

**FY 2017-18 Discussion Draft SB 1 Sustainable Communities Grant Guide
Comment Log**

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Organization	Page/ Other Topic	Comments
Association of Monterey Bay Area Governments	9	<p>Sustainable Communities - Grant Specific Objectives</p> <p>Formula Funding MPOs should meet the following minimum eligibility criteria to apply for formula funding:</p> <ul style="list-style-type: none"> • Consolidated Planning Grant Carryover is at or below the 100% threshold; • Have an RTP SCS that meets the SB 375 greenhouse gas reduction targets; and, • Meet civil rights and environmental justice obligations, as summarized in Section 4.2 of the RTP Guidelines. <p>Can you please define/provide more information of what the threshold is for Consolidated Planning Grant (CPG) Carryover?</p>
Association of Monterey Bay Area Governments	16	<p>Local Match Contribution Can MPOs utilize toll credits for our SB 1 formula funding? Toll credits are allowed for FHWA PL formula funding.</p>
Association of Monterey Bay Area Governments	16	<p>Local Match Contribution Can MPOs utilize toll credits for our SB 1 competitive funding?</p>
Association of Monterey Bay Area Governments	17	<p>Pre-Award Audit Will MPO's be subject to a Pre-Award Audit if the formula funding is in excess of \$250,000?</p>
California Association of Councils of Government	1	<p>Distinction between "Facilitation" and "Influence" is Not Clear. The prohibition on MPOs and RTPAs "influencing" applicants "informally" is at odds with the facilitation role that is otherwise encouraged. In raising this point, we are not arguing for formal role in pre-screening. Instead, we agree that there should be collaboration and communication between applicants and regional agencies regarding the extent to which proposals are consistent with or enhance regional transportation choice and efficiency.</p> <p>But the current prohibition language is vague enough to chill otherwise the desirable communication to improve the quality of applications within a region. It is also inconsistent with the project selection criteria of determining how a proposal relates to a SCS (see top of page 3). As a result, the sentence prohibiting influence should be stricken.</p>
California Association of Councils of Government	9	<p>RTP SCS or Corresponding APS must meet SB 375 Targets. Eligibility for formula or competitive funding should be based on having a certified SCS or APS. We concur that an MPO should be challenged to meet an SB 375 reduction targets set by ARB. But even SB 375 acknowledges that there are times when it is infeasible to achieve the GHG reduction target within a fiscally-constrained SCS. In these instances, the MPO must develop an Alternative Planning Strategy (APS) for certification by ARB.</p> <p>Fortunately, SB 375 provides a model of how to award incentives using the SCS or APS alternative. For example, Public Resources Code Section 21159.28 (added by SB 375) provides that if a qualifying project is entitled to CEQA relief if it is consistent with "either a sustainable communities strategy or an alternative planning strategy for which the State Air Resources Board . . . has accepted the metropolitan planning organization's determination (that the SCS or APS would achieve the GHG target if implemented)."</p> <p>The Sustainable Planning Grant Program should follow the SB 375 model. To be eligible, the MPO must have either an SCS or APS that has been certified by ARB according to process set out in SB 375. In this context, we also believe it would be appropriate to add a further condition on those MPOs with an APS that the planning funds should be used in a manner that is consistent with the APS and further GHG reduction strategies. Such a condition is also consistent with the CEQA provision in SB 375, which conditions the CEQA streamlining on the conditions of the APS, not the SCS.</p> <p>This makes sense from a statewide policy perspective: regions that are having the most difficult achieving the target should be afforded similar resources to achieve the targets, or they will always be behind.</p>

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California Association of Councils of Government	11	<p>Ineligible Activities: Regional Transportation Plans</p> <p>An adjustment should be made to listing the Regional Transportation Plan as an “ineligible” activity for the formula funds. We perceive that the goal of this language is to avoid duplicating federal PL requirements. We even concur with that reasoning to the extent that it applies to the federally imposed requirements of the RTP. In other words, federal funds should be used to implement the federal requirements. Additional state funding should be used for state goals and objectives.</p> <p>The challenge with the language as written is that California MPOs must incorporate several additional requirements—like GHG emissions reduction, RHNA, and other practices incorporated into the RTP Guidelines—that go well beyond federal law. In addition, the exclusion of all RTP expenses is at odds with the following language in the Grant Program Considerations relating to the RTP Guidelines: The (RTP Guidelines) appendices highlight planning practices that are undertaken by large, medium, and small MPOs in both rural and urban areas throughout the State. The intent of additional Sustainable Communities grant funding, pursuant to The Road Repair and Accountability Act of 2017, is to encourage local and regional planning that furthers state goals, including but not limited to, the goals and best practices cited in the RTP Guidelines.</p> <p>This is a significant issue for smaller MPOs where the full share of the federal PL is less likely to cover the full costs of federally required planning and modeling and environmental review. Some clarity is needed. Perhaps a better approach would be to specifically reference the federally required elements of an RTP in the list of <u>ineligible activities</u>, and acknowledge that additional state-encouraged or required elements of an RTP are <u>eligible activities</u>.</p>
