action, and sustainable development goals. The impact of housing on schools is obvious; but the potential to strengthen communities through school-community partnerships as implied by the TCC program process, should not be overlooked. The collaborative consideration of “greening” of them together, leverages all sorts of new opportunities for enhanced energy, water and waste reduction solutions, community scale solar, “resilience” through “cool centers” co-located within school facilities, GHG reductions with great educational outreach, and more. Directly involving local educational agencies and community colleges presents unique place-based opportunities for workforce development, training, and both educational and economic benefits within the green economy.

Additionally, other State agencies such as the CEC, CARB , and Building Standards Commission (CSBC) are integrating ambitious climate change action goals, advancing energy efficiency, moving to a 100% clean, renewable power grid with distributed energy and storage for resilience, zero net energy, green buildings, and decarbonization. It is critically important that the SGC take this time to coordinate with the other agencies to ensure that these Guidelines incorporate and reflect the advanced policies soon to be adopted in 2019 regarding green, high performance buildings, zero net energy and decarbonization (avoidance of new natural gas infrastructure and replacement with all electric (e.g. heat pump) space and water heating technology and induction cooking. Monies spent on these TCC projects, when completed, in 5-6 years from now, should reflect the best models of these zero carbon building goals, as opposed to mere business as usual with a few ‘green’ features. Zero carbon building is technically feasible now, and this level of performance (and its advantages in meeting GHG reduction goals!) should be encouraged now.

For these reasons, I urge the SGC to consider the following suggestions. Addressing these concerns harms no one. Not addressing them, may mean TCC projects miss the opportunity to inspire stronger, richer projects, directly sharing the benefits of zero carbon buildings in transformative climate communities, with and for, some of our most vulnerable population, our children.

FOR BOTH IMPLEMENTATION and PLANNING GRANTS

1. Please consider explicitly including Local Educational Agencies (public school districts) as well as local community college districts as eligible Partners, after item 3. “Support and Participation of Public Agencies” on Pg. 7

AND, consider mandatorily requiring them to be included as a stakeholder Partner or Special Advisor if the Project Boundary encompasses, or is adjacent to, or is within 1 mile of a public school or community
college campus, OR if the community served by the project consists of or will potentially consist of at least 25% school-age children.

2. RE financial capacity on pg. 8a.item iii, note that public school districts may not have the capacity or freedom of unencumbered resources to meet the same financial requirements as other sector entities. Typically, school districts can only “accept” grant awards up front, or pass-through invoices for any work completed. Please offer them some exemption, and work with any Partner to meet their grant funding structure.

3. Develop language throughout the Guidelines where referencing buildings, the built environment, infrastructure, etc. that aligns with the policy intent of the state energy goals: that of zero net energy, AND electrification/decarbonization. (work with CEC, DSA, etc.) See this link to the IEPR of the CEC:

http://www.energy.ca.gov/2018_energypolicy/documents/index.html#06142018
and comments docket in support of decarbonization of buildings:


4. Note in section “Climate Adaptation and Resilience” that green infrastructure development, ZNE buildings, decarbonization (avoidance of new natural gas infrastructure or building installation) =zero carbon buildings will be preferred.

5. Consider criteria for additional points for superior green building performance level, and innovations such as zero carbon building and or ZNE with decarbonization.

For PLANNING GRANTS

5. Please allow public school districts (LEA.s) and community college districts as Eligible Applicants to the planning grants. (see above #2. Also.)

6. Add explicitly as a recommended Partner under public agencies.

Thank you.
Dear Strategic Growth Council,

We are excited to be commenting on the second round of guidelines for the Transformative Climate Communities (TCC) Program and appreciative of the opportunity to do so. The TCC Program is an innovative approach to address historic underinvestment in the most environmentally and economically vulnerable communities across California through a collaborative community driven approach. Over the last year, the Strategic Growth Council (SGC) Staff has been a great agency to work with to ensure the first round of TCC funding remain true to the statute. We look forward to another year of this transformational program and below you will find our suggestions to improve the TCC Draft Guidelines.

I. Introduction

Under the background section, we recommend additional statute language emphasizing the requirement to engage communities in the development and implementation processes. As described within the law, recommended added language could state awarded grants must “demonstrate community engagement in all phases” (Pub. Resources Code § 75241a). Including this language within the first few paragraphs will emphasize the significance to the applicant and SGC of having meaningful and ongoing engagement with all community members. Furthermore, we recommend SGC expand the opportunity to apply for implementation grants outside of the top 5% communities to top 15% communities or those who meet AB 1550. Though the CalEnviroScreen tool is a helpful tool, we must recognize its shortfalls for communities who lack the data required especially for some of our most vulnerable populations. This includes rural neighborhoods, immigrant populations, and other communities who for various reasons do not or are not able to report data. We acknowledge this increases those communities who are eligible to apply, and would request to further discuss this with SGC Staff and other interested parties to find a resolution that ensures we are not excluding communities who need the most help simply because the data doesn’t reflect their reality.

II. Implementation of Grant Program Requirements

A. Applicant and Project Area Requirements
2. Collaborative Stakeholder Structure

The requirements laid out by SGC for what a Memorandum of Understanding (MOU) must have are commendable. Specifically, we appreciate the requirements to have described a “transparent decision-making processes”, a “non-discrimination clause”, and a “process for involving community representatives in decision-making”. In order to ensure the decision-making processes are open for all members of a community to participate, we suggest an added requirement or within “h. process for involving community representatives in decision-making” language be added stating an inclusive decision-making process for community members who would like to commit to ensure development and implementation of an awarded plan remain true to the community vision.

Within this same section, however, the Collaborative Stakeholder Structure agreeing to the MOU only requires that co-applicants be included. This is a problem if SGC wants to ensure a transparent and inclusive implementation and oversight process. We recommend there to be more explicit language requiring that some of those members be nominated and voted by community residents of the proposed project area. These meetings should be open to the public in an accessible location and time within the project area. Also, meeting notes and agenda should be recorded and posted in an accessible location for the community, like the library, in addition to a website.

4. Organizational Capacity and Project Readiness

We understand the SGC’s concern to ensure project applicants, both lead and co-lead, can fully implement the terms of the grant agreement. Nonetheless, SGC should also be weary they are not unintentionally excluding communities as a result of over burdensome requirements. One example is requiring the lead applicant to “provide evidence of...having successfully implemented a similar project in scope and size in California over the last ten (10) years”. We find this requirement of having implemented a project of similar “scope and size” to be unfair for smaller jurisdictions. These historically underserved communities should not be further burdened as they attempt to make their home more resilient in the face of climate change. So we can ensure applicants and co-applicants are capable of implementing awarded projects, while also be cognizant that not all communities have had the opportunity to carry out a project of similar size, we recommend to remove the language of “scope and size”. This acknowledges that not all communities have had equitable level of investments and thus cannot be expected to have that similar experience.

As this second round continues, we recommend to modify the requirement that the applicants must have capacity to pay for expenses prior to seeking reimbursement. These further disadvantage otherwise qualified applicants and continues to pose a barrier for the severely disadvantaged communities this program is intended to benefit. We suggest SGC instead allow for advance grant payments in order to further the goals of the TCC program of investing in top 5% of most impacted communities. If funds are not spent accordingly, the SGC, through grant agreements, shall request return of funds and put forth additional repercussions in addition to those already stated, such as prohibiting from applying for future TCC cycles or other California Climate Investment Programs. These specific grant agreements can be modified on a case by case basis; however, applicants should not be considered simply because they do not have the financial capacity to pay for projects before receiving the grant.

5. Project Area Requirements
We strongly recommend SGC allow disadvantaged unincorporated communities (DUCs) to be eligible to apply for implementation grants. As guidelines from the first round allowed unincorporated communities to apply for planning grants, we recommend this to be expanded to implementation grants. Not allowing DUCs to apply for implementation grants will fail communities who were already awarded like the Eastern Coachella Valley (ECV) region which includes the City of Coachella and four DUCs: Thermal, Oasis, Mecca, and North Shore. These communities have been historically marginalized and excluded, often because of their geographic characteristics and DUC categorization. In initiating the TCC planning grant process, residents of the awarded communities are grateful to finally see meaningful investment in their communities, with the perception that this project is a first step to actual infrastructure and resource development in the area. However, the exclusion of DUCs in the implementation grant application process means that the ECV communities will be developing a plan leading to no future opportunity to implement such projects under the same mission and goals of TCC.

