

Proposed Rulemaking for the Transformative Climate Communities Program

PUBLIC COMMENT SUMMARY AND RESPONSE

Public Comment Period:
September 23, 2016 through November 7, 2016

INTRODUCTION

The Strategic Growth Council (Council) proposes to adopt the following regulation allocating funding of Transformative Climate Communities Program (Program) funds pursuant to Public Resources Code sections 75240 *et seq.*

Transformative Climate Community Program funds shall be allocated in the cities of Los Angeles and Fresno and a third location. A minimum of half of the funds shall be allocated in the City of Fresno. A minimum of one fourth of the funds shall be allocated in the City of Angeles.

Note: Authority cited: Section 75243, Public Resources Code. Reference: Sections 75240-75243, Public Resources Code

This proposed regulation is the first phase of implementation of the Program created in Public Resources Code section 75240. The Legislature allocated \$140,000,000 for the Program. AB 2722 left discretion with the Council on the precise allocation of the funds. Specifically, this proposed regulation specifies that Program funds shall be allocated in the City of Los Angeles, the City of Fresno and a third location. It specifies that a minimum of fifty percent of the Program funds shall be allocated within the City of Fresno and a minimum of twenty-five percent within the City of Los Angeles. Importantly, this action only specifies geographic locations where Program funds may be invested. All Program grants will be awarded pursuant to a competitive process according to guidelines and selection criteria determined in a separate, future process.

Pursuant to Government Code section 11346.6, the Council gave public notice on September 23, 2016 and provided opportunity to comment on the provisions of this proposed regulation until November 7, 2016. The Council received input from 66 commenters in this time period. Each commenter received a number and abbreviation for identification purposes.

COMMENTERS [WRITTEN]

<u>Number</u>	<u>Name</u>	<u>Abbreviation</u>
0001	Department of Regional Planning, Los Angeles County	LA County

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0002	Kern Council of Governments	Kern COG
0003	Office of Assemblymember Dr. Joaquin Arambula, Thirty-First District of California	Asm. Arambula
0004	The Trust for Public Land	TPL
0005	Metropolitan Transportation Commission (Transportation Planning, Financing and Coordinating Agency for the nine-county San Francisco Bay Area)	MTC
0006	Housing Authority of the City of Los Angeles	HACLA
0007	Climate Resolve	Climate Resolve
0008	Plug In America	Plug in America
0009	Sal Moretti	Mr. Moretti
0010	David Jaber	Mr. Jaber
0011	Alameda County Transportation Commission	Alameda CTC
0012	Grid Alternatives	Grid Alt.
0013	Southern California Association of Governments	SCAG
0014	San Mateo Transit District	San Mateo TD
0015	Natural Resources Defense Council	NRDC
0016	Leadership Counsel for Justice & Accountability	LCJA
0017	California Rural Legal Assistance Foundation	CRLAF
0018	City of Los Angeles	CityLA
0019	City of Oakland	CityOakland
0020	City of Richmond	CityRichmond
0021	Sierra Business Council	SBC
0022	Southern California Gas Company	SoCalGas
0023	California Environmental Justice Alliance	CEJA
0024	Tree People	TreePeople
0025	Center for Sustainable Energy	CSE
0026	REV (Company that Provides Sustainability Education and	REV

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	Practices)	
0027	Sustainability Department of the Land Use and Environmental Planning Division, Southern California Association of Governments	SCAG
0028	Livermore Area Recreation and Park District	Livermore
0029	Los Angeles Economic Development Commission	LAEDC
0030	San Bernardino County	SanBernCounty
0031	OmniTrans (Public Transportation Agency in San Bernardino County)	OmniTrans
0032	Southcoast Air Quality Management District	SCAQMD
0033	Center for Community Action and Environmental Justice	CCA EJ
0034	City of Ontario	CityOntario
0035	Gateway Cities Council of Governments	GatewayCOG
0036	Sonoma County Transportation Authority/Regional Climate Protection Authority	SCTA/RCPA

COMMENTERS [CITY OF FRESNO WORKSHOP]

Public Hearing Details:
 Monday, November 7, 2016
 9:00 am- 12:00 pm
 Fresno City Council Chambers
 City Hall, 2nd Floor
 2600 Fresno Street
 Fresno, CA 93721

The Council provided the opportunity to comment on the express terms of the proposed regulation as part of a public hearing. Spanish translation services were provided for attendees.

Number	Name	Abbreviation
0037	Penny Newman, Center for Community Action and	CCA EJ

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	Environmental Justice	
0038	Veronica Alvarado, Warehouse Worker Resource Center	WWRC
0039	Michele Hasson, Center for Community Action and Environmental Justice	CCA EJ
0040	Matt Abularch-Macias, California League of Conservation Voters	CLCV
0041	Aaron Blair, Downtown Fresno Partnership	DFP
0042	Brian Angus, Fresno Economic Opportunities Commission	Fresno EOC
0043	Paul Hernandez, Center for Sustainable Energy	Mr. Hernandez
0044	Assemblymember Dr. Joaquin Arambula	Asm. Arambula
0045	Jessica Medina, Strategic Concepts in Organizing and Policy Education	SCOPELA
0046	Magdalena Barrios, Fresno resident	Ms. Barrios
0047	Tiffany Eng, California Environmental Justice Alliance	CEJA
0048	Grecia Elenes, Leadership Counsel for Justice & Accountability	LCJA
0049	Keith Bergthold, Fresno Metro Ministry	FMM
0050	Isabel Vargas, Fresno resident	Ms. Vargas
0051	Margarita Villasenor, Fresno resident	Ms. Villasenor
0052	Mayor Ashley Swearengin, City of Fresno	CityFresno
0053	Amparo Cid, San Joaquin Valley Health Fund	SJVHF
0054	Councilmember Esmeralda Soria, City of Fresno	CityFresno

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0055	Venise Curry, Communities for New California Education Fund	CNCEF
0056	Yolanda Randles, West Fresno Family Resource Center	WFresnoFRC
0057	Josh Candelaria, County of San Bernardino	SanBernCounty
0058	Lilia Becerrill, Fresno resident	Ms. Becerrill
0059	Lucio Avila, Centro La Familia Advocacy Services	Centro
0060	Sandra Celedon, Fresno Building Healthy Communities	FresnoBHC
0061	Maria Del Carmen Padron, Fresno Resident	Ms. Padron
0062	Francisco Mendez, Fresno Resident	Mr. Mendez
0063	Ashley Werner, Leadership Counsel for Justice & Accountability	LCJA
0064	Jeanie Ward-Waller, California Bicycle Coalition	CBC
0065	Councilmember Lee Brand, City of Fresno (Mayor-Elect, City of Fresno)	CityFresno
0066	Mary Curry, Concerned Citizens of West Fresno	CCWF

COMMENT SUMMARIES AND RESPONSES

Comments are categorized into three broad positions in relation to the express terms of the proposed regulation: (A) comments supporting the proposal, (B) comments suggesting revisions to the provision, and (C) comments that are outside the scope of this rulemaking. Within each of these broad positions, comments are further sorted into themes.

Commenters provided many distinct comments within their submissions. To indicate where each comment originated, numeric codes at the beginning of each comment

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summary correspond to the written comment submission or transcript of the public hearing.

Many of the comments raised similar issues. Categorical responses are therefore provided to similar comments. Those responses specify which comments are addressed. In cases where a more distinct response is required, the response immediately follows the unique comment.

A. COMMENTS SUPPORTING THE PROPOSAL

KEEP INVESTMENTS CONCENTRATED	
1	(Kern COG; 0002-1) One of the comments [SGC] received during prior public meetings on related SGC programs was the limitation that is created on disadvantaged communities when funding is piecemealed in small amounts and other funds are matched. This new Transformative Climate Communities (TCC) Program addresses that issue by concentrating funding in a specific disadvantaged community.
2	(Kern COG; 0002-2) The TCC Program should provide the remaining \$35 million funding competitively to one community to maximize the transformative effect. This will have synergistic benefits for the disadvantaged community and avoid piecemeal development.
3	(TPL; 0004-4) The opportunity for authentic community participation is greatly enhanced by SGC's selection of three locations in which to invest TCC funds.
ADOPT THE EXPRESS TERMS OF THE PROPOSED REGULATION	
4	(CSE; 0025-1), (Mr. Hernandez; 0043-1), (SCOPELA; 0045-1) Comment supports the current funding allocation and selected localities as proposed in the regulation. In addition, the comment agrees with the selection of Fresno and Los Angeles, as these two cities experience high poverty levels and substantially higher pollution burdens than other parts of the state.

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5	<p>(Mr. Jaber; 0010-1)</p> <p>The proposal’s rationale for some money to go to Fresno and LA is solid.</p>
6	<p>(REV; 0026-1)</p> <p>Since we know at the global level we are not achieving the GHG reductions necessary to avoid the worst of global warming, time is of the essence to develop new tools and tactics to scale GHG reducing change quickly. As such, we applaud California's leadership in creating the TCC program and stand ready to assist in its success and expansion.</p>
7	<p>(CityLA; 0018-1), (TreePeople; 0024-1), (Climate Resolve; 0007-1)</p> <p>Thank you for the proposal to allocate a minimum of 25% of the total funds from the Transformative Climate Communities (TCC) program to the City of Los Angeles. As the Council’s assessment concludes, there is both critical need and great opportunity in Los Angeles. The TCC program has the ability to become a model for driving investment in transformative change in disadvantaged communities across the state.</p>
8	<p>(CRLAF; 0017-1), (LCJA; 0048-1), (Ms. Barrios; 0049-1)</p> <p>We support the targeted investment in the City of Fresno to the most impacted by poverty and pollution in California. Thanks to these investments, Fresno will be positioned to be a model for lifting up California’s most vulnerable communities in need.</p>
9	<p>(NRDC; 0015-1)</p> <p>We support the Council’s approach to prioritizing Los Angeles as a geographic area eligible for TCC dollars with at minimum twenty-five percent of the program’s funding.</p> <p>Los Angeles is a municipality ready to make enormous strides in climate-related policy change, but it is in need of greater resources to bring integrated climate programs to the parts of the city that are in most need of the benefits. With a much more sizable investment, Los Angeles is ready to do even more.</p>
10	<p>(SBC; 0021-1)</p>