California Association of Councils of Government	12	<p>General Information and Requirement</p> <p>Given that the formula funds will be awarded and distributed through the OWP process, it appears that the section on General Information and Requirements on page 12 is specifically for the competitive program. However, this clarification is not specifically made, which creates ambiguity. The first sentence should read:</p> <p>This section provides a brief overview of the grant application review process, financial, contracting, subcontracting, and legal requirements pertaining to the <i>competitive</i> grant program.</p>
California State Association of Counties	9	<p>Competitive Funding</p> <p>In the draft guidelines, non-MPO jurisdictions are only eligible for funding under the statewide program. To encourage geographic equity, Caltrans should consider whether these non-MPO jurisdictions should receive special consideration over jurisdictions within MPOs under the statewide competitive funding program.</p>
California State Association of Counties	10	<p>Eligible Uses</p> <p>The language in SB 1 is broad as to the type of planning activities that can be supported, recognizing the link between land use and transportation. The guidelines also intend to give priority to jurisdictions with HCD-approved housing elements in recognition of the fundamental link between development patterns and land use policies on transportation. Despite this recognition, the guidelines seem to be focused on a narrow interpretation of transportation-related planning. For instance, the sole land-use focused example included in the list of “example sustainable communities grant project types” is “station area plans.”</p> <p>Many local jurisdictions need to update their general plans and specific elements within these plans, to promote consistency with sustainable communities strategies and adapt their local plans to reflect state regulatory changes, including implementation of SB 743. Accordingly, the guidelines and example projects should explicitly include general plan updates, circulation element updates, housing element updates, and any related specific plan updates, as eligible uses of funding. Within MPOs, any local land use plan that is being updated to better align with an SCS should explicitly be eligible. Outside of MPOs, any land use plan being updated to align with statewide planning goals should be eligible.</p>

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California State Association of Counties	12	Special Considerations & Page 5 – Disadvantaged Communities: The guidelines include a statement that a minimum threshold of 50% of sustainable communities grants is expected to benefit disadvantaged communities. The guidelines also recognize that there are a variety of metrics to define disadvantaged communities. Such considerations are warranted given that a substantial portion of the state, especially in areas outside of MPOs, communities with high poverty are not designated as disadvantaged pursuant to CalEnviroScreen. The guidelines should clarify that metrics in addition to those listed on page 5 can be used to designate disadvantaged communities, and that grant awards benefitting any such communities can count towards the desired 50% threshold.
California Transportation Commission	1	Sustainable Transportation Planning Grant Program First paragraph after Caltrans Mission statement, revise as follows: The California Legislature recently passed, and Governor Brown signed into law, Senate Bill 1 - The Road Repair and Accountability Act of 2017, a ten-year transportation funding bill that will...
California Transportation Commission	1	Sustainable Communities - Competitive Funding Sustainable Communities - Formula Funding Comment - The same name may lead to confusion. Most applicants want to focus on the competitive program.
California Transportation Commission	2	Sustainable Transportation Planning Grant Summary Chart Comment - Why is the local match amount the same as the federal requirement?
California Transportation Commission	3	Integrating Objectives & Considerations Successful grant applications address and articulate how the project relates to the Caltrans Mission, . . . Comment - Specify if this for the competitive or formula grants
California Transportation Commission	4	2017 RTP Guidelines & Promoting Sustainable Communities in California Comment - Insert reference to the RTP Guidelines for RTPAs
California Transportation Commission	4	2017 RTP Guidelines & Promoting Sustainable Communities in California Eligible rural agencies are strongly encouraged to apply for Sustainable Communities grants. Comment - Specify if this is for the competitive grants.
California Transportation Commission	4	Addressing Environmental Justice and Disadvantaged Communities Revise as follows: Caltrans strives for <i>supports</i> environmental justice in all of its activities.
California Transportation Commission	5	Addressing Environmental Justice and Disadvantaged Communities A minimum threshold of 50 percent of Sustainable Communities Grants has been identified for projects that benefit disadvantaged communities. Comment - Specify if this is for competitive or formula grants.