This would also be contrary to the goals set out by AB 2722, the state’s planning priorities and specific objectives of the TCC program. Requiring the project area be within the boundaries of a single city, exclusive of unincorporated communities, is especially problematic for disadvantaged fringe and island communities. In fact, this exclusion will only serve to perpetuate decades of exclusionary and discriminatory land use decisions that have, in many occasions, kept low income neighborhoods and communities of color out of cities. To confront and overcome the decades of poor planning and discriminatory investment, the SGC must allow – even encourage - inclusion of unincorporated communities in TCC projects.

In addition, DUCs like the ECV are only able to qualify for TCC projects, planning or otherwise, if they are a top 25% community as defined by CES. The current requirement of communities to be within the top 5% tier would not have provided the opportunity to communities like the ECV to compete at all. This requirement is yet another form of excluding both rural, low-density, and geographically diverse communities. Evidently, reducing the requirement from 5% to 25% would allow more rural communities to benefit from programs like TCC and urge that this change be made for the implementation grants as well.

7. High Speed Rail Connectivity

As previously mentioned in comment letters for the first round of guidelines, we remain concerned about the high-speed rail connectivity requirement laid out in the draft guidelines. As is written, this language can be interpreted to mean that only the blocks surrounding the High-Speed Rail (HSR) station can be used to meet this requirement. We recommend SGC amend these sections below to ensure that the connectivity requirement is not solely met by the immediate vicinity, but also nearby surrounding neighborhoods that could be connected. This language can be included in a footnote further defining that a surrounding neighborhood to the HSR Station is not exhaustive to the immediate surrounding community, but neighborhoods identified within the five-square mile planning area. Furthermore, we would like SGC ensure those cities listed in Appendix C who will be home to a HSR station meet the eligibility requirement of the rail station area having 51% or more of the proposed planning area within a top 5% community as defined by CES.

B. Transformative Requirements

2. Avoid the Displacement of Existing Households and Small Businesses
It is evident avoiding displacement of existing residents and small businesses is a priority to SGC. Avoiding the economic displacement of low-income community residents and small business owners is clearly written throughout the guidelines. We commend SGC for the proactive efforts that will safeguard some of the most vulnerable community members from being displaced from their home or place of work. To further safeguard and preserve an existing community we recommend that under “2. Avoid Displacement of Existing Households and Small Businesses” extremely low-income households be included in addition to vulnerable populations, which includes but is not limited to the homeless, seniors, persons with disabilities, immigrant and undocumented populations, domestic violence victims, formerly incarcerated individuals, and farmworkers. As affordable housing units are created either directly through TCC funding or through the establishment of one of the policies listed in Table 2, we recommend SGC prioritize applications that make units available for a range of demographics and not primarily low-income.

Additionally, we appreciate Table 2: Example Policies to Avoid the Displacement of Very Low and Low-Income Households. This table includes a number of policies shown that when implemented collectively, they’re successful in preventing displacement of existing community members. In order to strengthen Table 2, we recommend that quantifiable thresholds be added to some of the policies and programs that demonstrate preventative action. For instance, “Production of family-sized rental and ownership affordable units” can be a good policy, however, if only a few units are created it wouldn’t safeguard against displacement in the community; also, “Housing bond to fund affordable unit development” does not state what percentage of the units have to be affordable and at what levels. Also, under the policies for small businesses one of them allows applicants to simply increase the visibility of the small business assistance programs. Again, this policy seems very subjective and metrics should be provided accordingly to ensure it benefits small businesses.

Under section 2.a.iii where it is further discussing the requirement of adopting three anti-displacement policies for households and two for small-businesses, we recommend to make more explicit the point that these new policies must be new. Currently, this is the only section where this requirement is noted and it is written in a way that could be potentially looked over. Instead, we suggest for this section to directly state that these minimum five new policies or programs be completely new to the community. Within this same section 2.a we recommend SGC add the following two points:

1. The jurisdiction where applicant is seeking funding for must have a compliant Housing Element with current Annual Progress Report demonstrating they are meeting state housing law.
2. Applicants must engage community in deciding which anti-displacement policies to pursue, and demonstrate how community input was incorporated into choosing the policies.

Below you will find a table with additional recommendations to add, modify, or eliminate policies to further protect existing residential and small-business tenants through meaningful policies and programs, so they are not displaced after millions of dollars are invested in their community.
<table>
<thead>
<tr>
<th>Category</th>
<th>Policy</th>
</tr>
</thead>
</table>
| Production of Affordable Housing | **Additional:**  
|                                  | • Linkage fee on warehouses, distribution centers, or any industrial   |
|                                  |   development not providing a prevailing wage dedicated to affordable  |
|                                  |   housing development                                                 |
|                                  | **Eliminate:**  
|                                  | • “Demonstration of application to local, state and federal programs to  |
|                                  |   fund affordable housing production”                                  |
|                                  |   o This is something all jurisdictions should already be doing        |
|                                  |   without further incentives from the TCC Program.                     |
| Preservation of Affordable Housing| **Additional:**  
|                                  | • Linkage fee on warehouses, distribution centers, or any industrial   |
|                                  |   development not providing a prevailing wage dedicated to affordable  |
|                                  |   housing development                                                 |
|                                  | **Modify:**  
|                                  | • “Restrictions on short-term rentals”                                  |
|                                  | • “Restrictions on non-primary residences”                             |
|                                  |   o The two aforementioned policies should be more explicit as to     |
|                                  |   how it will support with the preservation of affordable housing     |
|                                  | **Eliminate:**  
|                                  | • “Demonstration of application to local, state and federal programs to  |
|                                  |   fund affordable housing production”                                  |
|                                  |   o This is something all jurisdictions should already be doing        |
|                                  |   without further incentives from the TCC Program.                     |
|                                  | • “No-net loss of affordable housing units/net gain of affordable units”|
|                                  |   o This is a Housing Element requirement                              |
| Tenant Protections and Support   | **Modify:**  
|                                  | • Tenant legal services                                                |
|                                  |   o Should include language that requires a right to counsel in        |
|                                  |   eviction proceedings. Despite having legal advice, what we’ve       |
|                                  |   seen individuals want and need in these situations is legal         |
|                                  |   representation in court where a majority if not all landlords have   |
|                                  |   an attorney represent them and taking advantage of tenants.         |
|                                  | • Efforts to maximize acceptance rental subsidies                      |
|                                  |   o This should read “Maximize acceptance of rental subsidies” and    |
|                                  |   an quantifiable threshold should be added to measure its            |
|                                  |   success. This can be demonstrated by increased single family        |
|                                  |   housing units accepting rental vouchers, or in higher opportunity    |
|                                  |   areas.                                                               |
|                                  | • Identify opportunities to acquire privately owned and managed SRO    |
|                                  |   buildings                                                           |
|                                  |   o This should also include opportunities to acquire Mobilehome       |
|                                  |   Parks                                                               |
|                                  | • Improve code enforcement in SROs                                    |
|                                  |   o This should also include improving enforcement in Mobilehome       |
|                                  |   Parks                                                               |
|                                  | **Additional:**  
|                                  | • Where applicable, assessing enforcement of nuisance policies and     |
|                                  |   modifying as needed to ensure vulnerable populations are not being  |
|                                  |   negatively impacted.                                                |
|                                  |   o For instance, Fresno City adopted a nuisance ordinance that       |
|                                  |   could give a landlord the right to evict a victim of domestic       |
|                                  |   violence if the victim calls the police. The way the policy was     |
written does not give protection in these instances and this type of ordinance has been seen to do just this in other states.