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	<p>We appreciate the Transformative Climate Communities Program (TCCP) rationale for the proposed 75% allocation to the state’s top two urban areas with the largest proportion of residents experiencing the highest pollution burden (Fresno and Los Angeles), as described in the Initial Statement of Reasons. This allocation clearly addresses the stated goals of catalyzing transformational change and giving priority to areas that are the most disadvantaged.</p>
11	<p>(SCAG; 0013-1)</p> <p>Comment supports the proposed allocation of 25% of TCC resources within the City of Los Angeles and 50% within the City of Fresno to advance local, regional and state objectives.</p>
12	<p>(LCJA; 0016-1)</p> <p>We support of the proposed \$70 million allocation to the City of Fresno.</p>
13	<p>(LAEDC; 0029-1)</p> <p>We agree that the bulk of funding should be directed to the areas that are unfortunate enough to have both an extremely high burden for air quality and a higher than [average] unemployment (when compared to the national average) —San Joaquin Valley and the Los Angeles region are the clear “leaders” in this combined category.</p>
14	<p>(Asm. Arambula; 0003-1), (Asm. Arambula; 0044-2)</p> <p>The proposed rulemaking is another positive step toward ensuring our most disadvantaged communities have the resources and support they need to meet the challenge of reducing greenhouse gas emissions...this will help Fresno create a thriving downtown and will revitalize the local economy.</p>
15	<p>(TPL; 0004-1)</p> <p>While disadvantaged communities that would benefit greatly from the TCC program are located across the state, we understand the rationale for the selection of Los Angeles and Fresno (and a third location to be determined) as the focus of the first year of the program.</p>
16	<p>(DFP; 0041-1), (HACLA; 0006-1)</p>

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	Support for the approval of the proposed percentage allocation as presented by the Council.
17	<p>(Fresno EOC; 0042-1)</p> <p>Support for the proposal.</p> <p>Fresno is big enough, so that if you make a difference it means a difference. If you can change Fresno, you can change any community. We're also small enough so it's manageable. You have an opportunity here to come into Fresno and make the kind of change that is noticeable, documentable, and people around the world are going to see it. And they're going to say, "We want to make our city like Fresno," in the future. And they will then follow with us, and the big cities will follow us too.</p>
18	<p>(Asm. Arambula; 0044-1)</p> <p>When working on this bill, I argued that we needed to come back home if we are going to invest in dollars (referring to the City of Fresno). We need to fix the areas that are most disadvantaged.</p>
19	<p>(CityFresno; 0052-1), (CNCEF; 0055-1), (WFresnoFRC; 0056-1), (Ms. Becerrill; 0058-1), (Centro; 0059-1), (Asm. Arambula; 0003)</p> <p>I'm here on behalf of the residents of the City of Fresno to say, we completely affirm and support the draft Rulemaking that would dedicate 50 percent of these dollars to the City of Fresno.</p>
20	<p>(CityFresno; 0054-1)</p> <p>I'm in strong support of setting aside 50 percent for the City of Fresno. I think not only as a Council Member, but as someone that was an advocate and has been a strong advocate always for the Valley and particularly now for the City of Fresno, really seeing these types of investments for the first time is very, very exciting. I think for a long time the Central Valley, and in particular the fifth largest city, had been overlooked. So I want to thank you guys for those investments.</p>
SUPPORT FOR THE PROPOSED PLANNING GRANTS	
21	<p>(CEJA; 0023-7)</p>

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	The proposed planning grants will be critical to support the planning needed to move towards a full TCC implementation grant.
	<p><u>Response to comments 1-21:</u> Accepted; no changes required.</p> <p>The Council appreciates comments supporting the provisions of the proposed rulemaking.</p> <p>Notably, there will be a separate, future process regarding both the third geographic location to receive priority and the selection criteria in the Program guidelines.</p>

B. COMMENTS SUPPORTING REVISIONS TO THE PROPOSAL

	USE A DIFFERENT METHODOLOGY/DEFINITION TO IDENTIFY/PRIORITIZE DISADVANTAGED COMMUNITIES FOR PROGRAM ELIGIBILITY.
22	<p>(LA County; 0001-2)</p> <p>Use a different methodology to determine the allocation of program funds for specific geographic locations. The UCLA Luskin Center has estimated that 50% of Californians who live in a disadvantaged community are residents of Los Angeles County, which is comprised of 88 cities and unincorporated areas. The proposed approach does not acknowledge that the most disadvantaged communities are located throughout Los Angeles County in many cities and unincorporated areas.</p>
	<p><u>Response to Comment 22</u></p> <p>The Council rejects the suggestion to make program funds available to disadvantaged communities throughout Los Angeles County. As explained in greater detail in the Initial Statement of Reasons, the purpose of the Program is to target funds in a limited number of the most disadvantaged communities so that the Program investments will have a transformative effect. Spreading investments across a broader and more dispersed geography, though likely beneficial to those communities receiving funding, would be less likely to achieve that transformative objective. For that reason, the Council chose to limit Program investments to just three jurisdictions.</p> <p>Note, however, that even if not eligible for funding in this Program,</p>

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	<p>disadvantaged communities in the top 25% may be eligible to receive funding from other Cap and Trade programs, including the Affordable Housing and Sustainable Communities Program.</p>
<p>23</p>	<p>(CityOakland; 0019-8)</p> <p>I urge you to withdraw your proposal to restrict [Program] funds to census tracts scoring in the top 5 percent of CalEnviroScreen (CES).</p> <p>This decision could eliminate all Bay Area census tracts from TCCP funding, which is neither fair nor prudent policy.</p> <p>CES 3.0 shows dozens of Oakland census tracts score in top 90th percentile of exposure to diesel particulate matter, toxic clean-up sites, ground water threats, hazardous waste disposal, impacted water bodies, asthma rates, low birth weights, linguistic isolation, poverty, unemployment, and rent-adjusted income. However, using the CES 3.0 scores, none of Oakland census tracts rank in the 95th percentile of Disadvantaged Communities (DACs) and only 14 are even ranked in the top 75th percentile, a decline of 60% from CES 2.0.</p> <p>Based on these dramatic differences, we do not believe that CES 3.0 accurately reflects the environmental and socio-economic strain experienced by our residents. Your decision abandons the families we need to serve in Oakland’s numerous tracts ranked in the top 75th percent – people who are exposed to higher levels of diesel particulate matter, live near toxic and hazardous waste, experience higher rates of poverty and housing burden, and whose children suffer higher rates of asthma and low birth weights.</p>
	<p><u>Response to Comment 23</u></p> <p>Comment 24 raises two concerns. First, it suggests that focusing on the top 5% is too limited. The comment notes that there are many disadvantaged communities in Oakland within the top 25%, but none in the top 5%, and therefore that overburdened communities are left out by the proposal’s limited focus. The Council acknowledges that many disadvantaged communities will not be eligible to receive Program funding. As explained in greater detail in Response to Comment 23, above, the proposal deliberately focuses on the top 5% so that Program funds will more likely have a transformative effect.</p> <p>Second, the comment suggests that the latest version of CalEnviroScreen</p>

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	<p>does not accurately reflect the burden experienced by residents in the City of Oakland. This comment addresses the methodology for developing CalEnviroScreen and not the specific proposal in this rulemaking. Therefore, it falls outside of the scope of this rulemaking. To the extent that the comment suggests that SGC should not use CalEnviroScreen to identify disadvantaged communities, note that the statute creating the TCC Program defines disadvantaged communities to mean those identified using CalEnviroScreen.</p> <p>Therefore, the Council declines to change the proposal.</p>
<p>24</p>	<p>(San Mateo TD; 0014-4)</p> <p>We urge you to withdraw the proposal to restrict TCCP funds to census tracts scoring in the top 5 percent of CalEnviroScreen. This criteria was not included AB 2722 and would eliminate all but one Bay Area census tract from qualifying, or none if the California Environmental Protection Agency adopts the proposed Version 3.0 update to CalEnviroScreen. This is not an acceptable approach to establishing guidelines for a statewide competitive program.</p>
	<p><u>Response to Comment 24</u></p> <p>This comment suggests that the Program should not focus on the top 5% because AB 2722 did not include that criterion.</p> <p>AB 2722 set forth some broad criteria to guide Program development and implementation, but left the Council with discretion to design specific Program details, including eligibility. As explained in more detail in Response to Comment 23, above, the proposal focuses on three locations with communities in the top 5% because such targeted investments are most likely to be transformative.</p> <p>For this reason, the Council declines to revise the proposal as suggested.</p>
<p>25</p>	<p>(MTC; 0005-4)</p> <p>We believe the program eligibility should not be restricted as is currently proposed. To the extent that SGC wants to focus on the "most disadvantaged communities," we recommend targeting funds on the basis of socioeconomic factors or specific pollution-related variables with a strong relationship to greenhouse gas emissions, rather than the CES score.</p>

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	<p><u>Response to Comment 25</u></p> <p>This comment suggests that the Council should target funds based on factors other than CalEnviroScreen score. AB 2722 requires that Program funds be invested in disadvantaged communities, “as described in Section 39711 of the Health and Safety Code.” CalEnviroScreen is the basis that CalEPA used to identify disadvantaged communities pursuant to the Health and Safety Code. Therefore, the Council declines to target funds on other bases as described in the comment.</p>
26	<p>(CityRichmond; 0020-2)</p> <p>It would be fair and appropriate for SGC to ensure that CalEnviroScreen 3.0 scoring is updated to incorporated comments by the City of Richmond and other communities prior to evaluating TCC grant proposals. While it is unrealistic to expect any methodology to completely capture the nuisances of each community in California, there are still basic changes that need to be made to CalEnviroScreen 3.0 to more accurately measure environmental burdens, and ensure the equitable measurement that AB 2722 and SGC desires. Richmond's comments on the draft CalEnviroScreen 3.0 indicate that the draft tool, as currently designed, does not accurately reflect the health, safety, and economic burdens Richmond residents bear from hosting multiple stationary sources, including solid waste facilities, a refinery, and recycling facilities, since such facilities are omitted or not adequately considered.</p>
	<p>Response to Comment 26</p> <p>The Council declines to revise the proposal on the basis of this comment. See Response to Comment 24 for additional detail.</p>
27	<p>(Kern COG; 0002-4)</p> <p>In addition to the CalEnviroScreen (CES) Tool for identifying Disadvantaged Communities, the method for award of the remaining \$35 million should consider use of the Robert Wood Johnson (RWJ) Foundation County Health Rankings.</p>
	<p><u>Response to Comment 27</u></p>