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California Transportation Commission	5	<p>Addressing Environmental Justice and Disadvantaged Communities Grant applicants are required to provide justification for how the project area meets their definition of a disadvantaged community.</p> <p>Comment - Specify how applicants will do this.</p>
California Transportation Commission	8	<p>Planning for Housing In order to receive special consideration, the grant applicant must submit to HCD the Annual Progress Report (APR) required by Government Code Section 65400 for calendar years 2013, 2014, 2015, and 2016.</p> <p>Comment - Specify how the special consideration will work in the process.</p>
California Transportation Commission	9	<p>Sustainable Communities – Grant Specific Objectives</p> <p>Competitive Funding Revise as follows:</p> <ul style="list-style-type: none"> • Align with MPOs SCS (<i>where applicable</i>) and other existing adopted plans (i.e. General Plans, specific plans, etc.)
California Transportation Commission	9	<p>Formula Funding</p> <p>Comment - Explain what happens to remaining funds if an MPO does not meet the minimum eligibility criteria.</p>
California Transportation Commission	9	<p>Formula Funding MPOs should meet the following minimum eligibility criteria to apply for formula funding:</p> <ul style="list-style-type: none"> • Meet civil rights and environmental justice obligations, as summarized in Section 4.2 of the RTP Guidelines. <p>Comment - How will this criterion be judged?</p>
California Transportation Commission	11	<p>Ineligible Activities and Expenses</p> <p>Comment - Define "decorations" and "unreasonable."</p>
California Transportation Commission	12	<p>Special Considerations Special consideration will be given to applications that . . .</p> <p>Comment - What does this mean?</p>

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City of San Jose	2	<p>We think the grant max for Cities should be at least \$1M. The July 2017 Discussion Draft does not make this distinction, but the 2017-2018 Grant Application Guide available at the link below does. http://www.dot.ca.gov/hq/tpp/grants/GrantGuideFY2017-18.pdf</p> <p>The City of San Jose’s Mobility Plan will be a strategic plan enabling the city to reach its ambitious mode change and VMT reduction goals. The City’s general plan sets a 40% single occupancy mode use goal and a 40% reduction from 2009 in VMT goal. Meet these goals will substantially reduce the environmental impacts of the transportation system in San Jose. For the City of San Jose to meet these goals by the plan horizon year of 2040 fundamental changes will need to be made to how transportation infrastructure is planned, designed, delivered, and maintained. The plan will be a substantial planning, technical and organizational design work effort.</p> <p>The City of San Jose’s Mobility Plan will consist of international benchmarking, model development and optimization, strategy development and organizational design elements. While the outcome of this work strongly aligns with the Sustainable intent of the Sustainable Communities Grant the maximum amount allowed in the grant is not enough for the City to accomplish its goals. The City of San Jose requests that the maximum grant amount be adjusted to at least \$1 million.</p>
ClimatePlan et al.	1	<p>Sustainable Transportation Planning Grant Program Comment - insert this sentence at the end of the first paragraph after the Caltrans Mission statement: This funding can also be used to improve public health, social equity, environmental justice, and provide other important community benefits.</p>
ClimatePlan et al.	1	<p>Sustainable Communities - Formula Funding \$12.5 million will be distributed to the MPOs on a formula basis. The formula funds for the MPO will reflect that same formula used to distribute Federal Highway Administration (FHWA) Metropolitan Planning PL funds. The FHWA PL formula has three components: 1. A two-part population component which distributes funds by the proportion of the total population of each MPO based on California Department of Finance estimates each January</p> <p>Comment - It would be helpful to explain what the two parts are.</p>
ClimatePlan et al.	2	<p>Sustainable Transportation Planning Grant Summary Chart The following are eligible to apply as a primary applicant: • MPOs with subapplicants</p> <p>Comment - Add footnote: MPOs funding shall be allowed to bundle applications on behalf of sub-applicants but shall not receive funding from this pool beyond the funding needed for administering such a grant.</p>
ClimatePlan et al.	3	<p>Grant Program Overarching Objectives Revise as follows: Sustainability – Promote reliable and efficient mobility for people, goods, and services, while meeting the State’s greenhouse gas emission reduction goals, <i>preserving the state’s natural and working lands</i>, and preserving the unique character of California’s communities.</p>

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ClimatePlan et al.	4	<p>2017 RTP Guidelines & Promoting Sustainable Communities in California Revise as follows: Successful applications must be compatible with an existing adopted SCS or Alternative Planning Strategy, where applicable, <i>that meets the region’s greenhouse gas targets</i>, and must strongly support and aim to implement regional SCS/APS efforts. The SCS/APS planning process is a tool that is intended to help communities reduce transportation related greenhouse gas emissions, coordinate land use and transportation planning, and assist local and regional governments in creating sustainable communities for residents throughout the State. Information on SCS-SB 375-related planning efforts can be found at...</p>