- Create an emergency housing response action plan for instances when code enforcement deem the properties uninhabitable

**Eliminate:**
- Limiting tenant evictions from affordable housing
- Review of occupancy requirements to create greater flexibility for tenants

<table>
<thead>
<tr>
<th>Protection for Small Businesses</th>
<th>Modify:</th>
</tr>
</thead>
</table>
|                               | - Advocate for commercial rent control
|                               |   o This should require adoption of commercial rent control, not just advocacy. |

3. **Ensure Community Engagement**

As the TCC Program has evolved, we recognize and appreciate SGC Staff and Council efforts to ensure applicants are held accountable in involving community throughout all phases of the grant. As the guidelines were developed for the first round, SGC Staff was open and responsive to community’s suggestions as to how they could be better engaged throughout the process. We commend SGC Staff’s commitment to the community by ensuring open lines of communications between them throughout the entire process, from the development of the guidelines, to the plan proposals and awards, up until today as the plans begin implementation.

In this same light, we appreciate the improvements within the community engagement section of the guidelines requiring applicants to be more intentional about meaningfully including all community members. Aside from additional recommendations shown below for Table 4: **Recommended Activities to Ensure Meaningful Community Engagement**, we thank Staff for improving how a community can be meaningfully engaged in a multi-million dollar planning process through robust, transparent, and inclusive engagement.

<table>
<thead>
<tr>
<th>Category</th>
<th>Activities</th>
</tr>
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</table>
| **Activities to Inform Community Stakeholders and to Solicit Stakeholder Input** | • Ads and appearances on local English and non-English radio and TV shows
| | • Community office hours where residents have an opportunity to drop in to discuss various matters in a location convenient for the neighborhood
| | • Distributed flyers or other printed materials at schools, community centers, libraries, and other common spaces within the community
| | • Subcontract with faith-based, community-based, and other formal and informal organizations already working in the community
| **Activities to Engage Community Stakeholders in DEvelopment of TCC** | • Community office hours where residents have an opportunity to drop in to discuss various matters in a location convenient for the neighborhood
| | • Convene advisory body or shared decision-making body chosen in an inclusive and transparent manner
Activities to Ensure Community Engagement During Implementation of TCC Plan

| Subcontract with faith-based, community-based, and other formal and informal organizations already working in the community |
| Identify existing meetings held within the community |

Activities to Ensure Community Engagement During Implementation of TCC Plan

| Community office hours where residents have an opportunity to drop in to discuss various matters in a location convenient for the neighborhood |
| Subcontract with faith-based, community-based, and other formal and informal organizations already working in the community |
| Identify existing meetings held within the community |

5. Other

There is a minor typo at the top of page 18 under section 5.b.iii where “to reduce” is repeated, and in the footnotes of page 20 where the 31st footnote is written as 30.

III. Planning Grant Requirements

A. Applicant and Planning Area Requirements

Unlike last year, the current draft guidelines no longer allow disadvantaged unincorporated communities as defined in the top 25% of the CalEnviroScreen (CES) to apply for Planning Grants. We strongly encourage SGC to modify current draft guidelines to expand eligibility. The recommendation is to allow disadvantaged unincorporated communities found in the top 15% in CES or meet AB 1550 (Gomez, Chapter 369, Statutes of 2016) to be eligible to apply for planning grants. Failing to do so would be contrary to the goals set out by AB 2722. Requiring the project area be within single city boundaries does not only restrict innovation as adjacent unincorporated areas are ineligible, but also excludes hundreds of communities from participating in efforts to transform neighborhoods just as or even more vulnerable to climate impacts.

Excluding disadvantaged unincorporated areas from the benefits of these programs not only fails thousands of residents eager to improve their neighborhoods, but also does not allow some of the communities who were awarded planning grants from the first round to apply. Furthermore, restricting planning grants to solely incorporated communities fails to acknowledge opportunities for rural resiliency and planning efforts underway to address conditions in these areas such as implementation of SB 244, development of RTPs, SB 1000, and other planning efforts. It would be unfortunate to minimize the reach and effect such innovative programs can have to transform communities while also reducing greenhouse gases. Lastly, under current eligibility requirements, Prop 84 allows disadvantaged unincorporated communities to receive planning grant dollars.

Conclusion
Thank you again for the opportunity to comment on the second round of funding for the Transformative Climate Communities Program. This is an exciting time for community members, organizations, and agencies as they prepare to apply for such a holistic program that if implemented meaningfully, could create lasting change to improve the community’s quality of life. We appreciate our dialogue with staff to date and look forward to an ongoing rich and robust community process guaranteeing community engagement in all phases of the project. If any questions should arise, please contact Grecia Elenes at (559)369-2790 or gelenes@leadershipcounsel.com.

Sincerely,

Grecia Elenes
Leadership Counsel for Justice and Accountability

Sandra Celedon
Building Healthy Communities

Dolores Barajas-Weller
Central Valley Air Quality Coalition

Genoveva Islas
Cultiva la Salud
July 2, 2018

California Strategic Growth Council (SGC)
1400 Tenth Street
Sacramento, CA 95814
Attn: Saharnaz Mirzazad
tccpubliccomments@sgc.ca.gov

RE: Comments on the draft Guidelines for the Transformative Climate Communities (TCC) Program, Year 2

Dear Strategic Growth Council,

Thank you for the opportunity to provide comments on the draft Guidelines for the Transformative Climate Communities (TCC) Program. We greatly appreciate SGC’s commitment to strong community outreach and willingness to include public input during the development of this important program. We look forward to seeing these efforts continue into the future to ensure a fair, effective, and transparent process for this program.

The California Environmental Justice Alliance (CEJA) is statewide, community-led alliance that works to achieve environmental justice by advancing policy solutions. We represent approximately 30,000 residents throughout the San Francisco Bay Area, San Joaquin Valley, Los Angeles, Inland Valley, Central Coast, and San Diego / Tijuana areas. CEJA’s membership is comprised of ten different community-based organizations that work in partnership with local residents to win important environmental justice (EJ) solutions, including the following organizations: Leadership Counsel for Justice and Accountability, the Center for Community Action and Environmental Justice (CCAEJ), Strategic Concepts in Organizing and Policy Education (SCOPE), and Physicians for Social Responsibility - Los Angeles (PSR-LA), among others.

In 2016, CEJA was a co-sponsor of AB 2722 (Burke), which created the TCC program. (For more background on CEJA’s initial vision for TCC, please see our 2016 report, Transformative Climate Communities: Community Vision and Principles for a Successful Program.) As an alliance that is centered on EJ and sustainable and equitable community development, we appreciate the draft Guidelines’ recognition of the importance of community-led planning efforts,
as well as its focus on engaging residents throughout proposal development and implementation, and long-term and cross-sector partnerships. We hope that the final TCC Guidelines will be effective in setting up the program to truly carry out these aims during implementation.

Reflecting upon the draft TCC Guidelines (Guidelines) as well as our lessons learned from Year 1 of the program, CEJA recommends the following additions and changes to the Guidelines for Year 2:

1. Project Area Requirements and Disadvantaged Communities

*Recommendation #1: Broaden Implementation Grant eligibility to allow a greater number of under-resourced disadvantaged communities to apply.* While Year 1 of the TCC Program restricted Implementation Grants to “the most disadvantaged communities” with a majority of census tracts in the top 5% of CalEnviroScreen 3.0 (CES 3.0) results, opening up the TCC Program’s eligibility is crucial to allowing a broader array of highly impacted and historically disinvested communities to receive catalytic investments. By restricting the program to majority top 5% disadvantaged communities (DACs), additional communities that are working on promising neighborhood-level plans in areas such as the Coachella Valley, the southern San Joaquin Valley, and the Bay Area would be ineligible to apply for these grants. This issue is especially challenging for our state’s rural communities where pollution or socioeconomic data may be missing or unavailable within CES 3.0.