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	<p>The Council recognizes an implied comment, here. Comment 28 includes support for the proposed allocation of funds. No revisions are needed to the proposed regulation from this implied comment.</p>
28	<p>(SBC; 0021-3)</p> <p>The current methodology for identifying disadvantaged communities, as called for under HSC §39711, does not include forested communities. We have made recommendations for other methodologies that we believe meet the geographic, socioeconomic, public health and environmental hazard criteria as required by SB 535 but that are more appropriate for identifying relative disadvantage in rural regions (please see attached <i>Disadvantaged Communities in the Sierra Nevada Region</i> white paper, dated October 2016).</p>
	<p><u>Response to Comment 28</u></p> <p>The Council declines to revise the proposal in response to this comment. See Response to Comment 26 for additional detail.</p>
29	<p>(SBC; 0021-4)</p> <p>The Affordable Housing and Sustainable Communities (AHSC) program has taken steps to address [ineligibility of funding for forested areas] by creating a separate Rural Innovation Project Area funding category. We urge the Council to take a similar approach within the Transformative Climate Communities Program, in order to better reflect the state’s geographic, economic, and resource diversity.</p>
30	<p>(MTC; 0005-2), (Alameda CTC; 0011-4)</p> <p>We are concerned about the rationale provided for this approach, namely that the cities of Fresno and Los Angeles have the highest concentration of census tracts scoring in the top 5 percent of CalEnviroScreen (CES). AB 2722 allows SGC to "give priority to plans and projects that cover areas that have a high proportion of census tracts identified as disadvantaged and that focus on communities that are most disadvantaged." However, use of a "top 5 percent CES scores" is not required by statute and does a poor job of identifying the state's most disadvantaged communities. Consider that 29 Bay Area census tracts scoring in the top 5 percent statewide with respect to socio-economic disadvantage (what CES terms "population characteristics") do not rank in the top 5% of the CES score based on the current version of CES.</p>

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	<p>Based on the proposed Version 3 update to CES, use of a top 5 percent CES threshold for defining eligible TCCP areas would eliminate any project within the nine county San Francisco Bay Area from eligibility. Under the current Version 2 of CES, just one Bay Area census tract located in Oakland would qualify. This is unacceptable for a new statewide competitive grant program to fund "neighborhood-level transformative climate community plans" that included no such restrictions when voted on by the Legislature.</p>
	<p><u>Response to Comment 30</u></p> <p>The Council declines to revise the proposal in response to this comment. See Response to Comment 24 for additional detail.</p>
31	<p>(SCTA/RCPA; 0036-4)</p> <p>We urge that you withdraw the proposal to restrict TCCP funds to census tracts scoring in the top 5 percent of CalEnviro Screen. This criteria was not included in AB 2722 and would eliminate all but one Bay Area census tract and all Sonoma County disadvantaged communities from qualifying for funding from this program. Using the census tract level to discern disadvantaged areas is too broad a brush. Rural census tracts are very large and often very socio-economically diverse. SCTA has identified 137 disadvantaged communities locally by examining more geographically detailed socio-economic data.</p>
	<p><u>Response to Comment 31</u></p> <p>The Council declines to revise the proposal in response to this comment. See Response to Comment 24 for additional detail.</p>
32	<p>(CityRichmond; 0020-3)</p> <p>Award funds to communities not only with significant environmental burdens, but to those that host Cap and Trade regulated facilities.</p>
33	<p>(GatewayCOG; 0035-1)</p> <p>Based on our long history of successful planning, and the vision articulated through our Strategic Transportation Plan, the Gateway Cities are prepared to work on that transformational scale for the benefit of our deserving communities. <u>The Gateway Cities as a whole would rank between Los Angeles and Fresno on these same measures.</u> Three-quarters of our region's population lives in census tracts that are considered</p>

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	disadvantaged (top 25% of scores) according to the state's model.
	<p><u>Response to Comments 22-33:</u> Rejected.</p> <p>AB 2722 (Chapter 371, Statutes of 2016) provides that the Council’s Program “fund the development and implementation of neighborhood-level transformative climate community plans that include multiple, coordinated greenhouse gas emissions reductions projects that provide local economic, environmental, and health benefits to disadvantaged communities as described in Section 39711 of the Health and Safety Code.”</p> <p>The California Environmental Protection Agency (CalEPA) developed the California Communities Environmental Health Screening Tool (CalEnviroScreen), a science-based tool for evaluating multiple pollutants and population stressors throughout the state, partly in response to SB 535 (Chapter 830, Statutes of 2012). SB 535 added Section 39711 of the Health and Safety Code (Section 39711), requiring CalEPA to “identify disadvantaged communities based on geographic, socioeconomic, public health and environmental hazard criteria.” CalEnviroScreen uses these criteria to rank census tracts statewide (the more disadvantaged the community is, the higher the ranking.)</p> <p>Because AB 2722 incorporates Section 39711, the Council relies on the state agency explicitly tasked with the responsibility for identifying disadvantaged communities (CalEPA) and the state agency’s tool (CalEnviroScreen). The Council does not have authority to change CalEnviroScreen or defining “disadvantaged communities” differently than Section 39711.</p> <p>Neither AB 2722 nor Section 39711 requires the Program to use a specific version of CalEnviroScreen or an exact threshold percentage for identifying the most disadvantaged communities in the state. The Council’s choice to designate eligibility of Program funds in the cities of Los Angeles and Fresno is based on a list of communities with the highest proportion of census tracts in the 5 percent most disadvantaged and the highest total population within 5 percent most disadvantaged census tracts via CalEnviroScreen. By choosing the 5 percent most disadvantaged, Council is exercising its discretion, provided by AB 2722, to “give priority to plans and projects that cover areas that have a high proportion of census tracts identified as disadvantaged communities and that focus on communities that are most disadvantaged.” (Public Resources Code § 75241(b)(2).)</p> <p>For the reasons stated above, we believe the express terms of this proposed</p>

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	<p>regulation are consistent with AB 2722 and the Council declines to revise it as suggested in the comments.</p>
<p align="center">RECONSIDER THE PROPOSED PERCENTAGE ALLOCATIONS OF PROGRAM FUNDS</p>	
<p>34</p>	<p>(TreePeople; 0024-3)</p> <p>Favoring Fresno to such a large (and disproportionate) degree will certainly reduce the Program’s potential impact in Los Angeles, particularly as many opportunities for private development exist in Los Angeles and so private investment may be less reactive to Program funds. We understand that the Council does not yet have sufficient data to determine what approach offers the greatest potential for success. However, we believe that the Program’s potential to stimulate private investment to make our communities more climate-resilient is significant, urgent and likely to be better realized in Los Angeles.</p>
<p>35</p>	<p>(TreePeople; 0024-2)</p> <p>We urge the Council to maintain at least 25 percent of Program funding for Los Angeles and recommend consideration of a still larger allocation to the region.</p> <p>Los Angeles has more than double the number of census tracts in the top 5 percent of CalEnviroScreen scores as Fresno – and five times the number of any other city in the state. Likewise, Los Angeles has 75 percent more residents than Fresno who experience pollution burdens in the state’s top 5 percent. Given the significant proportion of disadvantaged communities in Los Angeles, it would be wholly appropriate for the city to be the primary recipient of Program funding. And so we urge the Council to consider increasing the proportion of funds allocated to Los Angeles by either equalizing the allocation between Fresno and Los Angeles at 37.5 percent each or flipping the proposed allotments to provide Los Angeles with 50 percent and Fresno with 25 percent of Program funding.</p>
<p>36</p>	<p>(CityLA; 0018-2)</p> <p>A minimum allocation of 25% of the funds is a welcome boost, but I encourage the Council to consider a more equitable share of the fund for Los Angeles. Increasing the proposed minimum to 33% would allow more partnerships to come forward to meet the existing needs in our disadvantaged communities.</p>

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	<p><u>Response to Comments 34-36:</u> Rejected.</p> <p>The Council exercised its discretion in prioritizing the cities of Los Angeles and Fresno because it found high concentrations of census tracts identified as disadvantaged communities in the cities of Fresno and Los Angeles using CalEnviroScreen. The City of Los Angeles has 85 census tracts and Fresno has 40 census tracts ranked in the top 5 percent of CalEnviroScreen. To give a sense of how concentrated 85 and 40 census tracts are in the state, the next highest city has 17 census tracts that rank in the 5 percent most disadvantaged. Council is confident its decision to select the cities of Los Angeles and Fresno is consistent with the provision of AB 2722, allowing the Council to “give priority to plans and projects that cover areas that have a high proportion of census tracks identified as disadvantaged communities and that focus on communities that are most disadvantaged.” (Public Resources Code § 75241(b)(2).)</p> <p>Second, the Council allocated 50 percent of Program funding to the City of Fresno because of its concentrated per capita poverty and depressed real estate market and fewer economic opportunities. This means that a higher level of state investment provides a greater chance of success. The Council did consider a more even allocation of funds between three locations and rejected the approach because it would reduce the potential catalytic effects of large investments in Fresno. This is not to say the City of Los Angeles is less “investment-worthy,” but acknowledges the City of Los Angeles’s real estate market does not face the same degree of challenge compared to the City of Fresno’s. Indeed, as one commenter points out, the City of Los Angeles has many opportunities for private development and investment compared to the City of Fresno.</p> <p>For these reasons, the Council finds the selection of the cities of Fresno and Los Angeles with a third location to be determined in the future, separate process consistent with AB 2722. Therefore, the Council declines to revise the proposal as suggested in the comments.</p>
	<p align="center">CONSIDER SELECTION FOR REMAINING 25% OF PROGRAM FUNDS</p>
<p>37</p>	<p>(CCA EJ; 0037-1), (WWRC; 0038-1), (CCA EJ; 0039-1), (CLCV; 0037-1), (CLCV; 0040-1), (LCJA; 0048-4), (Grid Alt. 0012)</p> <p>We are advocating very strongly that the Inland Region, particularly the western part of the two counties (Riverside and San Bernardino Counties), be considered for that third region.</p>

