

January 3, 2011

Chairman Ken Alex Strategic Growth Council 1400 Tenth Street Sacramento, CA 95814

Re: Comments on the Strategic Growth Council's Draft Strategic Plan

Dear Chairman Alex and Members of the Council:

Thank you for your leadership in developing a strategic plan for the important work of the Strategic Growth Council over the next three years. For over 50 years, Greenbelt Alliance has worked to make the nine-county San Francisco Bay Area a better place to live through better city planning and protection of open space. We are keenly interested in the success of the Council.

### **Overall Comments**

Clarify Priorities: We recommend that the Council prioritize a few key programs and activities that will have maximum impact. The draft plan includes many programs and activities, some of which are broad and could be very resource-intensive. Due to the Council's limited resources, we suggest that the Plan should be more strategic about priorities, roles and responsibilities. It should limit involvement of Councilmembers and Executive Director in all but the most important priorities, identify which strategies are the top priorities, and fully delegate lower-priority activities to member agencies wherever possible.

**Secure Ongoing Funding:** The Plan should be explicit about the need to secure ongoing funding to support the Council's priorities, particularly the grant programs for local government. These grant programs have been the Council's greatest success to date, and they have made a substantial impact across California. The Council must be its own best advocate for ensuring these programs continue.

#### Comments on Specific Aspects of the Plan

Strategy 1.1: Coordinate across agencies the programs, activities, and funding which contribute to sustainability objectives.

The Council should fully embrace its mandate to coordinate funding distribution and infrastructure

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investments across agencies. In this era of limited resources, it is essential that California use its dollars strategically and effectively to achieve multiple goals. The Council can have a significant impact here.

Coordination of existing sustainability programs is useful. However, there are many state other programs and activities that are NOT designed to support sustainability objectives that nonetheless have a substantial impact on these objectives. Many programs are, in fact, actively undermining the goals of sustainability. The SGC should not simply coordinate existing sustainability programs and activities. It should examine all programs within member agencies that have an impact on sustainability objectives, evaluate their performance – positive or negative - and make recommendations for how they should be improved.

### Strategy 1.2: Identify policies and regulations that create barriers.

This is an excellent role for the Council to play. We recommend that this action include the identification and implementation of both administrative and legislative solutions to overcome these barriers. We strongly recommend that the review consider not just policies that discourage infill development, but also take a wider view and look at policies that encourage sprawl into natural and agricultural lands, and solutions to those challenges. In order to drill down into useful, actionable specifics, the Council should, as the plan suggests, analyze some case studies of projects which help to achieve multiple objectives, identify barriers, and present both administrative and legislative solutions. Two potential case studies include a mixed-use infill project that would meet sustainability objectives but faces challenges, and a sprawl project on natural lands that ran contrary to multiple Council objectives yet was easily approved and built.

# Strategy 1.3: Support California Technology Agency and the Governor's Office of Planning and Research in coordinating the State's geospatial data assets across agencies and departments.

We support this strategy. A region's natural systems (such as watersheds, forests, wetlands and habitat), parks and open space, farmland and ranchland provide the basis for clean water, clean air, healthy communities, food systems, recreational opportunities, climate resiliency and nature's biodiversity. Regional greenprints can use quality geospatial data to identify those important lands and waters that can be integrated into transportation land use plans. Incorporating conservation planning into infrastructure and land use scenarios reduces conflicts, provides an element of certainty for development and allows for more systematic economic growth.

### Strategy 1.4: Promote incorporation of SB 732's objectives into the state's Five-Year Infrastructure Plan.

We support this strategy to make the Five-Year Infrastructure Plan more focused on sustainability. The Council should fully embrace its mandate to coordinate funding distribution and infrastructure investments across agencies. In this era of limited resources, it is essential that California use its dollars strategically and effectively to achieve multiple goals. In addition, we believe that the Council



itself should discuss and provide feedback and specific direction on the draft Plan at appropriate points during the development of the plan.

## Strategy 2.8: Further the objectives of SB 375 through review, reporting and evaluation of Metropolitan Planning Organization (MPO) progress on their grant-funded projects.

We support these actions. As the agencies that control significant transportation funding and the implementers of SB 375, MPOs have an important role to play in implementing California's sustainability objectives. We support a thorough and public review of MPO actions taken to implement the grants from the SGC. Because these grants were explicitly directed to support SB 375 implementation, the links to Sustainable Communities Strategies are critical. We recommend that, when possible, these reviews should be timed to coincide with SCS development processes, in order to provide useful information for MPOs, stakeholders and local governments to inform these planning efforts in real time. The staff working groups assigned to review MPO reports should include a diversity of agency perspectives, especially those that complement the expertise at ARB. For example, experts in transportation planning and finance, affordable housing, economic forecasting, public health, environmental justice and natural resource conservation would all provide useful input to these reviews.

In addition to a report, we recommend the Council use the development of the Sustainable Communities Strategy as another opportunity to learn about the ways in which state policies and investments could be improved to result in greater outcomes, and invite the MPOs to present their plans and to offer their ideas for administrative and legislative solutions to facilitate implementation of the Sustainable Communities Strategies. The Council can then put their weight behind addressing these recommendations.

## Strategy 4: Recommend policies and investment strategies and priorities to the Governor, the Legislature, and to appropriate state agencies to encourage the development of sustainable communities.

Once barriers are identified and solutions developed, the Council should embrace and prioritize its mandate to recommend policies and investment strategies to the Governor and Legislature. An ideal, actionable goal for 2012 would be for the Council to identify a piece of legislation which all agencies can agree helps to move California in the direction of sustainability—for example, finding a suitable replacement mechanism for redevelopment —and put the full weight and authority of the Council behind this legislation.

In addition, the Council should weigh in to support new or renewed funding for programs such as the Sustainable Community Planning Grant and Incentive Program, and to ensure that new infrastructure funding proposals are consistent with sustainability objectives. To implement this strategy, we recommend that key staff coordinate with legislative staff in their agency to identify proposals which should be brought before the Council for discussion and possible action.



Thank you for your consideration of these comments. We look forward to working with you to implement the Strategic Plan over the next three years.

Sincerely,

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Jeremy Madsen, Executive Director