CEJA is also concerned that limiting TCC Implementation Grants to majority top 5% DACs would be inconsistent with Year 1 of the TCC program, in which communities with majority top 25% DACs could apply for TCC Planning Grants. As one of the main stated purposes of the TCC Planning Grants is to set up additional communities to apply for future TCC Implementation Grants, we fear that this overly restrictive eligibility requirement would be incongruent with the TCC Guidelines for Year 1, would be unfair to a number of Planning Grant awardees, and would undermine some of the goals behind the Planning Grants.

As a statewide alliance, CEJA believes that top 25% DACs should be eligible to apply for TCC Implementation (and Planning) Grants. At the same time however, we recognize that this standard of eligibility, with the ultimate goal of targeting GGRF program awards for “the most disadvantaged communities,” may not be appropriate for all regions of the state, such as the Los Angeles region which contains a large number of top 25% DACs.

To address these concerns, CEJA would like to meet with SGC further before the Guidelines are finalized to develop an Implementation Grant eligibility threshold that makes sense for Year 2 of the TCC program. Alternative options for eligibility could include: (1) allowing communities containing a majority of census tracts within the top 10% or top 15% of CES 3.0 results to apply for TCC Implementation Grants during Year 2 of the program; and (2) employing a geographic-based formula that focuses on a county’s proportion of top 5% DACs in the state.
Such options would enable highly impacted DACs in different regions across the state to access TCC’s transformative investments, while maintaining some eligibility parameters that address the high level of need and targeting to “the most disadvantaged communities” in regions like Los Angeles, and would fall more in line with the stated goals of the TCC Planning Grants.

**Recommendation #2: Allow top 25% DACs to be eligible for Planning Grants.** Similar to the reasons stated above, CEJA recommends broadening TCC Planning Grant eligibility to allow communities containing mostly top 25% DACs to apply for Planning Grants. Such eligibility would be consistent with Year 1 Guidelines for the TCC program in which top 25% DACs were allowed to apply for Planning Grants, and would support the development of promising and innovative plans in some of our state’s most historically neglected and politically disadvantaged communities. Increasing access to planning grants for the top 25% DACs would also allow for these communities to meet project readiness requirements of other GGRF programs and would broaden the reach of the TCC Program into those communities that may not be eligible for Implementation Grants under the current interpretation of the statute language.

**Recommendation #3: Broaden Implementation Grant and Planning Grant eligibility to allow disadvantaged unincorporated communities to apply.** Since Year 1 of the TCC Program allowed unincorporated communities to be eligible for Planning Grants, the Guidelines should continue to include disadvantaged unincorporated communities as eligible plan areas for both Planning Grants and Implementation Grants. Too often, as demonstrated by these draft Guidelines, residents in unincorporated disadvantaged communities are restricted from applying for grants to improve their neighborhoods due to misperceptions of what is happening on the ground. Common assumptions that rural communities have too little vision or capacity to make transformative changes are outdated and inaccurate. For instance, some of CEJA’s member organizations that work in rural Central Valley, as well as other community-based groups and resident leaders, are increasingly working with local agencies to bring sustainable infrastructure into unincorporated communities that are disproportionately impacted by the same environmental burdens as incorporated communities.

Large scale funding from programs such as TCC is critical to supporting the grassroots capacity-building and community-led visioning efforts already underway in these neighborhoods to build greener, cleaner rural communities in the long term. CEJA believes that SGC could play an important role in remedying some of the historic resource inequities facing these unincorporated communities by awarding both Planning and Implementation Grants so public agencies can increase their capacity to advance grassroots efforts for transformation.

2. **Eligibility Requirements: Financial Capacity**

**Recommendation #4: Provide alternatives to the Guidelines’ financial capacity requirements to allow historically under-resourced disadvantaged communities to access TCC Implementation Grant and Planning Grant funding.** By requiring applicants to pay upfront for any TCC-related expenses prior to seeking reimbursement from the state, many small local governments and other public agencies that do not maintain large budgets would be excluded from applying for a
TCC grant. As a result, the Guidelines’ eligibility requirements unfortunately privilege highly-resourced applicants. While CEJA understands the need to ensure successful project completion, we worry that smaller jurisdictions, rural communities, and other more historically under-resourced communities that are working on excellent plans for local transformation would be excluded from the program. Serving our state’s most under-invested communities is important in following with the spirit and the intent of TCC. For instance, while a number of Inland Valley communities have been developing plans that would be a good fit for the TCC program, very few cities outside of the City of Ontario would be able to apply for the program due to this financial capacity requirement. This is troubling, as the Inland Valley contains many communities that have some of the highest pollution burdens in the state (if not the nation) and very low access to resources or protections for overburdened residents.

During past comment periods, CEJA has suggested a couple of alternative solutions such as allowing grantees to maintain escrow accounts with the state and permitting partial advance payments. For the TCC Planning Grants, one CEJA partner recommends the following policies to increase TCC grant accessibility to more high need EJ communities: (1) Disburse 10% of a grant upon full execution of the contract. (2) Allow monthly invoicing instead of quarterly invoicing. (3) Do not withhold 10% of payment on each invoice until the grant is completed.

3. Applicant Requirements
Recommendation #5: Require MOUs between Lead Applicants and Co-Applicants to delineate decision-making processes and abilities amongst all parties—from designing the final TCC grant application to the implementation of awarded plans. During Year 1 of the TCC program, some community-based organizations that participated in a TCC Implementation Grant application reported that Lead Applicants were not always very transparent nor inclusive of their ideas when making the final decisions for the applications. As a result, one submitted grant application unfortunately failed to include important Co-Applicant input that would have strengthened the final submitted proposal. To avoid such conflicts and to increase Co-Applicants’ (especially community-based groups’) ability to have a voice in both proposal design and plan implementation, CEJA recommends clarifying the requirements in Section II.A. to state that MOUs should also establish clear decision-making roles and abilities for all parties that agree to play a role in applying for and implementing a TCC Implementation Grant.

4. Strong and Meaningful Community Engagement
Recommendation #6: Require Implementation Grant Applicants to demonstrate how community input and recommendations were included both in the final decisions of a grant application as well as the implementation of awarded proposals. In order to prove that an Applicant’s community engagement activities have led to concrete decisions within the final TCC Implementation Grant application, we recommend that such processes be documented and included within all proposals using a narrative format. Such a process should also align with the stated goals and activities of an Applicant’s the Community Engagement Plan. In addition, we recommend that all TCC-funded plans respond to community input and recommendations in writing so that those who participated in an Applicant’s community engagement activities
understand how and to what degree their input was used to inform the development of a TCC proposal and an implemented plan.

Maintaining transparency and responsiveness to community feedback is critical to ensuring that community members’ voices are included within all plans that have been designed to benefit local neighborhoods. Unlike the City of Fresno’s process in which community residents were able to vote on the final projects for the Fresno proposal, CEJA members have reported that the winning City of Los Angeles proposal incorporated very little community feedback and ideas. In adhering to the spirit and intent of AB 2722, the Guidelines should state that all TCC plans must include the voices of local community members and their priorities, to ensure that proposals are not based solely upon the Lead Applicant’s priorities and views.

**Recommendation #7: Differentiate between types of community engagement activities**

During past comment periods, CEJA has suggested creating distinctions between the types of community engagement that qualify as: informing, listening, opportunities to influence. While some of these recommendations made it into the Year 1 Guidelines, stakeholders have shared concerns that the suggested activities under these headers were still far from meaningful community engagement. In addition to requiring documentation, we recommend splitting the third row of “Table 4: Recommended Activities to Ensure Meaningful Community Engagement,” titled “Activities to Ensure Community Engagement During Implementation of TCC Plan” into two rows that distinguish between informing, listening, and opportunities to influence, similarly to how the first two rows distinguish activities for proposal development. These two rows could be split as follows:

<table>
<thead>
<tr>
<th>Category</th>
<th>Activities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Activities to Inform and Engage Community Stakeholders in Implementation of TCC Proposal</td>
<td>• Public workshops/meetings&lt;br&gt;• Door-to-door canvassing&lt;br&gt;• House meetings&lt;br&gt;• Established website and/or social media&lt;br&gt;• Sub-contract with community-based organizations to conduct outreach&lt;br&gt;• Allocate staff positions focused on community engagement&lt;br&gt;• Additional activities to inform and engage community stakeholders in implementation of the TCC Plan</td>
</tr>
<tr>
<td>Activities to Solicit Stakeholder Input to Influence Implementation of TCC Proposal</td>
<td>• Surveys&lt;br&gt;• Focus Groups&lt;br&gt;• Allocate staff positions focused on community engagement&lt;br&gt;• Advisory body or shared decision-making body&lt;br&gt;• Additional activities to provide community stakeholders an opportunity to influence implementation of the TCC Plan</td>
</tr>
</tbody>
</table>
We also recommend editing other sections of the Guidelines and corresponding scoring matrices to ensure that the point-based evaluation of proposals aligns with the intent to ensure a broader range of stakeholder voices, especially those community-based organizations partnering in implementation, are valued in the review of the application.