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	<p>In order to really concentrate and do a good job of making some progress and demonstrating that the projects will meet the needs of TCC, we're really proposing that we focus on the San Bernardino area.</p> <p>We have developed broad-base support to show that the region is ready to implement the program and make it a great success. Our region is made up of hard-working people who are raising families and striving for a better life... beyond need, we have a lot of the right partners in place to make this successfully implemented. We have projects ready to go and when the Rules are written it sounds like they were talking about the Inland Region.</p>																														
<p>38</p>	<p>(CEJA; 0023-1), (SCOPELA; 0045-2), (CEJA; 0047-1), (CBC; 0064-1)</p> <p>Designate the Inland Valley, in particular San Bernardino County, as the third regional TCC allocation...based on the high percentage of disadvantaged communities in the region and the opportunities for successful TCC implementation based on local capacity and engagement.</p> <table border="1" data-bbox="370 852 1386 1234"> <thead> <tr> <th>City</th> <th>Total Population</th> <th>Population in Top 5% DACs</th> <th>% of City Total Population is in DAC</th> <th># of Tracts in Top 5%</th> <th># of Tracts in City</th> </tr> </thead> <tbody> <tr> <td>Fresno</td> <td>477,468</td> <td>188,307</td> <td>39%</td> <td>40</td> <td>103</td> </tr> <tr> <td>Los Angeles</td> <td>3,788,402</td> <td>328,331</td> <td>9%</td> <td>85</td> <td>999</td> </tr> <tr> <td>San Bernardino</td> <td>210,171</td> <td>77,543</td> <td>36%</td> <td>14</td> <td>41</td> </tr> <tr> <td>Riverside</td> <td>296,785</td> <td>38,855</td> <td>13%</td> <td>9</td> <td>64</td> </tr> </tbody> </table> <p align="center"><i>Source: http://oehha.ca.gov/calenviroscreen/report/calenviroscreen-version-20</i></p>	City	Total Population	Population in Top 5% DACs	% of City Total Population is in DAC	# of Tracts in Top 5%	# of Tracts in City	Fresno	477,468	188,307	39%	40	103	Los Angeles	3,788,402	328,331	9%	85	999	San Bernardino	210,171	77,543	36%	14	41	Riverside	296,785	38,855	13%	9	64
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<p>39</p>	<p>(CityOakland; 0019-5)</p> <p>If SGC declines to revise the guidelines at this time, then I respectfully request that Oakland be selected as the third location to receive 25 percent of the TCCP funds. Oakland provides appropriate geographic balance to the Central Valley and Southern California, and is a worthy selection in our own right, given our high levels of poverty and air pollution, and strong commitments to greenhouse gas reduction, resilience and community-based planning.</p>																														
<p>40</p>	<p>(Livermore; 0028-1)</p> <p>The Livermore Area Recreation and Park District wishes to be eligible for</p>																														

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	<p>funding for Cap and Trade, so we would suggest the Bay Area or at least the East Bay Area be added to the list of eligible locations for funding.</p>
41	<p>(Mr. Moretti; 0009-1)</p> <p>Would love you to consider Bakersfield and a collaborative effort to put homeless and parolees to work. One of our joint efforts has already succeeded in putting 56 homeless to work weekly, changing lives. We've won awards and presented at League of CA Cities and at Harvard.</p>
42	<p>(TPL; 0004-6), (SanBernCounty; 0057-1)</p> <p>We suggest that the third location where the final 25% of funds will be spent be the Inland Empire, within San Bernardino and/or Riverside Counties, as those regions score highest among top 5% of DACs in terms of their CalEnviroScreen Score, after the cities of Fresno and Los Angeles.</p>
43	<p>(CityRichmond; 0020-1)</p> <p>The third community to receive TCC funding should be a disadvantaged community from the Northern California region. Selecting a Northern California community will ensure an equitable distribution of resources to underserved and disadvantaged California residents.</p>
44	<p>(SBC; 0021-2)</p> <p>We request that the Council consider using some portion of the remaining 25% to pilot a rural-specific program that can focus on forest health and biomass utilization as a means of reducing greenhouse gas (GHG) emissions from wildfire and certain forest treatments. A report by the Legislative Analyst’s Office has indicated that forest health is one of the most cost-effective ways of achieving GHG reductions. A suite of competitive rural projects within the TCCP program will meet the goals of reducing GHG emissions while creating local jobs, improving public health, and increasing resilience of our natural resources. Such a program would provide complementary benefits to the urban-focused projects in the Fresno and Los Angeles areas.</p>
	<p><u>Response to Comment 44</u></p> <p>The Council recognizes an implied comment, here. Comment 28 includes support for the proposed allocation of funds. No revisions are needed to the proposed regulation from this implied comment.</p>

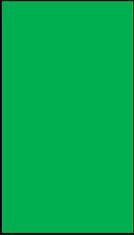
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45	<p>(CEJA; 0023-2), (CEJA; 0047-2)</p> <p>If SGC decides against specifying a region for the third allocation, we strongly recommend that funding goes toward other disadvantaged communities beyond the cities of Fresno or Los Angeles in order to create a more equitable distribution of TCC resources across the state.</p>
46	<p>(LCJA; 0016-2)</p> <p>We support the allocation of the remaining \$70 million in this round of funding to Los Angeles and the Inland Empire.</p>
	<p><u>Response to Comment 46</u></p> <p>The Council recognizes an implied comment, here. Comment 28 includes support for the proposed allocation of funds. No revisions are needed to the proposed regulation from this implied comment.</p>
47	<p>(SCAQMD; 0032-1), (CCA EJ; 0033-1)</p> <p>The South Coast Air Quality Management District is supportive of efforts to accelerate greenhouse gas reductions that will have concurrent criteria pollutant and toxic risk reductions that will reduce localized and regional air quality impacts and provide health benefits to disadvantaged communities in San Bernardino. There is a clear need for additional air quality programs in San Bernardino. San Bernardino County experiences some of the worst air quality in the nation with exceedances of the federal 8-hour ozone standard and higher concentrations of PM2.5 than other parts of the South Coast Air Basin.</p>
48	<p>(CEJA; 0023-1), (SCOPELA; 0045-2), (CEJA; 0047-1), (CBC; 0064-1)</p> <p>Designate the Inland Valley, in particular San Bernardino County, as the third regional TCC allocation...based on the high percentage of disadvantaged communities in the region and the opportunities for successful TCC implementation based on local capacity and engagement.</p>

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	City	Total Population	Population in Top 5% DACs	% of City Total Population is in DAC	# of Tracts in Top 5%	# of Tracts in City
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	<i>Source: http://oehha.ca.gov/calenviroscreen/report/calenviroscreen-version-20</i>					
49	<p>(CityOntario; 0034-1)</p> <p>Consider the City of Ontario as the third location for funding from the Transformative Climate Communities (TCC) Program.</p> <p>Ontario’s downtown area is in the 98th percentile for pollution burden, the 97th percentile for unemployment, and the 80th percentile for poverty. Within Ontario, 45,002 residents, or approximately ¼ of Ontario’s entire population, live in the top 5% of the most disadvantaged census tracts in California. Ontario residents- children and adults- are afflicted with asthma, diabetes, obesity at a rate higher than that found in either the County of San Bernardino or the State of California. Ontario has the third highest Regional Housing Needs Assessment (RHNA) obligation in the SCAG region (behind only Los Angeles and Irvine).</p> <p>Commenter also provides various locally adopted plans, projects and aspirations to show why the City of Ontario “would be well positioned to leverage public funding and stimulate private investment.”</p>					
50	<p>(SCTA/RCPA; 0036-2)</p> <p>Many disadvantaged neighborhoods in Sonoma County will benefit greatly from GHG reduction projects focused on providing better, cleaner, and safer access to schools, employment centers, and services. These areas are often poorly served by clean transportation modes or have inadequate alternatives to automobile travel. Improving travel alternatives in these areas would reduce GHG emissions and improve the economic, social, and physical health of these disadvantaged communities.</p>					
51	<p>(CityOakland; 0019-4)</p>					

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	<p>Given Oakland’s ethnic, linguistic, and economic diversity, a TCCP project in Oakland would stand as a compelling model for others. Oakland would be a very strong candidate if there was competitive portion of the program.</p>
<p>52</p>	<p>(SCAG; 0013-2)</p> <p>As the State continues to develop guidelines, selection criteria, and implementation procedures for the Program, SCAG strongly urges the Strategic Growth Council to allocate the remaining 25% of TCC resources to within the SCAG region. Cities within the SCAG region contain the overwhelming majority of the most deeply impacted Disadvantaged Community (DAC) census tracts and population in California.</p> <p>Allocating the remaining 25% of TCC resources in the SCAG region will facilitate implementation of our recently adopted 2016-2040 Regional Transportation Plan and Sustainable Communities Strategy (2016 RTP/SCS), which envisions equitable infill development coordinated with a range of transit and non-vehicular mobility investments to accelerate reduction of greenhouse gas emissions.</p>
	<p><u>Response to Comment 52</u></p> <p>The Council recognizes an implied comment, here. Comment 28 includes support for the proposed allocation of funds. No revisions are needed to the proposed regulation from this implied comment.</p>
<p>53</p>	<p>(CityOakland; 0019-7)</p> <p>In Oakland, TCCP funds would advance its legislative purpose by supporting community plans in our underserved and disadvantaged communities of color. The City of Oakland is poised to implement transformative projects called for in Oakland’s Energy and Climate Action Plan and recently published Resilience Playbook. Our new Department of Transportation’s Strategic Plan shows a deep commitment and measurable benchmarks to improve transportation equity and GHG reductions. For example, TCCP funds could implement the East Oakland Community Streets Plan to enhance transit, pedestrian, and bicycle friendly facilities in one of Oakland’s most marginalized neighborhoods, and leverage deeper investments in housing, transportation, and sustainability.</p>

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<p>54</p>	<p>(SanBernCounty 0030-1), (SanBernCounty; 0030-3), (OmniTrans; 0031-1)</p> <p>We would like to extend an invitation to you and your staff to host a public hearing in San Bernardino County to receive valuable input from a variety of local stakeholders to ensure the regional allocations reflect the goals of the Transformative Climate Community (TCC) Program prior to making any determination on the unallocated portion of the program.</p> <p>This invitation is to support the agency's efforts to implement TCC in the spirit of AB 2722, which was created to fund neighborhood-level plans that demonstrate community engagement and multiple, coordinated benefits for disadvantaged communities, learn more about the projects that are currently underway, and to consider designating San Bernardino County as the third regional TCC location.</p>
	<p><u>Response to Comments 37-54:</u> Rejected.</p> <p>The Council appreciates the comments submitting recommendations for a third location in the express terms of this proposed rulemaking. As described above, however, the Council designates the cities of Los Angeles and Fresno using its discretion as to the precise manner for how to allocate Program funds. The Council will consider the third location in a future, separate process and will consider comments related to the remaining Program funds at that time.</p> <p>The Council’s selection of the third location will be consistent with AB 2722’s definitions and desired outcomes. Namely, the Council will use CalEnviroScreen to identify “disadvantaged communities” and <i>may</i> give priority to areas that have a high proportion of census tracts that are most disadvantaged. (Public Resources Code 75240, 75241(b)(2)).</p> <p>Therefore, for these reasons, the Council declines to revise the proposal to designate a third location at this time.</p>
<p>EXPAND PROGRAM ELIGIBILITY TO A LARGER GEOGRAPHIC SCALE.</p>	
<p>55</p>	<p>(LA County; 0001-2, LA County 0001-4)</p> <p>With many region-wide initiatives underway to secure more parks, expand our transit infrastructure, and combat the housing crisis, there is a missed opportunity to address sustainability at a regional scale and to fully meet the intent of the Transformative Climate Communities Program.</p>