ClimatePlan et al.	5	<p>Addressing Environmental Justice and Disadvantaged Communities Revise as follows: Grant applicants are required to provide justification for how the project area meets their definition of a disadvantaged community. [INSERT REVISED DEFINITION OF DISADVANTAGED COMMUNITY HERE]</p>
ClimatePlan et al.	5	<p>California Health Disadvantage Index (HDI) Comment - We submit the inclusion of recommendations from Public Health Advocates SoCal with guidance for using HDI to identify DACs and potential scoring criteria/thresholds to use.</p>
ClimatePlan et al.	9	<p>Sustainable Communities – Grant Specific Objectives Competitive Funding Revise as follows: The grant specific objective of the Sustainable Communities grant program is to encourage local and regional multimodal transportation and land use planning that furthers the region’s SCS (where applicable), contributes to the State’s greenhouse gas reduction targets and other state goals, including but not limited to, the goals and best practices cited in the 2017 RTP Guidelines, <i>addressing historic underinvestments in and negative impacts to disadvantaged communities</i>, and also assist in achieving the Caltrans Mission and Grant Program Overarching Objectives on Page 3.</p>
ClimatePlan et al.	9	<p>Formula Funding Revise as follows: In addition, MPOs are strongly encouraged to administer Sustainable Communities Formula funding in a transparent manner <i>and shall maintain non-profit eligibility</i>, consistent with the legislative intent of Senate Bill 1...</p>
ClimatePlan et al.	9	<p>Formula Funding MPOs should meet the following minimum eligibility criteria to apply for formula funding: <ul style="list-style-type: none"> • Consolidated Planning Grant Carryover is at or below the 100% threshold; • Have an RTP SCS that meets the SB 375 greenhouse gas reduction targets; and, • Meet civil rights and environmental justice obligations, as summarized in Section 4.2 of the RTP Guidelines. • [PLEASE REVIEW LIST SUBMITTED IN LETTER DATED JULY 10] </p>
ClimatePlan et al.	9	<p>Formula Funding Revise as follows: If an MPO uses formula funds to administer a regional grant competitive program, the MPO must submit their grant program criteria <i>and list of eligible applicants and sub-applicants</i> to ensure it aligns with the Caltrans Sustainable Communities Grants.</p>

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ClimatePlan et al.	10	<p>Formula Funding The following funding table shows how formula funds will be distributed to each MPO.</p> <p>Comment - We recommend reviewing this to ensure that it funds small MPOs at a level that will allow them to meet basic needs for producing SCSs, such as maintaining travel models.</p>
ClimatePlan et al.	10	<p>Example Sustainable Communities Grant Project Types Revise as follows: Eligible project types include, but are not limited to:</p> <ul style="list-style-type: none"> • Active transportation plans, including bicycle, pedestrian and trail master plans • Bike and pedestrian plans with a safety enhancement focus, including Vision Zero plans • Health and transportation studies, including health equity transportation studies, health impact assessments and other plans that incorporate public health into transportation planning • Studies to improve access to social services and other community destinations for disadvantaged communities. • Social service improvement studies • Planning for autonomous vehicles
ClimatePlan et al.	11	<p>Eligible Activities and Expenses Add the following bullet:</p> <ul style="list-style-type: none"> • Community engagement, including mini-grants to CBOs and nonprofits to assist with outreach
ClimatePlan et al.	11	<p>Ineligible Activities and Expenses Revise as follows:</p> <ul style="list-style-type: none"> • Mandatory elements of Regional Transportation Plans (RTP) or required updates to the RTP, unless funds are being used to add a new element or conduct a study not previously included in an RTP
El Dorado County Transportation Commission	2	<p>Sustainable Transportation Planning Grant Summary Chart Is the grant maximum due to the fact that MPO's also receive formula funding? Explain the justification behind allowing MPO's to receive formula and competitive funding.</p>
El Dorado County Transportation Commission	3	<p>Integrating Objectives & Considerations Grant Program Considerations Placing EJ and DAC emphasis will hinder many of the rural counties ability to compete for much needed funding. These are requirements under ATP and should not be integrated in sustainable planning grant funding.</p>
El Dorado County Transportation Commission	5	<p>Addressing Environmental Justice & Disadvantaged Communities If DAC requirements are carried forward, it would be helpful for local jurisdictions to self-identify their respective DACs.</p>
El Dorado County Transportation Commission	12	<p>Special Considerations Not many rural counties will have the elements included in the "Special Considerations" listing of plans and policies.</p>

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Fresno Council of Governments	1	<p>Sustainable Transportation Planning Grant Program Sustainable Communities - Competitive Funding The Sustainable Communities Competitive Funding section states that “For an MPO or RTPA to influence the applicant pool either formally or informally by pre-screening applications is contrary to state administration of this grant program”. Sometimes pre-screening is needed when the MPOs receive application requests that are not consistent with the region’s SCS or other regional policies and the MPOs cannot support. In cases when MPOs receive multiple application requests that address the same issues, it is necessary for the MPO to choose the best application to support and forward to the State.</p>