**Recommendation #8: Include stronger requirements for high level, in-depth, and long-term community engagement in all TCC funded plans.** CEJA deeply appreciates the requirement that all Applications include a clear Community Engagement Plan (CEP) within their proposal, including documentation to illustrate the history of resident engagement within a proposed Project Area. To strengthen the Guidelines’ requirements for community engagement, CEJA recommends the following additions to be included within this section of the Guidelines:

- **Require all plans to include a Participatory Budgeting (PB) planning process.** When executed well, PB processes achieve more high level community engagement. SB 1’s Sustainability Planning Grants may contain language that encourages the use of PB. Requiring or incentivizing a PB process can demonstrate both long-term community engagement and that the applicants aren’t simply informing the public on what's being implemented. We also recommend taking out low-level community engagement activities such as simply maintaining a website. If such activities continue to be options within the Guidelines, they should be strengthened to achieve more effective community engagement. For instance, since websites aren’t very accessible to people who do not speak fluent English, websites should be translated into locally-spoken languages such as Spanish or Mandarin using professional translators (etc.).

- **Require a minimum number of specific activities to be carried out and/or require that applicants quantify the number of community engagement activities that will be accomplished through their CEP.** Providing baseline requirements for implementing certain community engagement activities (e.g., all funded plans must complete X number of Activity A) would allow Applicants to demonstrate more high level community engagement. For instance, holding one or two public meetings or a few focus groups with ten people would be insufficient to demonstrating the high level of community engagement necessary to implement effective and community serving TCC plans.

- **Encourage Applicants to use a community nomination system to confirm community members that participate in the multistakeholder collaborative structure.**

- **Expand the cap on community engagement activities to 10% of total awarded funds.** While we appreciate the draft Guidelines’ case-by-case consideration of requests that go beyond the 5-8% cap on community engagement and outreach activities, we believe that a 10% funding cap on community engagement activities would encourage the development of stronger CEPs and the inclusion of more innovative and effective community-led projects within final proposals.

5. Additional Transformative Requirements, Projects and Strategies
**Recommendation #9:** Include the following list of policies, goals and priorities to ensure all awarded plans achieve the spirit and intent of AB 2722 and the Transformative Climate Communities Program:

- **Strengthen Displacement Avoidance Plans (DAPs) to include efforts designed and initiated by community-based organizations and residents.** In addition to requiring DAPs to consist of local government policies and programs that avoid the displacement of low-income households and small legacy businesses, we recommend allowance for community-led anti-displacement solutions to be included in DAPs and that would also be eligible for TCC funding, such as tenants rights education. In addition, we recommend subtracting points from proposals that take public housing off the market.

- **Prioritize more transformative projects and plans:** If all TCC-funded plans must maintain a strong focus on reducing greenhouse gas emissions, the Guidelines should differentiate between mitigation and reduction efforts. To be truly transformative, TCC plans should lead to shifts in behavior, not just activities that mitigate pollution (such as simply planting more trees).

- **Clarify the requirements for High Speed Rail Connectivity.** Requiring plans located in cities along the “Silicon Valley to Central Valley” High Speed Rail (HSR) line to produce certain improvements is challenging, as those plans may not necessarily provide direct benefits to highly impacted environmental justice communities. If the Guidelines must include requirements for cities with High Speed Rail stations, we recommend adding guidelines to demonstrate how proposals will produce clear and tangible benefits to disadvantaged communities. In addition, we recommend that the Guidelines clarify what it means to “include” multimodal connectivity between HSR stations and surrounding neighborhoods (for instance, would connectivity with existing bus lines and bike lanes qualify as multimodal connectivity, or would new infrastructure and services need to be developed or expanded?).

- **Ensure accurate scoring and evaluation of all submitted TCC grant proposals.** One challenge that came up during the scoring of the Year 1 Implementation Grant proposals was that certain reviewers were not fully knowledgeable of the subject areas that they were required to review. As a result, the scoring for certain parts of specific proposals may not have been completely accurate or sound. SGC should take the necessary steps to ensure that those responsible for scoring certain sections of the proposals maintain the skills and expertise needed to accurately review and score those sections.

6. **Technical Assistance**

CEJA recommends the following steps to ensure effective technical assistance (TA) service provision once TCC grants are awarded:

- SGC should verify that TA providers are highly knowledgeable and skilled, and maintain a proven track record for delivering the specific services they’ve been contracted to provide.
● TA providers should demonstrate a history successfully serving the particular regions and communities to which they’ve been assigned. The list of eligible TA providers should include nonprofits and universities that have direct experience working with disadvantaged communities.

● The list of available TA services could include consultation on how to do effective community outreach and how to incorporate meaningful community engagement throughout all implemented plans. This type of support should be overseen by community-based groups that maintain a high level of expertise on this topic, who can incorporate actual community perspectives into recommendations.

CEJA also wants to acknowledge that while we aim to set the bar high for all TCC-funded plans, we also understand that the TCC application process can be onerous. Applicants must maintain a high level of expertise and capacity in order to carry out all the grant’s requirements, including the lengthy application process. We hope that SGC can continue to work with all stakeholders to strike a balance between having a high-quality TCC program while also allowing historically under-resourced EJ communities to benefit from this program.

Thank you for considering our comments on the draft TCC Guidelines. Please feel free to reach out to CEJA with any additional questions or comments at any time.

Sincerely,

Tiffany Eng, Green Zones Program Manager
California Environmental Justice Alliance (CEJA)

Allen Hernandez, Executive Director and Michele Hasson, Policy Director
Center for Community Action and Environmental Justice (CCAEJ)

Grecia Elenes, Policy Advocate
Leadership Counsel for Justice and Accountability

Jessica Medina, Campaign Director
Strategic Concepts in Organizing and Policy Education (SCOPE)

Chelsea Tu, Senior Attorney
Center on Race, Poverty & the Environment (CRPE)
July 3, 2018

Randall Winston
Executive Director
California Strategic Growth Council
1400 Tenth Street Sacramento, CA 95814

Re: Comments on Transformative Climate Communities 2018 Draft Guidelines

Dear Mr. Winston:

Thank you once again for awarding the City of Los Angeles with $35 million for the Watts Rising Collaborative. This award will genuinely bring transformative change not only to the neighborhood of Watts but to Los Angeles. We are excited and proud of the Watts Rising Collaborative for their hard work and dedication to making this project a reality. Thank you for your partnership.

The City of LA commends and acknowledges the SGC for expanding upon the 2017 Guidelines and addressing critical issues that surfaced during the first year of the program. We appreciate these recommended modifications and are broadly supportive.

We would like to request that the SGC create a process to direct funding toward additional TCC projects in Los Angeles. A significant emphasis of SGC’s public process to develop the TCC program was about creating a pipeline of projects. With Los Angeles being home to over 210 of the 10% highest scoring CalEnviroScreen census tracts in California, it is vital that other neighborhoods who worked to be part of that pipeline, like Pacoima and South LA, have an authentic opportunity to implement their plans which also include multiple, coordinated GHG emissions reduction projects and provide economic, environmental, and health benefits.