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	<p>The proposed regulation also has the unintended effect of not promoting multijurisdictional collaboration. This is a major barrier for planning efforts in fostering more interconnected and equitable development throughout the State, especially in unincorporated areas and smaller cities. The State should promote such efforts, particularly when eligible jurisdictions can demonstrate their capacity to manage funding effectively and work collaboratively.</p>
<p>56</p>	<p>(SoCalGas; 0022-1)</p> <p>In order to obtain diversity of grant applicants and in order for projects to truly include “multiple, coordinated GHG reductions strategies,” as stated in 2722, we recommend expanding the areas to the county-level. Limiting applicants to submit projects within city boundaries will needlessly reduce the pool of potential projects and reduce the opportunities for cross-cutting innovation. By opening up to the county-level SGC will allow for integration of more greenhouse gas (GHG) reduction strategies and infrastructure enhancements.</p> <p>Many adversely impacted communities face unique challenges that transcend city-boundaries. For example, in Los Angeles, the majority of the communities adjacent to the I-710 transportation corridor would be excluded from a TCC grant. Even though the I-710 is known in the region to be both a vital transportation artery and a major environmental health problem, under the proposed funding eligibility rules, the communities adjacent to the I-710 would not be able to benefit from TCC projects. For these reasons, SoCalGas suggests changing the proposed rulemaking language to reference the eligible grant areas to “<i>County of Fresno</i>” and “<i>County of Los Angeles</i>.”</p>
<p>57</p>	<p>(LAEDC; 0029-2)</p> <p>The “need” for a TCC Program extends beyond simply the City of Los Angeles and City of Fresno within these two regions. As such, the commenter recommends the language be broadened to include all of the County of Los Angeles and the counties within the San Joaquin Valley.</p>
<p>58</p>	<p>(LA County; 0001-1)</p> <p>We recommend that further consideration be given to Los Angeles County (unincorporated areas and cities) for the allocation of funds.</p>
	<p><u>Response to Comments 55-58:</u> Rejected.</p>

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The Council’s decision to specify the cities of Fresno and Los Angeles instead of a larger geographic scale is necessary to ensure successful implementation of AB 2722.

AB 2722 identifies “making comprehensive public investments” such that “private resources can be more effectively catalyzed” to support transformation. Significant public investment is required for the development and implementation of AB 2722’s goal of neighborhood-level, transformative climate community plans that benefit the state’s disadvantaged communities. Here, the provisions of this proposed regulation allocates the finite amount of Program funds in a way that ensures large investments to areas with the state’s highest concentrations of most disadvantaged communities, rather than making numerous and comparatively small awards.

We want to specifically address some commenters’ request to change the scale of jurisdiction: from “City” to “County.” Council chose the “City” scale for funding eligibility to ensure a targeted, catalytic public investment necessary for community transformation. The Council considered, but rejected, an alternative approach: awarding funds to neighborhoods judged on a competitive basis. Council rejected this approach because it would not allow for the scale of investments that are likely needed to catalyze transformation. The Council also concluded that the express terms of this proposed regulation are reasonably necessary because of the finite amount of Program funds. As a result, the Council has decided to *focus* these initial investments on the communities that are most impacted by poverty and pollution where a substantial state investment can promote significant change.

Designating the cities of Fresno and Los Angeles neither forecloses nor discourages multijurisdictional collaboration, diversity of grant applicants or opportunities for crosscutting innovation. Notably, one example of a multijurisdictional, cross-cutting effort is already underway; the City of Fresno’s General Plan and Zoning Ordinance adopted in 2014 and 2016, respectively. Those efforts direct approximately half of new growth to infill areas, along with large-scale transportation investments, such as the state’s first High-Speed Rail station (a piece of a multi-jurisdictional project.) Agencies responsible for land use planning, local, regional and state transportation planning, housing, economic development, environmental justice and more, can work together to achieve multiple goals. We anticipate that Program funds will serve to encourage and implement these kinds of multijurisdictional, cross-cutting efforts.

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	<p>In response to expanding eligibility due to “need,” the Council has exercised its discretion to prioritize “plans and projects that cover areas that have a high proportion of census tracts identified as disadvantaged communities and that focus on communities that are most disadvantaged.” (Public Resources Code 75241(b)(2)) Similar to responses to Comments (enter numbers), the Council may, and has chosen to, prioritize based on the results from CalEnviroScreen.</p> <p>The Council’s exercise of authority to prioritize the state’s areas with the highest concentrations of the most disadvantaged communities pursuant to Public Resources Code 75241(b)(2) coupled with AB 2722’s directive to make “comprehensive public investments” supports the express terms of the proposed rulemaking.</p> <p>We do point out that the Council retains the authority to prioritize the third geographic location for the Program at a separate, future process. We look forward to working with stakeholders to further increase the likelihood these public investments can be scaled across jurisdictions.</p>
<p>DO NOT USE SPECIFIC GEOGRAPHIC LOCATIONS TO DETERMINE PROGRAM ELIGIBILITY.</p>	
69	<p>(LA County; 0001-3)</p> <p>We suggest a different methodology, one that does not determine the allocation of program funds for specific geographic locations. Limiting resources to one jurisdiction excludes others that are also equally disadvantaged. In the disadvantaged unincorporated communities of Los Angeles County, for example, there are a total of 42 census tracts that are at or above the 95th percentile in CalEnviroScreen, with a total population of 140,593 living in the unincorporated area portion of those census tracts. As shown in the attached map, these census tracts are located throughout the south and southeast region of Los Angeles, and most of the communities border the City of Los Angeles.</p>
60	<p>(Mr. Jaber; 0010-2)</p> <p>I recommend the money should be either be scattered among several regions at \$1 - \$3 million.</p>
61	<p>(MTC; 0005-1)</p> <p>We find it highly unusual for a state agency charged with administering a new</p>

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	<p>competitive grant program to propose limiting funds to just three jurisdictions statewide in advance of reviewing any project applications. We believe this sets a troublesome precedent for the distribution of TCCP funds in future years, as well as other SGC-administered programs.</p>
<p>62</p>	<p>(Alameda CTC; 0011-1), (CityOakland; 0019-1), (San Mateo TD; 0014-1), (SCTA/RCPA; 0036-1)</p> <p>We express concern that even though the TCCP was set up as a competitive statewide program, the proposed rulemaking is suggesting directing 50 percent of funds to the City of Fresno, 25 percent to the City of Los Angeles, and the remainder for a third yet-to-be-determined location.</p>
<p>63</p>	<p>(Alameda CTC; 0011-3), (CityOakland; 0019-2), (San Mateo TD; 0014-3)</p> <p>Alameda CTC recommends that the guidelines provide a more open competition for TCCP funds.</p>
<p>64</p>	<p>(MTC; 0005-3), (Alameda CTC; 0011-2), (San Mateo TD; 0014-2)</p> <p>SGC should also consider that limiting TCCP funds to just three jurisdictions reduces the potential GHG reductions and co-benefits that could be realized from the program. Every disadvantaged community in California is likely to have greenhouse gas reduction projects that would provide local, economic, and environmental and health benefits, as sought in AB 2722. By limiting where TCCP funds can be spent at the outset, SGC is ruling out consideration of projects in other communities that might provide greater or earlier GHG reductions, potentially resulting in more transformational change or greater co-benefits.</p>

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65	<p>(LAEDC; 0029-3)</p> <p>Funding should not be restricted by funding share to a specific city within a particular year, but instead prioritize funding to ensure money is allocated to the “best and highest use” projects within a particular year.</p> <p>For example, provide first priority funding to Los Angeles and San Joaquin Valley areas with CalEnviroScreen scores above 81 percent; provide second priority funding to areas that have a CalEnviroScreen Score above 81 percent; and provide third priority funding to areas that have a CalEnviroScreen Score above percent. This ensures that if there are insufficient numbers of quality funding applications for the funding in a given year, the funding can still be utilized to make a difference in places that need it in the next priority level.</p> <p>This rigid prescription does not account for the potential of having only a few quality applications from just one city, which would markedly undermine the overall impact of this program on the communities that need it the most.</p>
66	<p>(CityLA; 0018-3)</p> <p>Council should be open to allowing LA communities to compete beyond any minimum allocation to ensure the most impactful investments be made to improve the lives of disadvantaged communities while reducing greenhouse gas emissions.</p>
67	<p>(Kern COG; 0002-3)</p> <p>Use Same Methodology to Award Remaining Funding as for Fresno -The TCC Program should provide the remaining \$35 million in funding to the community with the next highest number of disadvantaged census tracts using the same method that was used to identify Fresno.</p>
	<p><u>Response to Comment 67</u></p> <p>The Council recognizes an implied comment, here. Comment 28 includes support for the proposed allocation of funds. No revisions are needed to the proposed regulation from this implied comment.</p>
68	<p>(TPL; 0004-7)</p> <p>We are pleased to see that all TCC program grants will be awarded pursuant to a competitive process and believe that this is essential to the success and</p>

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	<p>defensibility of the program going forward. We suggest that a separate competitive process be held in each of the three selected regions.</p>
<p>69</p>	<p>(CityOakland; 0019-3)</p> <p>SGC should distribute at least 30 percent of the funds through a competitive process.</p>
<p>70</p>	<p>(SCTA/RCPA; 0036-3)</p> <p>Limiting Program funds to just three jurisdictions reduces the potential to reduce GHG emissions statewide and would exclude sensitive areas that are in desperate need of improvements to local infrastructure, services, and the environment. Many rural areas are overlooked and unidentified as disadvantaged communities when applying current criteria. These many scattered communities would benefit from GHG reduction projects which would undoubtedly provide statewide, regional, and significant local benefits. By limiting where TCCP funds can be spent at the outset of the program, SGC is ruling out consideration of projects in other communities that might provide considerable greenhouse gas reductions and other community benefits. SGC should provide flexibility in the distribution of funds in order to ensure that the goals of AB 2722 are met and that the widest range of disadvantaged communities have a chance of being considered for much needed funding.</p> <p>We recommend that you revise the guidelines to provide more open competition for TCCP funds.</p>
	<p><u>Response to Comments 59-70:</u> Rejected.</p> <p>The Council selected the proposed approach because this type of targeted investment is more likely to attract catalytic resources necessary for transformation compared to numerous and comparatively small awards.</p> <p>The Council agrees with the comments urging us to allocate Program funds based on a competitive model. As explained in the Initial Statement of Reasons, all Program grants shall be awarded pursuant to a competitive process as prescribed in Public Resources Code 75241(a). No revision to this proposal is required, however.</p>

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	<p>The Council finds it necessary to identify at least two specific locations (the City of Fresno and the City of Los Angeles) to ensure the targeted, catalytic public investments necessary for the community transformation that AB 2722 intends to achieve. As explained in the Initial Statement of Reasons, the Council found that a statewide, competitive grants model at the neighborhood level would not allow for the scale of investments that are likely needed to catalyze transformation. By leveraging public investments to attract private investment, neighborhoods can become communities where businesses have access to workers, workers have access to jobs, and residents have access to safe, environmentally sound places to live.</p> <p>Lastly, as explained in the Initial Statement of Reasons, the Council will designate a third location in a future, separate public process, allowing for additional flexibility in the Program’s ability in achieving AB 2722’s goals.</p> <p>Therefore, for the reasons described above, the Council declines to revise the proposal as suggested in the comments.</p>
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C. COMMENTS OUTSIDE THE SCOPE OF THE EXPRESS TERMS OF THE PROPOSED REGULATION

While the Council is not required to respond to comments beyond the scope of the proposed regulation, it does so as a courtesy to commenters.