Fresno Council of Governments	2	<p>Sustainable Transportation Planning Grant Summary Chart On the Sustainable Transportation Planning Grant Summary Chart, it lists that the MPO can be the primary applicant and the sub-applicant. Please clarify if the MPO can apply for the competitive funds without a sub-applicant?</p>
Fresno Council of Governments	9	<p>Sustainable Communities - Grant Specific Objectives Formula Funding One of the minimum eligibility criteria to apply for the formula funding is to “Have an RTP SCS that meets the SB 375 greenhouse gas reduction targets”; on page 4 under “2017 RTP Guidelines & Promoting Sustainable Communities in California”, it states that “successful applications must be compatible with an existing adopted SCS OR Alternative Planning Strategy, where applicable, and must strongly support to aim to implement regional SCS efforts.” Can Caltrans clarify whether a region is eligible for the formula grant if the region does not have an SCS that meets the targets and has an adopted APS?</p>
Fresno Council of Governments	9	<p>Sustainable Communities - Grant Specific Objectives Formula Funding Can the MPO choose to split their formula funds between a regional grant competitive program and discretionary? The competitive guidelines would be followed for the competitive portion, if the split is allowed.</p>
Local Government Commission	2	<ul style="list-style-type: none"> • Grant maximum of \$1,000,000 is too high for the Competitive grants. Suggest lowering maximum to \$500,000. • For Formula grants, the 11.45% match should be described as “regional match” not “local match” since, we assume, it’s coming from the MPO.
Local Government Commission	10	<ul style="list-style-type: none"> • Under “Grant Project Types” would be helpful if more details were provided for “Social Service Improvement studies” and for “Student internships for rural agencies and/or disadvantaged communities.” Not clear what those are about. • Add “AmeriCorps program members” to “Student internships” type
Local Government Commission	11	<ul style="list-style-type: none"> • First sentence, might want to clarify that “transportation nexus per Article XIX Sections 2 and 3” is referencing the California Constitution on Motor Vehicle Revenues • Under “Eligible Activities and Expenses,” second bullet, change to “Planning, design and engineering consultants”
Local Government Commission	12	<ul style="list-style-type: none"> • Under “Special Considerations” section. Delete “Vision Zero Plan” since that is a plan that jurisdictions might use these grants to prepare. Penalizing communities that don’t have one would hurt disadvantaged communities with fewer resources to prepare plans like this.

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Mendocino Council of Governments	1	<p>Sustainable Transportation Planning Grant Program "...Senate Bill 1 – The Road Repair and Accountability Act of 2017, a ten-year transportation funding bill..."</p> <p>Comment - It has been confirmed by Assembly Transportation Committee staff that this funding does not end in ten years.</p>
Mendocino Council of Governments	5	<p>Addressing Environmental Justice & Disadvantaged Communities Thank you for including alternate methods of determining "disadvantaged communities" beyond CalEnviroScreen!</p>
Merced County Association of Governments	9	<p>Under the "Formula Funding" section, we are opposed to the inclusion of two of the three listed minimum eligibility requirements for MPOs.</p> <ul style="list-style-type: none"> • "Consolidated Planning Grant Carryover is at or below the 100% threshold;" <p>This should have no bearing on the eligibility of these funds. Smaller MPOs, like ours, are struggling to resolve ICAP issues with the State in order to free up the carryover PL monies for appropriate expenditures.</p> <ul style="list-style-type: none"> • "Have an RTP SCS that meets the SB 375 greenhouse gas reduction targets;" <p>The objective/intent of these funds is to carry out activities to help achieve GHG reduction targets. That goal, as stated, should be sufficient without having to set the above requirement. If the proposed project does not work to achieve this goal, then that proposal is ineligible for the funds. Also, the list of example projects has been provided in the guidance to serve as reference.</p>
Metropolitan Transportation Commission	1	<p>Formula Program (Pages 1 and 9) MTC and ABAG appreciate the 50% formula component to the program- these dollars will help further the implementation of our SCS in local communities and on our congested corridors. We request further expansion and clarification of the formula program as follows:</p> <ul style="list-style-type: none"> • Consider an expansion of the formula program to 75% of the total program, to reflect that MPOs contribute a commensurate percentage of the state's population, economic output, and proposed greenhouse gas emission reductions. The MPOs are best positioned to identify the planning needs within their regions that advance the implementation of the RTP/SCS. • Clarify the process for applying for and using formula funds. We support the OWP amendment process and consultation with Caltrans District and Planning staff. As written, however, it appears that some of the grant application process included in the Grant Guides applies both to the formula and competitive programs. Maximum flexibility should be provided to the formula funds as long as the funds advance SCS implementation.