In addition, we would like to offer the following comments on the draft guidelines:

1. Disbursement and Accounting of Funds:
   a. The disbursement process and schedule for all Projects should not be finalized during the Post-award Consultation phase. A suggested timeline should be available to potential applicants prior to submitting applications.
The timeline should be finalized during post-consultation. Doing so, will help applicants gauge their financial and administrative abilities to implement the project proposal.

Again, thank you for your and SGC’s hard work on these guidelines. The complementarity between the TCC guidelines and Mayor Garcetti’s Sustainable City pLAn reinforces the alignment between our respective visions. We look forward to continuing to work with the Council and our community partners as we near finalization of guidelines.

Sincerely,

Lauren Faber O’Connor
Chief Sustainability Officer
Office of Los Angeles Mayor Eric Garcetti
Below are my comments vis-a-vis the 2018-2019 TCC Guidelines. Should you have any questions, don’t hesitate to ask, and please confirm receipt.

I. B Program Summary
Currently, no funds are allocated for TCC for 2018-2019. The state should fund TCC Implementation grants for $100M for this next fiscal year 2018-2019. Else, the guidelines are moot for a year.

II. A(1) Eligible Applicants
Add ”Jurisdictions that have received Implementation funds, and who are currently implementing, aren’t eligible until Implementation is complete”. The state should wait to see the results of those investments before awarding additional TCC Implementation funds to those same proposers.

II. A(5) Project Area Requirements
Change first sentence of b. to “At least fifty-one percent (51%) of the geographic area of the proposed Project Area must overlap with Census Tracts within the top fifteen percent (15%) of disadvantaged communities, per CalEnviroScreen 3.0.16 ”

Appendix D. Readiness Requirement
We agree with inclusion of ”Environmental review of the projects is not required to be completed at the time of the application,” Please retain this clause.

David Jaber
djaber@innative.net
Greetings,

This wonderful program is right to emphasize place-based investments in disadvantaged communities.

We work in North Richmond, among the most economically challenged and pollution impacted neighborhoods in the Bay Area. We hope you’ll pay special attention to this community and provide outreach and resources that improve its chances of successful participation.

For more on North Richmond, click here: http://richmondconfidential.org/2011/08/03/part-7-north-richmonds-troubled-environmental-history/

Thank you,
Robert Rogers

Robert Rogers
District Coordinator
Office of County Supervisor John Gioia
11780 San Pablo Ave., Suite D
El Cerrito, CA, 94530
510.231.8688
www.cocobos.org/gioia<http://www.cocobos.org/gioia>
June 25, 2018

Saharnaz Mirzazad  
Strategic Growth Council  
1400 Tenth Street  
Sacramento, CA 95814

Dear Saharnaz Mirzazad,

On behalf of the City of San José’s Department of Transportation, we write to comment on the 2018-2019 Transformative Climate Communities (TCC) Program Draft Guidelines that were released on June 12, 2018.

Thank you for spearheading the implementation of the 2018-2019 Transformative Climate Communities Program. This program provides the potential for transformative transportation funding, and we share the state’s and Strategic Growth Council’s goals of empowering the communities most impacted by pollution, reducing greenhouse gas emissions, and reducing air pollution.

With that in mind, we have a few comments on the Transformative Climate Communities Guidelines:

2017 Changes to CalEnviroScreen

With the January 30, 2017 update to the California Communities Environmental Health Screening Tool the City of San José lost our only top 5% qualifying census tract for the Transformative Climate Communities Program.

AB 1550 Low-income Communities

Instead of strictly using top 5% CalEnviroScreen 3.0 census tracts the City of San José recommends the Strategic Growth Council define qualifying census tracts as those that are both SB 355 Disadvantaged Communities (CalEnviroScreen 3.0 top 25%) and AB 1550 Low-income Communities (below 80% of statewide median income or designated as low-income by HCD). This definition is currently used with other grant programs with the same mandates as the TCC Program.

Sincerely,

Jim Ortbal  
Director of Transportation
Dear Representatives of the Strategic Growth Council,

Here in Santa Rosa, CA, our community is recovering from the deadliest and most destructive wildfires in the history of our state. Many argue that these fires are a direct result of a prolonged drought caused by climate change. Fully 5% of our city's housing stock was decimated overnight, exacerbating an already bad housing shortage.

Although housing prices are high in Santa Rosa, there is a great deal of disparity across parts of town. Some parts of Santa Rosa are more financially "disadvantaged" in the traditional sense than others. But the city, collectively, is disadvantaged from the standpoint of having to rebuild large portions of town in an environment where there is a shortage of construction workers. The City of Santa Rosa is struggling to deal with lost property tax revenue as well. This situation should qualify as "disadvantaged" in a climate change sort of way.

I would ask that the definition of the term "disadvantaged" be expanded for the purposes of the TCC Project to include communities that have been dealt a crippling blow from climate change-related natural disasters. This could eventually include communities disadvantaged by severe drought where financial means to tackle the problem don't exist.

Thank you for considering my suggestion.

Very best regards.

Kevin Byrne
Prop. 39 Director North/East Bay Region
Santa Rosa Junior College
1501 Mendocino Avenue Santa Rosa, CA 95401
kbyrne@santarosa.edu
(707) 521-7940 desk
(707) 495-9396 mobile
June 29, 2018

Randall Winston  
Executive Director  
Strategic Growth Council  
1400 10th Street, #100  
Sacramento, CA 95814

Re: Transformative Climate Communities Draft Guidelines

Dear Director Winston,

The Trust for Public Land (TPL) was the lead applicant on the Green Together: NE Valley Transformative Climate Communities (TCC) proposal submitted in December 2018. TPL and its five co-applicants invested significant amounts of time and resources in completing the full application process. We encourage you to take those substantial investments into consideration and give last year’s applicants the option of resubmitting their 2017 application for the 2018 round of TCC grants.

Thank you for your consideration.

Sincerely,

Tori Kjer  
Los Angeles Program Director
June 29, 2018

Randall Winston
Executive Director
Strategic Growth Council
1400 Tenth Street
Sacramento, CA 95814

RE: Transformative Climate Communities Program Comments

Dear Mr. Winston:

Thank you for the opportunity to provide comments to the proposed Transformative Climate Communities (TCC) program. The City of Richmond applauds the intent of Assembly Bill (AB) 2722 and the Strategic Growth Council (SGC) to provide transformative, targeted investment in disadvantaged communities via the TCC program.

Comment #1 – Include recipients of previous TCC Planning Grant awards for implementation grants.

The City of Richmond, in partnership with the Trust for Public Land, was a recipient of a TCC Planning Grant (2016-17) to fund an initial schematic design for Phase 1 of the Richmond Wellness Trail. The Richmond Wellness Trail is a collaborative project that aims to: 1) develop complete streets and health-focused parks designed to inspire visitors to adopt healthy and wellness-oriented lifestyles; and 2) improve connectivity between the City’s multi-modal BART and Amtrak Station with the forthcoming Richmond Ferry Terminal. The City is working closely with community stakeholders to plan and design the Richmond Wellness Trail; however, the City lacks an identified funding source for implementation. Disadvantaged cities, like Richmond, must factor the opportunity costs of planning efforts that supplant staff resources invested in implementation projects, and working community members often balance multiple work schedules to attend community meetings. It’s critical that all City and community planning efforts, especially in disadvantaged communities, be conducted in a manner that leads to meaningful and tangible implementation outcomes for the community. SGC should expand TCC implementation grant eligibility to include recipients of previous TCC Planning Grant awards.

Comment #2 - Expand eligibility framework that is inclusive for the most disadvantaged communities in the San Francisco Bay region.