CONSIDER THESE IDEAS IN PROGRAM GUIDELINE DEVELOPMENT	
71	<p>(CityOakland; 0019-6)</p> <p>While we are very proud and pleased with our recent AHSC awards, this success should not distract SGC from addressing Oakland’s environmental justice problems including asthma, carcinogen exposure, and life expectancy that AHSC projects do not address.</p>
72	<p>(Kern COG; 0002-5)</p> <p>The potential for reducing sprawl onto farmland should be a major consideration in awarding of the final \$35 million in funding. The community with the highest potential growth rate, a large disadvantaged community, as well as the potential to promote infill housing rather than providing housing on periphery (farmland), would be able to demonstrate the greatest potential benefit for GHG reduction, preservation of farmland, and</p>

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	Disadvantaged Communities.
	<p><u>Response to Comment 72</u></p> <p>The Council recognizes an implied comment, here. Comment 28 includes support for the proposed allocation of funds. No revisions are needed to the proposed regulation from this implied comment.</p>
73	<p>(Kern COG; 0002-6)</p> <p>The funds should be used in communities that have an opportunity for High Quality Transit such as High Speed Rail.</p>
74	<p>(REV; 0026-4)</p> <p>As a prerequisite for larger TCC funding commitments, key stakeholder organizations should be asked to join one of what could be a series of TCC funded peer cohort trainings designed to help each create their own organizational sustainability action plans while at the same time working together to build and deliver on particular TCC objectives.</p> <p>Peer cohort trainings offer a versatile engagement process that can both help TCC stakeholders become more sustainable and at the same time help them work together to develop specific and impactful GHG reducing initiatives where TCC funds are leveraged for increased results.</p> <p>We submit that to better ensure the best outcomes for these targeted and high impact investments, the TCC should initially invest at least 5% of the funding in such a proven engagement process.</p> <p>We submit that a key component in the TCC program and criteria should be to utilize the benefits of peer cohort engagement processes to make those program outcomes much more predictive.</p>
75	<p>(CityRichmond; 0020-4)</p> <p>Local climate equity leadership and innovation in resiliency solutions should be considered as part of the TCC guidelines. The TCC’s ability to facilitate strategic investments will be the most effective in communities with an established policy framework and track record of leadership with public health and climate change initiatives.</p>

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76	<p>(TPL; 0004-2)</p> <p>It is imperative that anti-displacement measures are mandated with use of TCC program funds so that current residents and businesses are not priced out of their communities as a result of program benefits. SGC’s AHSC sets a precedent for this and we believe that anti-displacement strategies should be both mandatory in the TCC program and further incentivized in project scoring. We encourage SGC to devote at least 10% of project scoring to promote enhanced anti-displacement measures.</p>
77	<p>(CEJA; 0023-5), (SCOPELA; 0045-4), (CEJA; 0047-4)</p> <p>Include clear criteria and measurements to prevent displacement in the guidelines. AB 2722 includes language that requires SGC to “consider” whether projects avoid economic displacement in the guidelines. SGC has an already-existing obligation to avoid both economic and physical displacement for low-income disadvantaged community residents and businesses, as established under the [Air Resources Board’s <i>Cap-and-Trade Auction Proceed Guidelines for Agencies’ that Administer California Climate Investments.</i>]</p> <p>We recommend the following measures to minimize displacement through the TCC program:</p> <ul style="list-style-type: none"> ● SGC should only award grants for plans that are designed to avoid substantial harms, including economic and physical displacement of low-income disadvantaged community residents and small businesses. Although “businesses” is undefined in this policy, we recommend instituting protections that put a special emphasis on small and minority-owned local businesses. ● All TCC plans should include effective strategies to prevent resident and small business displacement. The TCC guidelines can accomplish this by requiring all plans to contain specific neighborhood stabilization strategies, including: efforts to prevent rapid rent increases such as rent control, obligations for creating 100% affordable housing, inclusionary zoning policies that require the building of affordable units (including units for extremely and very low income residents) in all new residential developments--or the payment of an in lieu fee, a local commitment to inserting an affordability requirement in the deeds of all public property sold in areas that receive funds, and other such policy tools. ● Additionally, if a plan or project involves demolition or rehabilitation of existing housing units affordable to or occupied by lower income households, those units must be replaced with the same or greater number

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	<p>of units affordable to the current occupants and with a right of return for any displaced households.</p> <ul style="list-style-type: none"> ● SGC should publicly track and report on all TCC anti-displacement efforts, whether quantitatively or qualitatively, and explore ways to assess displacement over time in a TCC area.
<p>78</p>	<p>(LAEDC; 0029-5)</p> <p>Commenter recommends a “partnership” requirement on these projects to ensure that applicants come in with a team of partner organizations that can successfully complete and fulfill the program and/or the project within these communities, and thus improve environmental and economic outcomes accordingly. For example, a successful partnership might include the following partners: the local government(s) in question, an economic development organization representing the area, and an environmental or community-based organization that can bring the requisite expertise needed to improve environmental or equity outcomes within that community.</p>
<p>79</p>	<p>(LAEDC; 0029-4)</p> <p>A funding threshold should be set to encourage larger programmatic efforts that can have a transformative effect within a region. From the “Initial Statement of Reasons,” one of the primary aims of the program is to make a few large investments, as opposed to numerous and comparatively small investments, to ensure community transformation. In support of this goal to transform communities, the commenter encourages you to set a minimum threshold, which would serve as a built-in “back stop” to ensure that mostly transformational projects are attracted, rather than placing a call for projects that list no dollar amount.</p>
<p>80</p>	<p>(CityRichmond; 0020-3)</p> <p>The SGC should implement the TCC with a comprehensive equity framework.</p>

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81	(MTC; 0005-6) We further request that the guidelines make clear that disadvantaged communities with a CES score in the top 5-25% range remain eligible for current and future [rounds of funding].
82	(REV; 0026-2), (REV; 0026-3) As a part of the criteria development process, the SGC should utilize related work already done in the field so it can build a program that has best-in-class criteria that can be copied, perfected and put to use anywhere as soon as possible. One example of related work that can be put to good use in the criteria development process is a recent initiative by the U.S government to spark transformative economic development and job creation. Focused on the manufacturing sector and its public and private ecosystem of support necessary to achieve desired outcomes, this White House led collaborative called the Investing in Manufacturing Communities Partnership (IMCP) draws from strong evidence showing two things. First, as a driver of more sustainable economic development, manufacturing as a sector punches above its weight. That is, of any economic sector, the greatest positive ripple effect that benefits the wider community and its people comes from a robust and sustainable manufacturing sector. Second, as with any economic development initiative to include those with a focus on GHG reductions, building an ecosystem of support amongst key stakeholders is a prerequisite to collective transformation. To succeed, that set of stakeholders needs an engagement process to evaluate strengths and opportunities for collective impact on the way to developing the best possible plans to achieve predictive outcomes. An example for application to the TCC is the IMCP Playbook designed to help communities make this kind of transformation in the manufacturing context. http://www.manufacturingcommunities.org/playbook.html Not incidentally, two of IMCP's designated communities already include the cities of Fresno and Los Angeles, so we recommend that the SGC engage stakeholders in those efforts and related others who are already working to

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	use these tactics to find and build collaborative synergies.
83	(Climate Resolve; 0007-3) It is important that anti-displacement strategies are integral to any new infusion of funds to a community, so as to not lose core transit riders to the suburbanization of poverty.
84	(Climate Resolve; 0007-4) I encourage you to not downplay the impact of programmatic efforts, such as employer-based incentive schemes and similar mechanisms that attempt to tilt the scale towards favoring climate-friendly everyday behavior.
85	(Climate Resolve; 0007-2) I encourage you to err on the side of not being overly restrictive. For the types of comprehensive, integrated projects that were intended with AB 2722's creation of the TCC program, it may be that NGO actors are better-suited to serve as project managers as they may have more imaginative capacities regarding the potential for change.
86	(WWRC; 0038-1) The Transformative Climate Community Program is a great opportunity for us to begin reshaping the way the warehouse industry operates. We must transform this industry and collectively with our community build the programs and infrastructure needed to benefit all those that the industry impacts from the residents such as me and my children, my family, to the workers who are exposed to the pollutants the industry draws in whether we approve of this or not.
87	(Asm. Arambula; 0044-2) We need to be focused in our investments to make sure that we are transforming and are the example for the rest of the state.
88	(Plug in America; 0008-1) We encourage an allocation of investment be spent on strategic placement of charging infrastructure in these communities. Specifically, the funding should be prioritized to ensure access to adequate L1 charging (120V)

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	stations, workplace charging stations and DC fast charging stations.
89	<p>(Plug in America; 0008-2)</p> <p>Should an allocation of investment be spent on car-or ride-sharing programs, we encourage the Transformative Climate Community Program to require the use of PEVs for these ride-sharing programs, and not gasoline vehicles.</p>
90	<p>(Ms. Villasenor; 0051-3), (Mr. Mendez; 0062-2)</p> <p>I would also like to see improvement to the transit services and to focus on some of those people that suffer some type of disability.</p>
91	<p>(LCJA; 0063-2)</p> <p>We really want to see Bus Rapid Transit realized in our Fresno community.</p>
92	<p>(Asm. Arambula; 004f-3)</p> <p>Affordable housing should be part of this solution.</p>
93	<p>(SoCalGas; 0022-2)</p> <p>SoCalGas is concerned that there is an over-emphasis on new “infill” projects.</p> <p>SoCalGas recommends that SGC consider broadening the program’s focus to encourage projects from a wider range of GHG-reducing strategies in a way that more embodies the intent of 2722 to “fund the development and implementation of neighborhood-level transformative climate community plans that include multiple, coordinated greenhouse gas emissions reduction projects that provide local economic, environmental, and health benefits to disadvantaged communities.”</p> <p>Such projects may also offer protection against economic displacement, another goal of AB 2722.</p> <p>For example, funding a project that includes upgrading the building envelope and ventilation systems for existing housing at the neighborhood-scale along a major transportation corridor can have immediate beneficial health impacts through indoor air quality improvements and energy saving impacts that promote health benefits while reducing GHGs. This approach</p>