Metropolitan Transportation Commission	1	<p>Competitive Program (Pages 1 and 9) We also request modifications and clarifications to the competitive grant program as follows:</p> <ul style="list-style-type: none"> • Increase the maximum grant amount to \$2 million to help foster planning efforts supportive of CTP2040 at a larger geographical scale and encourage participation from multiple stakeholders. • Clarify the role of MPOs and RTP As in the facilitation of "a fair and open competitive application and outreach process." If our recommendation to expand the formula program to 75% is accepted, we recommend a very modest role for MPOs/RTPAs in the competitive program. Instead, we favor a strong role by Caltrans to select the most critical projects to advance statewide planning objectives. • Clarify whether MPOs require a subapplicant in order to be eligible as primary applicants for the competitive grants. We recommend maximum flexibility for applicants so the state can choose the projects that best advance statewide objectives. The focus should be on collaboration and coordination to further regional, inter-regional, and megaregional planning efforts and not overly prescriptive on applicant and subapplicant relationships.

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Metropolitan Transportation Commission	10	<p>Example Project Types and Eligible Activities (Pages 10-11)</p> <p>MTC and ABAG also recommend that example project types and the list of eligible and ineligible activities be modified to reflect the following priorities:</p> <ul style="list-style-type: none"> • The example project types should include model development, data analysis, and technical activities critical to support RTP/SCS implementation. For example, past state funds have encouraged the improvement of MPO land use and transportation modeling capacity in preparation for the SB 375 era. • Eligible activities should be expanded to include high-priority statewide and megaregional planning work including an emphasis on better and more consistent models/tools to help with SB743 implementation, identifying the needs of disadvantaged communities, planning and designing megaregional and statewide freight and passenger rail improvements, and economic forecasting and development across MPO boundaries - to name a few areas of strategic focus. • In the "Grant Program Considerations," please add a reference to the ARB Sustainable Freight Action Plan to encourage the inclusion of planning efforts focused freight impact reductions and zero or near-zero emissions technologies.
Orange County Transportation Authority	5	<p>“A minimum threshold of 50 percent of Sustainable Communities Grants has been identified for projects that benefit disadvantaged communities (DAC). As such, special consideration will be given to planning projects that benefit disadvantaged communities.”</p> <p>The DAC language was not in the legislation and OCTA recommends removing this requirement as it unfairly impacts agencies with limited DAC.</p> <ul style="list-style-type: none"> - The DAC requirements do not take into consideration of mobility and connections in and out of a DAC. Many services, places of employment, and amenities that serve residents of the DAC may be outside of a DAC boundary. Residents located in DACs travel to these areas. - As seen in the California Active Transportation Program (ATP), a disproportionate amount of funding was awarded to DACs (up to 90% - 100% per call for projects). Many qualified and financially limited agencies throughout the state no longer apply for ATP due to lack of awards to non-DAC agencies and this severely limits mobility and connection options throughout the transportation network. <p>If Caltrans uses the 50 percent DAC threshold, OCTA recommends that a 50% set aside should be made for DACs. The remaining 50% should be set aside to award to applications with no consideration to DACs. This would provide areas with limited DAC a better chance of competing in the program, provide connections to and from DAC and non-DAC areas, and enhance the transportation network.</p>
Placer County Transportation Planning Agency	5	<p>Fifth line beginning with “A minimum threshold of 50 percent of Sustainable Communities Grants has been identified for projects that benefit disadvantaged communities.” It is unclear whether the 50 percent of the Sustainable Communities Grants applies to both Formula and Competitive funding pots. Can the application of the 50 percent be clarified? Will specific scoring rubrics be developed for the grant application review? Additional clarity is needed.</p>
Placer County Transportation Planning Agency	8	<p>Last paragraph, “Beginning with Fiscal Year 2019-2020, Sustainable Communities grant applications will be required to have a compliant housing element in order to be eligible for sustainable communities grant awards.” Is this requirement in state law? Also, how would this requirement apply to MTPOs, RTPAs, Transit Districts or other entities applying for funding that have no land use control?</p>
Placer County Transportation Planning Agency	12	<p>Special Considerations section. Additional clarity is needed in this section to clearly identify how grant applications will be selected. How much weight does a compliant housing element or other elements/plans/policies carry? Also, how do these “special considerations” apply to MPOs, RTPAs, Transit Districts or other entities applying for funding that have no requirement or authority to develop these elements/plans/policies?</p>