The SGC’s Initial 2017 TCC implementation communities appropriated two grant awards reserved for Los Angeles (Southern California) and Fresno (Central California), and a third competitive grant award for the City of Ontario (Southern California). Northern California was largely ineligible to compete in the 2016-17 implementation grant awards due to SGC’s interpretation of the “most” disadvantaged communities being limited to the top 5% census...
tracts in CalEnviroScreen 3.0. The City of Richmond has among the highest populations of the top 10% census tracts in the San Francisco Bay region. **The 2018 TCC implementation grant should include an eligibility framework that is inclusive for the most disadvantaged communities in the San Francisco Bay region.**

**Comment #3 -** Factor the margin of error in CalEnviroScreen 3.0 and expand eligibility to the top 10% census tracts.

The TCC program follows the guidelines set forth by Senate Bill (SB) 535 to identify disadvantaged communities based on geographic, socioeconomic, public health, and environmental hazard criteria. CalEnviroScreen 3.0 is identified as the primary assessment tool for allocating TCC funding. While it is unrealistic to expect any methodology to completely capture the nuances of each community in California, there are still improvements that would allow CalEnviroScreen 3.0 to more accurately measure environmental burdens, and ensure the equitable measurement that AB 2722 and SGC desires. Richmond believes that the CalEnviroScreen 3.0 tool, as currently designed, does not fully reflect all the health, safety, and economic burdens Richmond residents bear from hosting heavy industry, including the Chevron Refinery, the largest stationary source of greenhouse gas emissions in the State, the region’s transfer station, compost, and recycling facilities, an industrial port, coal shipment facilities, Chemtrade (formerly General Chemical), and a high concentration of interstates and industrial facilities. **The TCC 2018 eligibility guidelines should factor the margin of error in CalEnviroScreen 3.0 and expand eligibility to the top 10% census tracts.**

**Comment #4 -** Award funds to communities not only with significant environmental burdens, but to those that host Cap and Trade regulated facilities.

Richmond residents, a majority of whom are low-income and people of color, live directly adjacent to California’s largest oil refinery and two additional facilities regulated by AB 32. The Legislature directed that SB 535 and AB 1550, in addition to reducing greenhouse gas emissions, needs to provide a quarter of the proceeds from the Greenhouse Gas Reduction Fund (GGRF) to projects that provide a benefit to disadvantaged communities. The TCC should take this initiative a step further and award funds proportional to disadvantaged communities hosting Cap and Trade regulated facilities. The entire Bay Area region benefits from Richmond’s significant environmental burden, while local residents are disproportionately affected by a variety of health, safety, and economic disparities. Residents absorb the impacts of these facilities, as well as their negative ancillary effects that deter private sector investments, and deserve to be adequately represented with contributing funds. **The SGC should implement the TCC with a comprehensive equity framework; award funds to communities not only with significant environmental burdens, but to those that host Cap and Trade regulated facilities.**
Comment #5 - Require policy frameworks that advances equity and innovation in climate resiliency solutions.

The TCC's ability to facilitate strategic investments will be the most effective in communities with an established policy framework with public health and climate change initiatives. These communities will be most prepared to implement and maintain TCC grant-funded projects. The TCC Applicant and Project Area Requirements should be expanded to include that applicants demonstrate a policy framework that advances equity, and innovation in climate resiliency solutions.

Thank you for considering these comments on behalf of the City of Richmond.

Sincerely,

[Signature]

William A. Lindsay
City Manager
June 29, 2018

Strategic Growth Council  
ATTN: Saharnaz Mirzazad  
1400 Tenth Street  
Sacramento, CA 95814  

Re: Transformative Climate Communities Draft Program Guidelines [sent by email]  

Dear Saharnaz Mirzazad,  

On behalf of Sierra Business Council (SBC), a non-profit network of 4,000 business, local government and community partners working to foster vibrant, livable communities in the Sierra Nevada 22-county region, and the Sierra Institute, a non-profit working to promote sustainable social, environmental, and economic approaches to watershed and forest health in the Sierra Nevada region, we submit the following comments on the Draft Program Guidelines.

Sierra Business Council manages the Sierra Climate Adaptation and Mitigation Partnership (Sierra CAMP), a group of 32 non-profits, businesses and local governments working to promote sustainable climate adaptation and mitigation strategies throughout the Sierra region. Sierra CAMP works to build the capacity of its network to holistically and equitably address climate change, and to reduce barriers to action.

We appreciate the efforts of the Strategic Growth Council to comprehensively and strategically address statewide social equity and the needs of under-resourced communities. However, the current funding guidelines disproportionately preclude many rural low-income and under resourced communities, including many tribal communities and pollution-burdened communities, from applying due to the CalEnviroscreen and area requirements. To truly meet the social equity goals laid out by the Council, and to design a program that is truly statewide in impact, we suggest incorporation of one or more of the following 3 actions to address this issue:

1) **Broaden the definition of “disadvantaged communities” eligible for funding using other indicators in addition to CalEnviroscreen.**

   Sierra Nevada communities and other rural communities currently cannot apply to any part of the Transformative Climate Communities program and many of
the other Climate Investments programs due to broad adoption of CalEnviroscreen beyond the minimum legislative requirements. Since the beginning of these programs, for example, communities in the Sierra Nevada Region have received less than 3% of CCI grant funds every fiscal year\(^1\) – despite the region covering 25% of the state’s land, being home to 800,000 Californians and providing numerous benefits to the entire state, including water quality and water supply, timber, energy, outdoor access and recreation to millions of Californians from urban communities like Fresno and Sacramento, and carbon sequestration.

Without investment from the state, these benefits and these communities are at risk to catastrophic wildfire, drought, and diminished water quality and water supply – especially with a changing climate. Rural Sierra communities are the gateway to these critical natural resources, and the state relies heavily on the health and resilience of these communities to maintain these resources, and yet does not recognize the real burdens placed on these communities due to isolation, crumbling infrastructure, lack of broadband and other key modern resources, and capital deserts. Five of the six subregions of the region have MHI’s well below the average State MHI – ranging between $43,200 and $51,000.\(^2\) Many of these communities’ populations are declining. Between 1990 and 2011, the region lost over 9,000 jobs due to mill closures\(^3\) – and most towns, like the City of Loyalton, have never recovered and continue to decline in jobs and population – a major loss in human capital to the state, which needs to remove more than 129 million dead or dying trees from the region to maintain the ecosystem services, economic benefits and other benefits Sierra forests provide.\(^4\)

The indicators used by CalEnviroScreen 3.0 are disproportionately based on pollution hazards and other factors related to urban conditions, resulting in the complete absence of eligible DACs in the Sierra, the North Coast, and many inland rural areas – despite the real economic and social disadvantages faced in these areas. For example, woodsmoke and wildfire emissions are one of the greatest pollution hazards in the Sierra Nevada region – and yet this is not included as a metric in CalEnviroscreen’s measurements. While we applaud the current applicability of this tool in other areas of the state like the Central Valley, which allows many DACS to access much-needed funding, state agencies must recognize that this tool does not fully capture the burdens and needs faced by many other communities – like the many tribal and low income communities in the Sierra Nevada that need capacity building resources and funding to meet the state’s climate goals and build resilience to climate change.

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2. [www.sierranevada.ca.gov/our-region/sys_ind_docs/demographics_and_economy.pdf](http://www.sierranevada.ca.gov/our-region/sys_ind_docs/demographics_and_economy.pdf)
3. [www.arcgis.com/apps/Cascade/index.html?appid=2aa4e916e76943e2b5d84bd791be8f8e](http://www.arcgis.com/apps/Cascade/index.html?appid=2aa4e916e76943e2b5d84bd791be8f8e)
The Transformative Climate Communities Program needs to recognize the real burden of these communities and the real benefits that all rural communities provide to the state – these communities need transformative investment programs just as much as urban, low-income communities of color, and indeed often include low-income communities of color in proportions smaller than census tracts. **CalEnviroscreen should be used to allocate at least 25% of these funds, but not 100% of funds** – other indicators, such as the definition used by Proposition 84 (section 75005 of the Public Resources code) or the allocations described in AB 1550 (2016, Section 39713 of the Health and Safety Code), should be used to complement CalEnviroscreen for a portion of the funds. Under the Prop. 84 definition, “‘Disadvantaged community’ means a community with a median household income less than 80% of the statewide average and ‘Severely disadvantaged community’ means a community with a median household income less than 60% of the statewide average.”