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	also invests directly in the assets of disadvantaged communities, reinforcing home values and protecting against displacement.
94	Response: This proposed regulation does not foreclose the opportunity for the Council to invest in specific project types. AB 2722 does require that projects “maximize climate, public health, environmental, workforce, and economic benefits” as well as “demonstrating that it will achieve a reduction in emissions of greenhouse gases.” (Public Resources Code 252413(e) and 252413(c), respectively).
95	(HACLA; 0006-2) Housing Authority of the City of Los Angeles recommends that the Strategic Growth Council implement a rule designating a funding set-aside and/or preferential scoring for eligible public housing redevelopment projects that meet TCCP program requirements. A set-aside or preferential scoring for public housing sites, which are home to some of the densest concentrations of vulnerable populations subjected to high pollution burdens in the state, would amplify the impacts of the TCCP funding in these communities and ensure that the program meets its goal of targeting greenhouse gas emission reductions in disadvantaged communities.
96	(Mr. Jaber; 0010-3) What I seriously question is why a region would need \$70 million or even \$35 million for planning. In 2010-2011, the U.S. Housing and Urban Development launched very similar regional sustainability planning efforts for larger, multi-county regions. Much of the South Central Valley was in fact covered by an effort involving Sacramento COG and UC Merced. Those comprehensive plans were funded at \$1 million-\$2 million, covering a broader scope, and I felt those I was involved with still had some level of over planning. And what implementation has been done, now that the plan is complete? I recommend the money should be either be scattered among several regions at \$1 - \$3 million. Remaining money should go into implementation of GHG emission reduction projects. You don’t need \$35 million for planning.
97	Response: Council shall also “make grant selections for plan development contingent on the implementation of one or more projects identified in the plan.” (Public Resources Code (b)(1)). This element ensures Council will not fund a plan without implementation.

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<p>98</p>	<p>(Asm. Arambula; 0044-5)</p> <p>We have to make the hard investments into our roads, into our technology grid to be able to ensure that we can grow as quickly as we should.</p>
<p>99</p>	<p>(SJVHF; 0053-4)</p> <p>Let's have connectivity that is reducing greenhouse gas emissions.</p>
<p>100</p>	<p>(SJVHF; 0053-3)</p> <p>Let's not have industry placed in places where community residents that are low-income are living.</p>
<p>101</p>	<p>(GatewayCOG; 0035-2)</p> <p>Commenter looks forward to seeing program criteria that reward the type of collaborative regional planning GatewayCOG jurisdictions have been engaged in for many years. Commenter includes Resolution No 2016-03 for an overview of these jurisdictions' efforts.</p>
	<p><u>Response to Comments 71-101:</u></p> <p>As provided in AB 2722, the Council will develop Guidelines establishing selection criteria and other Program details. Specifically, AB 2722 provides:</p> <p>“Council shall consider comments, if any, from local governments, regional agencies, and other stakeholders. Council will conduct outreach to disadvantaged communities to encourage comments on the draft guidelines and selection criteria from those communities.”</p> <p>“Council shall consider whether eligible plans and projects avoid economic displacement of low-income disadvantaged community residents and businesses.”</p> <p>The Council will determine selection criteria for the competitive grant award process in a separate, future, process consistent with Public Resources Code 75243. As explained in the Initial Statement of Reasons, this regulation is limited to designating geographies, and allocations between those geographies, where Program investments may be made. Therefore, no revision to the proposal is required in response to these comments.</p>

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EMPLOY AND REQUIRE MEANINGFUL COMMUNITY ENGAGEMENT PRACTICES.	
102	<p>(SCAG; 0027-1)</p> <p>When investing into a community of need/socioeconomically challenges (or anywhere specifically), it is imperative to engage the target population for not only functionality input (where something will go, who can access etc.), but for cultural resources as well, innovatively connecting the history, customs, identity, and collective vision of a people through visual and interactive opportunities within infrastructure development.</p> <p>For example</p> <ul style="list-style-type: none"> • Street and Signal signs that creatively and visually represent the city/regional demographic of people • Seeking public input for the naming of infrastructure developments • Incorporating regional history of people, place and culture through visual art and text within infrastructure opportunities • Engaging community and their connection to place/infrastructure through city/region-wide artistic efforts like the <u>Creative Corridor Challenge to Beautify North Long Beach</u> (mural paintings on blighted walls and utility boxes) • Through creative use of imagery, writing and storytelling, powerful messages can help to reach outcomes. • The process of art enables us to understand and prolong humanity. What makes us human is priceless, thus making the value of art astronomical (<u>Marek Dzida, Hellada Gallery</u>) • The combination of our scientific knowledge shared across agencies (numbers, data, systems) and the convergence of artistic processes that nonverbally speak to listeners could be the nexus between communication and resonance.
103	<p>(CEJA; 0023-3), (SCOPELA; 0045-3), (CEJA; 0047-5), (CityFresno; 0054-2), (FresnoBHC; 0060-5), (Ms. Padron; 0061-3), (CBC; 0064-3)</p> <p>Ensure that any TCC-funded plans incorporate direct, extensive and transparent community engagement.</p> <p>For California Environmental Justice Alliance members and partners, authentic community engagement means:</p> <ul style="list-style-type: none"> • Ensuring residents and community-based organizations from target investment neighborhoods and environmental justice communities in

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<p>funded regions are engaged in the process to create TCC project applications;</p> <ul style="list-style-type: none">● Ensuring residents and community-based organizations from target investment neighborhoods and environmental justice communities in funded regions have equal decision-making along with other stakeholders in plan development and implementation;● Ensuring SGC reaches out to community groups, hosts meetings and workshops in environmental justice communities, ensuring staff are accessible to community residents and community-based organizations;● Ensuring feedback from residents and community-based organizations from target investment neighborhoods and environmental justice communities in regions on project and plan implementation and evaluation is incorporated. <p>Concrete recommendations for achieving the goals outlined above include:</p> <ul style="list-style-type: none">● Producing communication materials that illustrate what community-led projects could look like, and highlighting the importance of these values during all public events. TCC promotional materials can include profiles of real projects that are models for effectively working with and serving local neighborhoods.● Designing guideline requirements to provide clear criteria and plans for community engagement for the design, selection, and implementation of the plans, for instance through a participatory budgeting process¹. The guidelines can also require equal decision-making by all parties working within a particular collaborative for TCC, and Memorandums of Understandings (MOUs) signed by all parties to outline their internal processes, decision-making structure, and funding agreements. Such MOUs should ensure transparent processes for project amendments during the course of implementation that require community approval of any plan change. <p>It is extremely important that all parties, including local agencies who are important partners on these projects, support deep community engagement. Unfortunately, local agencies can have gaps in their community inclusion strategies and difficulty maintaining effective grassroots partnerships. The end result could be a set of projects that do not fully reflect disadvantaged community needs in a region or have negative impacts on local disadvantaged communities, both of which would run counter to the intent of the TCC program.</p> <p>To avoid this outcome, SGC should provide clear guidance to local agencies at the City and County level on the need to create authentic working</p>
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	<p>relationships with residents and community-based organizations, and ensure that planning and projects put forward in TCC applications reflect the range of disadvantaged community needs and solutions in a region.</p> <p>SGC should provide clear guidance to local agencies at the City and County level on the need to create authentic working relationships with residents and community-based organizations, and ensure that planning and projects put forward in TCC applications reflect the range of disadvantaged community needs and solutions in a region.</p> <p>1 See http://www.participatorybudgeting.org/participatory-budgeting-white-paper/.</p>
<p>104</p>	<p>(SanBernCounty; 0030-2), (CCA EJ; 0033-2)</p> <p>It is critical that as the Strategic Growth Council develops the guidelines and crafts key policies, it include significant public dialogue and vetting with all stakeholders. Maintaining transparent and inclusive proceedings, accessible to all impacted stakeholders would allow this process to achieve a high level of accountability.</p>
<p>105</p>	<p>(LCJA; 0016-4)</p> <p>In establishing rules for the allocation of funding pursuant to the TCC program, the Strategic Growth Council must adhere to AB 2722 in requiring a meaningful community engagement process and must base its decisions on the outcome of this process. Applicants for funding must demonstrate that a meaningful public engagement process has informed the development of their application. Public engagement must include a representative population of the residents living in these communities, including in particular low-income communities of color and sub-populations within these communities, including African American, Latino, and East Asian populations. Outreach must be meaningful in that materials and presentations must be in all threshold languages, meetings and workshops must be in the evenings with childcare provided. To meet this requirement, applicants should pursue a multitude of partnerships with stakeholders and local community based organizations.</p>
<p>106</p>	<p>(CEJA; 0023-4)</p> <p>Ensure transparency and public engagement in the guideline development process.</p>

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107	<p>(TPL; 0004-5)</p> <p>SGC needs to provide outreach in DAC regions not currently receiving TCC funding to encourage local public and community leaders to identify specific needs and priorities around climate planning and to assist in developing plans that can lead to future TCC-type projects.</p>
108	<p>(GatewayCOG; 0036-3)</p> <p>Commenter hopes that [the Council] will help give GatewayCOG member jurisdictions the best possible support by providing a portion of the technical assistance funds set aside for disadvantaged communities by the Legislature in this year's budget for cap and trade funds.</p>
	<p>Response to Comments 102-108.</p> <p>AB 2722 provides language regarding community engagement and technical assistance in Program implementation. The “Council will work with CalEPA to provide assistance in performing outreach to disadvantaged communities.” (Public Resources Code 75241(d). Council will “fund technical assistance providers to assist in application development and project development and implementation.” (Public Resources Code 75242(b)). Lastly, the Council will “conduct outreach to disadvantaged communities to encourage comments on the draft guidelines and selection criteria from those communities, topic of a future, separate rulemaking.” (Public Resources Code 7543(b).)</p> <p>Because these comments address specific Program implementation that does not involve the scope of this regulation, the Council declines to make any revisions to the proposed provisions in response to these comments.</p>
	<p>SUPPORT LOCAL PRIORITIES IDENTIFIED IN PLANS, WORKSHOPS, RESEARCH AND OTHER MEANS.</p>
109	<p>(Mr. Jaber; 0010-4)</p> <p>I recommend the state leverage any relevant HUD planning and any other climate action plans that have already been done. Much effort goes into planning, and much of that so often isn't implemented, limiting its usefulness and the wisdom in funding the effort.</p>