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Public Health Alliance of Southern California	5	<p>California Health Disadvantage Index (HDI): http://phasocal.org/ca-HDI/</p> <p>The Public Health Alliance developed an interactive composite index to identify cumulative healthy places in California. The purpose of this Health Disadvantage Index (HDI) is to prioritize public and private investments, resources and programs. HDI includes diverse non-medical economic, social, political and environmental factors that influence physical and cognitive function, behavior and disease. These factors are often called health determinants or social determinants of health and form the root causes of disadvantage. Indicator data used for HDI comes from publicly available sources and is produced at a census tract level. HDI materials are freely available online for use by communities and public and private agencies.</p> <p><i>Strick-out text above and replace with:</i></p> <p>The California Health Disadvantage Index (HDI) is an interactive data and mapping tool that provides a detailed snapshot of the social determinants of health across California, mapped down to the Census tract level. HDI provides comparison rankings of Census tracts statewide and an accompanying policy action guide. Therefore, the HDI can be a useful tool in prioritizing areas with high levels of social and economic disadvantage for funding, policy, and planning interventions. HDI was developed by the Public Health Alliance of Southern California in collaboration with health departments and data experts across the state. Because the HDI focuses on the social and environmental conditions that contribute to health, policy makers and local agencies can use it to identify actionable policies that would improve health in their community, such as improving transportation access, housing affordability and quality, or access to parks and open space. The tool will soon be updated with a new map and additional indicators, and will be renamed the California Healthy Places Index (HPI).</p>
Public Health Alliance of Southern California	5	<p>California Health Disadvantage Index (HDI)</p> <p>Insert the following: <u>Understanding the HDI Score</u></p> <p>The HDI includes a composite score for each Census tract in the State. The higher the score, the greater the disadvantages to health. Each Census tract's score is converted to a percentile, which allows it to be compared to other California Census tracts. For example, an HDI percentile of 79 indicates that a Census tract would face more cumulative social challenges to health than 79% of the Census tracts in California. HDI percentile rankings are further broken into quartiles, with percentiles above 75 typically used to indicate disadvantaged communities. Thus, higher scores can be used to demonstrate a community, or project/service area, is disadvantaged for purposes of qualifying for the set-aside in this program.</p> <p>HDI Percentile</p> <ul style="list-style-type: none"> • 76-100: most disadvantaged • 51-75 • 26-50 • 0-25: least disadvantaged <p>In addition to the composite score and percentile ranking, applicants can review the individual domain scores or indicators themselves and explain how their project will improve one or more of these public health challenges. The numeric value and percentile ranking for these component indicators can be found either by using the live map or by accessing the data directly.</p> <p>Include example table provided above and this additional statement: "For more information on the HDI, including how to calculate a score for your project area and suggested project types for improving public health, visit http://phasocal.org/ca-HDI/."</p>

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Rails-to-Trails Conservancy	2	<p>Summary Chart We suggest reducing the maximum grant size for the competitive grants from \$1 million to \$500,000 so the grants can serve more communities. The grant size is also referenced on page 17 under Pre Award Audit.</p>
Rails-to-Trails Conservancy	4	<p>Addressing EJ and DACs We applaud the substantial set-aside for disadvantaged communities (DACs). We assume the program also intends to support the broad range of communities working to advance sustainable planning objectives, and provide a reasonable chance to compete for funding. We suggest clarifying the intent that 50% of the program is guaranteed to DACs, and 50% will be open to all communities based on the merits of their application. As such, we recommend modifying the language in the paragraph at the top of pg 5 as follows: <i>Supporting planning projects that benefit disadvantaged communities is a priority; therefore a minimum threshold of 50 percent of Sustainable Communities Grants has been identified for projects that benefit disadvantaged communities.</i></p>
Rails-to-Trails Conservancy	9	<p>Competitive Funding We suggest broadening the second bullet to read: <ul style="list-style-type: none"> Identify and address mobility, <i>connectivity and safety</i> deficiencies in the multimodal transportation system including the mobility needs of environmental justice and disadvantaged communities, <i>and vulnerable users, especially bicyclists and pedestrians</i> ; </p>