For example, 10% or more of the funds could be allocated based on eligibility using this other definition – allowing the TCC program to meet its legislative directives while also more broadly and equitably addressing its intent to help under-resourced communities throughout the state.

2) **Allocate a rural set-aside for funds, similar to the Affordable Housing and Sustainable Communities program.**

California’s small and rural communities include some of the most economically disadvantaged communities in California and are crucial to meeting the state’s aspirational GHG reduction and adaptation goals; but without resources, the ability of these communities to survive, make change and meet statewide targets is compromised. The Affordable Housing and Sustainable Communities (AHSC) program has taken steps to address this issue by creating a separate Rural Innovation Project Area funding category. We recommend adding a specific rural set aside that ensures some investment is carried out in rural areas of the state.

3) **Remove or modify the requirement for a contiguous Project Area that is no larger than approximately five-square miles and is within the boundary of a single incorporated city.**

We suggest either creating a rural project category or otherwise modifying this requirement to be more flexible and accessible to rural and small communities. The majority of rural populations of the state do not live within incorporated areas, and five square miles is not a large enough area to capture the needs of rural communities. As written, this project area requirement would not allow investments in rural place-based solutions that span greater distances than urban communities, such as broadband connectivity, local transit and walkability.
projects, local food projects, etc. Many of the tribes in the Sierra Nevada region do not live in or near incorporated city centers.

For example, in the Tahoe-Truckee region, the community spans multiple jurisdictions (but only 1 incorporated jurisdiction) and the local transportation system covers more than 30 miles of rural mountain roads. This system is extremely outdated and badly in need of upgrades to improve services and ridership and to meet the needs of a tourism-based, mountain economy, and yet, a system-wide sustainable transit project that might otherwise connect with local affordable housing, walkability/bikability, local food and park access projects would be ineligible for a Transformative Climate Communities grant. Such a project also has the potential to substantially reduce greenhouse gas emissions and other local impacts related to winter and summer recreational visits from outside the region. This situation is similar to many rural and mountainous communities.

We thank you for this opportunity to provide suggestions and look forward to continued engagement with the Strategic Growth Council and staff on this program. For any questions you may have regarding these suggestions, please reach out to the Sierra Climate Adaptation and Mitigation Partnership Program Manager, Nikki Caravelli at ncaravelli@sierrabusiness.org or 530-562-4943.

Sincerely,

Steve Frisch
President, Sierra Business Council

Jonathan Kusel
Executive Director, Sierra Institute
Ms. Saharnaz Mirzazad  
Strategic Growth Council  
1400 Tenth Street  
Sacramento, CA 95814  

RE: Transformative Climate Communities Program FY 2018-2019 Draft Guidelines  

Dear Ms. Mirzazad:  

MTC appreciates the opportunity to comment on the Transformative Climate Communities Program FY 2018-19 Draft Guidelines. As the program enters its second round, we submit the following comments in the spirit of expanding or retaining chances to compete for these funds:  

- Consider expanding Implementation Grant eligibility beyond the top 5% of CalEnviroScreen Disadvantaged Communities, for example, to include prior recipients of TCC Planning Grants, or the top 25% of DACs.  
- Consider retaining the top 25% of DACs eligibility for Planning Grants, rather than restricting to the top 5%, in order to help these highly disadvantaged communities compete for future TCC Implementation Grants and other Greenhouse Gas Reduction Fund programs.  

We are concerned that under the proposed guidelines, the Bay Area is limited to one potential project site for both implementation and planning grants. Recipients of previous TCC planning grants would not be able to further compete, nor would the many other disadvantaged communities in the region.  

Thank you for your consideration. We look forward to our continued work with the Strategic Growth Council on this and other programs to implement critical California Climate Investments funds.  

Sincerely,  

Alix A. Bockelman  
Deputy Executive Director, Policy  

June 29, 2018
Hello SGC–

5 requested amendments:

- Reimburse non-profit project lead organization 10% of the project grant to the non-profit org for indirect expenses when serving a DAC
- Reimburse the host city for 5% of the total TCC project for program administration and indirect expenses.
- For Tree Planting Projects, reimburse for project planning expenses to include landscape architect and certified arborist services, enrollment of property owners in the tree planting project, training of residents in tree planting and tree care, and community meetings to explain the program.
- Fund tree care for 5 years during the establishment period, to include updating the drip rings in year 5, with preference to professionally supervised tree care programs that employ residents of the “Place”
- Require the host city government who leads the project to serve as the fiscal agent and make reimbursements within 30 days of the monthly submission of invoices; provided that project leads that employ licensed tree and landscape contractors can be reimbursed before payment to the contractor; in the alternative, SGC will make an advance to the host city to permit advances to non-profit organizations of up to 25% of the project cost.
- Allocate 20% of the TCC funds to career development opportunities for residents to include certifications issued by a community college, apprenticeship programs, and placement services.

Thank you for your consideration, Lee

Lee Ayres
San Joaquin Green™
Let’s transform the San Joaquin Valley
with trees, greenways and beautiful landscapes . . .
one school, park, business or home at a time
Tree Fresno  www.treefresno.org
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(O) 559-221-5556  (M) 559-285-3906  lee@treefresno.org
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| Applicants must meet at least three of the eight strategies listed in order to qualify for this Grant Program.  
Page 22 Item 4 and Item 6 | Reduce the strategy requirement to two of the eight strategies. Alternatively, the strategy below could be revised to broaden the number and type of projects that could meet the strategy. |
| Land Conservation and Restoration. Permanently protect agricultural land and open space with conservation easements, implement sustainable soil and irrigation management practices, increase permeable surfaces, restore urban streams, and restore wetlands and habitat.  
Page 22 Item 7 | Land Conservation and Restoration. Permanently protect agricultural land and open space with conservation easements, implement sustainable soil and irrigation management practices, increase permeable surfaces, restore urban streams, and restore wetlands and habitat, or improve water quality discharged to these natural resources.” |
| For implementation projects, please clarify if project areas can also be in County unincorporated areas or if only projects in Cities are eligible.  
Section 5-a. on Page 8 seems to imply only projects in incorporated Cities are eligible.  
Page 8 Item 5a | Consistency with Existing Local Land Use and Transportation Plans, if the applicant is the Department of Public Works can this requirement be met by making a statement in the application or is a separate letter needed? |
| Can each jurisdiction only submit one application for all proposed projects or can jurisdictions submit multiple applications for individual projects. In Los Angeles County many Departments work independently on implementation and planning projects and may submit independent applications.  
Page 8 Item 6 | Can each jurisdiction only submit one application for all proposed projects or can jurisdictions submit multiple applications for individual projects. In Los Angeles County many Departments work independently on implementation and planning projects and may submit independent applications. |
| Please clarify if individual projects will be eligible for grant funding under this program or if only a large scale community plans with multiple project components will be eligible for funding?  
Page 8 Item 6 | Please clarify if individual projects will be eligible for grant funding under this program or if only a large scale community plans with multiple project components will be eligible for funding?  
Some funding should be made available for individual projects that are not part of a larger community plan but provide benefits consistent with the goals of the program, for example a standalone cool pavement resurfacing project in a neighborhood or a County wide tree inventory with a small standalone tree planting project in a community. |
| Table D-3.  
Page D-11 Table D-3 | Please clarify if cool pavements have to be part of residential housing project or if a standalone road resurfacing project by a jurisdiction proposing to use cool pavements would be eligible.  
Requirements like work force training plans and displacement avoidance plans would be very burdensome to individual projects. |
| Applicants must define a contiguous Planning Area that is no larger than approximately five-square miles and is within the boundary of a single incorporated city.  
Page 39 Item 3 | Five-square miles is very restrictive and may preclude the County from applying for this grant opportunity.  
It is suggested that planning areas are defined by the local jurisdictions General Plan.  
This requirement does not support the use of this grant opportunity within the unincorporated areas of the County. |