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110	<p>(LCJA; 0016-5), (Mr. Mendez; 0062-5), (LCJA; 0063-1)</p> <p>We encourage SGC to look to the [Fresno] Southwest Specific Plan as a roadmap for investment of TCC dollars that not only has the support of the community but was developed by and for the community.</p>
111	<p>(CEJA; 0023-8), (SCOPELA; 0045-5), (CEJA; 0047-3), (LCJA; 0048-3), (Ms. Villasenor; 0051-2), (SJVHF; 0053-1), (Centro; 0059-2), (Fresno BHC; 0060-6)</p> <p>Ensure that TCC funds for the City of Fresno are directed to plans (such as the Southwest Specific Plan) that serve disadvantaged communities, particularly in West Fresno and Southeast Fresno.</p> <p>In order to comply with AB 2722, any funded plan for Fresno must: 1) establish connectivity within and across the city’s downtown area neighborhoods (especially for West Fresno), 2) tie investments back to improvements, and 3) achieve climate benefits alongside other co-benefits.</p>
112	<p>(CEJA; 0023-9), (SCOPELA; 0045-6)</p> <p>Ensure that TCC funds for the City of Los Angeles are directed to plans that serve the communities most disproportionately impacted by poor health outcomes resulting from proximity to industrial and toxic land uses.</p> <p>For many LA neighborhoods that have faced chronic disinvestment, public officials have viewed any development as “good development” and have thus engaged in top-down approaches that have not benefitted existing community members. Given this context, a focus on public health improvement and anti-displacement measures will be particularly important for awarding the LA funding allocation.</p>
113	<p>(MTC; 0005-5)</p> <p>If the SGC is committed to focusing TCCP funds on Fresno, Los Angeles and a third location in the program's first year, we respectfully request that this decision be made on the basis of specific needs the SGC seeks to address in those cities.</p>
	<p><u>Response to Comments 109-113</u></p> <p>As explained in the Initial Statement of Reasons, the Council will develop</p>

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	<p>Program Guidelines in a future, public process. Because these comments address specific Program implementation that does not involve the scope of this regulation, the Council declines to make any revisions to the proposed provisions in response to these comments.</p>
	<p>PRIORITIZE CERTAIN AREAS AND COMMUNITY RESIDENTS WITHIN PROPOSED JURISDICTIONS.</p>
114	<p>(LCJA; 0016-3), (LCJA; 0048-3), (CNCEF; 0055-1), (Ms. Becerrill; 0058-1)</p> <p>If used effectively, this funding can truly transform neighborhoods in Southwest Fresno, that rank as literally the most burdened by pollution in the entire state under CalEnviroScreen 2.0, along with the Downtown. Through commitment to a strong community process in the development of a plan for the allocation of funding to Fresno, TCC funding can transform with new economic opportunities, quality housing for households of all income levels, improved public health and access to daily necessities, while making strong contributions to reducing greenhouse gas emissions in the City and region.</p>
115	<p>(Ms. Barrios; 0046-1)</p> <p>I'm a resident of the southeast area of Fresno and thus I'm requesting for some of those resources to be invested in my community.</p>
116	<p>(Mr. Mendez; 0062-1)</p> <p>I hope this money is not going to be invested in the north side [of the City of Fresno.]</p>
117	<p>(FresnoBHC; 0060-3), (Mr. Mendez; 0062-4)</p> <p>Part of the challenges in Southwest Fresno is that we have completely disconnected that area from the rest of our city. And so if we're serious about creating economic opportunity we have to make sure that people in Southwest Fresno can connect to the rest of our city.</p>
118	<p>(LCJA; 0063-3), (CCWF; 0066-4)</p> <p>Need for connectivity in West Fresno. This area is incredibly disadvantaged and they lack access to really basic resources to meet their daily needs. They lack access to big grocery stores. They lack access to gyms, to banking facilities, so they have to be connected.</p>

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<p>119</p>	<p>(FresnoBHC; 0060-1)</p> <p>I want to make sure that the funds are utilized for their intended purpose to address poverty and pollution via greenhouse gas reductions and social environmental benefits in communities that are overburdened by pollution. And in Fresno, that community is unequivocally [zip code] 93706. And so we really can't talk about transformation in our city without addressing the many issues that have plagued this community for decades.</p>
<p>120</p>	<p>(FresnoFRC; 0056-2), (CBC; 0064-2)</p> <p>I absolutely support a robust Downtown, but we also recognize that the people are already in Southwest Fresno and so these dollars really should go to where people are.</p>
<p>121</p>	<p>(Ms. Vargas) 0050-1, (Ms. Padron; 0061-2), (Mr. Mendez; 0062-3), (LCJA; 0063-4), (CCWF; 0066-2)</p> <p>The problems that we are seeing in our [Southeast Fresno] communities have to be with the bad housing. We're asking you to help us reconstruct our community, our area. For us to have more parks for our children, more areas for them to ride their bikes, our streets are in really bad conditions. We're asking you for help, so we can rebuild our homes.</p>
<p>122</p>	<p>(CNCEF; 0055-2), (Ms. Padron; 0061-1), (CCWF; 0066-1), (CCWF; 0066-3), (CCWF; 0066-5)</p> <p>It has to go to communities that have been most impacted. It has to go where there has been the greatest need to invest in cleaning the air and reducing the number of toxic industries that impact people's health. And it has to go to create real opportunities for young people to grow and develop healthy, for them to have an educational opportunity that allows them to grow and reach their full potential. But it also has to give parents a sense of safety and value that when they are no longer around that their children are not going to have to fight and re-litigate the same issues that we have fought for decades.</p> <p>It would be inappropriate for the resources to go to someone else who has not withstood, not endured poor air quality, lack of affordable housing, lack of job opportunities and minimized and marginalized educational opportunities.</p> <p>It would be wrong not to invest where there is the greatest need.</p>

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<p>123</p>	<p>(CityFresno; 0054-5) I think someone mentioned we don't have as many people living in Downtown [Fresno]. I support Downtown. I want people to come Downtown. But we need to make sure that we're creating those policies that are going to bring everyone. That it's just not bringing folks from the higher incomes, but that we're also looking, so that lower income folks can also have the opportunities for these same types of benefits that will come from these types of investments.</p>
<p>124</p>	<p>(FresnoBHC; 0060-4) Not only does it cut our life spans by more than 20 years in South Fresno compared to our North Fresno counterparts, but it's actually killing our babies. And in fact 15 percent of black infants here die in their first year, but African-Americans are only 5.3 of our total population. And that was actually a research that was published just last year, in 2015.</p>
<p>125</p>	<p>(Ms. Villasenor; 0051-1) I would like to see Fresno focus in trying to help [residents in southeast Fresno], and try to refocus on giving us better lighting, better sidewalks, areas for our kids to ride their bikes, to make our community better. I would like to see that recycling center actually be replaced by a church, because our church is pretty far from where we live. And other than that, I would like to continue seeing improvements.</p>
<p>126</p>	<p>(Asm. Arambula; 0044-4) We have to invest in the infrastructure and guts of our city [Fresno].</p>
<p>127</p>	<p>(SJVHF; 0053-2) As the public process continues to go forward, I think it's incredibly important to continue to bring forward the voices and perspectives of Spanish speakers, of the Hmong community, of so many other folks that are represented. And that have not seen investments happening in their community. The communities that we work alongside do not live in the Downtown core. While it is wonderful to provide investments in the Downtown core, let's remember our farm workers are the lowest wagers that are living in the southeast and southwest.</p>
<p>128</p>	<p>(CityFresno; 0054-4)</p>

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	<p>I hope [access to economic opportunity] is to those people that live in the southwest and southeast [Fresno] that are very burdened by a lot of these environmental justice issues.</p>
	<p><u>Response to Comments 114-128</u></p> <p>These comments suggest that Program funds be used in specific locations within the cities designated in the proposed regulation. As explained in the Initial Statement of Reasons, the Council will develop Program Guidelines, including selection criteria, in a future, public process. Because these comments address specific Program implementation that does not involve the scope of this rulemaking, the Council declines to make any revisions to the proposal in response to these comments.</p>
<p>PROGRAM MUST PROVIDE TECHNICAL ASSISTANCE.</p>	
<p>129</p>	<p>(CEJA; 0023-6)</p> <p>Develop a quick and effective process to administer technical assistance (TA) dollars to under-resourced areas.</p> <p>SGC should consider the following lessons and best practices in providing TA from community groups:</p> <ul style="list-style-type: none"> ● Identify entities that have successfully served specific regions in the past to provide technical assistance to those regions. SGC should ensure that any groups providing TA in a region have on-the-ground regional expertise in the communities being served. ● Ensure TA is broadly available to a wide range of applicants and entities. ● Ensure TA is distributed equitably across geographic and capacity needs. SGC should consider capacity and scale of entities when making final decisions on who received TA. This can help ensure that TA support does not end up within heavily-resourced agencies. ● Establish a network of trusted experts that can provide assistance to different communities based on needs, including grant writers for those lacking development support, experts who can help with project design (e.g., engineers and economists), etc.
<p>130</p>	<p>(TPL; 0004-3)</p> <p>We recommend that a portion of TCC funds be directed to providing technical assistance within funded regions to ensure and incentivize robust local participation in the communities in which funding will be</p>

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	implemented.
	<p>Response to Comments 129-130:</p> <p>Public Resources Code Section 75242(b) provides that the Council “shall fund technical assistance providers to assist in application development and project development and implementation.” As explained in the Initial Statement of Reasons, the Council will develop Program Guidelines in a future, public process. Because these comments address specific Program implementation that does not involve the scope of this rulemaking, the Council declines to make any revisions to the proposal in response to these comments.</p>
	EDUCATE, HIRE AND ENGAGE LOCAL STAKEHOLDERS
131	<p>(Mr. Jaber; 0010-5)</p> <p>Please pay grassroots groups to do the community organizing around the planning, rather than consultants that aren't involved with the community. Consultants can have a role, but they shouldn't compete with what grassroots groups can do.</p>
132	<p>(CityFresno; 0052-2), (CityFresno; 0054-3), (WFresnoFRC; 0056-2)</p> <p>We really want to find a way to use these dollars for workforce development and connect people to jobs and opportunities that we see happening with high-speed rail. If we don't find a way to use these dollars in that manner I think we will have missed a big opportunity to really connect people, not just with sidewalks and transit and bike paths, which certainly we want to do that. But also to the job training and the skills upgrades needed to make sure they're connected to the economic opportunity that we trust and believe will be coming as a result of the high-speed rail investment.</p>
	<p><u>Response to Comments 131-132</u></p> <p>As explained in the Initial Statement of Reasons, the Council will develop Program Guidelines in a future, public process. Because these comments address specific Program implementation that does not involve the scope of this rulemaking, the Council declines to make any revisions to the proposal in response to these comments.</p>

Proposed Rulemaking for the Transformative Climate Communities Program