Rails-to-Trails Conservancy	10	<p>Examples of Grant Project Types In the eighth bullet, we suggest you make this more inclusive by modifying the language as follows: <ul style="list-style-type: none"> <i>Bicycle, pedestrian, active transportation or trail plans, including safety enhancement plans</i> </p>
Rails-to-Trails Conservancy	12	<p>Special Considerations Consistent with our comment re pg 5 above, we suggest modifying the second sentence as follows: <i>A minimum threshold of 50 percent of Sustainable Communities Grants is anticipated to benefit disadvantaged communities. In addition, special consideration will go to jurisdictions that have or are preparing the following elements/plans/policies:</i></p> <ul style="list-style-type: none"> Compliant housing element as outlined on Page 7 Environmental Justice Element in compliance with Senate Bill 1000 (Leyva, Statutes of 2016) upon making significant changes to the General Plan Vision Zero Plan Complete Streets Policy Anti-displacement Strategy Climate Action Plan <i>Comprehensive Pedestrian and Bicycle Plan</i>
Rails-to-Trails Conservancy	General	<p>On behalf of all the undersigned organizations, we appreciate the opportunity to comment, and commend you for the thoroughness and thoughtfulness that clearly went into this initial draft. We want to thank you in particular for:</p> <ul style="list-style-type: none"> Emphasizing climate goals throughout the document and providing incentives for communities to advance Vision Zero and Complete Streets policies; Retaining eligibility for non-profits to be co-applicants; Addressing equity and environmental justice by guaranteeing 50% of the funds for disadvantaged communities, and allowing for some flexibility in the definition to fit needs of different regions of the state.

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Sacramento Area Council of Governments	1	<p>Formula Grant Program (Pages 1 and 9) SACOG appreciates the proposal to offer a formula component to the program. Guaranteed funding will help us plan ahead work program activities that implement our local and regional plans. We recommend the following clarifications and refinements:</p> <ul style="list-style-type: none"> • Consider an increase in the share of the formula funds to be 75% of the total program. Integrated planning responsibilities for MPOs and RTPAs, such as SACOG, have steadily increased over time. With policy boards that bring together elected officials from local governments, our agencies are best positioned to identify the planning needs within our regions that advance the implementation of local plans and our regional RTP and SCS plans. Also, the convening roles regional agencies take on can lead to efficiencies in the coordination and execution of planning and analysis work activities. • Clarify the process for budgeting formula funds in the OWP. The grant guidelines are not completely clear as to what steps in the grant application process apply to the formula and/or the competitive programs. For work to commence in January 2018, it would be helpful to have the process flexible and streamlined as long as the work activities are deemed eligible through the consultation with Caltrans staff.
Sacramento Area Council of Governments	1	<p>Competitive Grant Program (Pages 1 and 9) SACOG also recommends modifications and clarifications to the competitive grant program:</p> <ul style="list-style-type: none"> • Clarify the role of MPOs and RTPAs in the facilitation of "a fair and open competitive application and outreach process." SACOG supports a strong project selection role by Caltrans on the proposed 25% share that would go towards a competitive grant program to advance statewide planning priorities. In prior cycles, SACOG took an active role in working with local agencies. Technical assistance efforts included reviewing and providing suggestions for strengthening initial concepts and final applications, suggesting partnerships, and providing support letters. Applicants in our region have expressed appreciation for SACOG's assistance so we want to make sure future assistance efforts are deliberate and align with the objectives Caltrans has for the new planning grant programs. As such, it would be helpful to have the MPO and RTPA technical support and involvement role clarified in the next iteration of the guidelines. • Clarify the relationship between grant program considerations and grant specific objectives. It is unclear if a proposal would not score as well because it did not integrate every grant program consideration on page 3, nor is it clear as to how the grant considerations will be evaluated. • Consider a flexible approach in evaluating how the 50% minimum threshold for disadvantaged community benefits can be met. It's not clear if the threshold will be met through targeting a geographic location, or whether a planning effort not targeting a specific geography can demonstrate benefits to a disadvantaged community. Many of our member agencies have raised concerns with target geography requirements and the increasing thresholds being used in state programs for disadvantaged communities due to the funding constraints they face for completing planning priorities. • Clarify how the completion of related planning efforts will be evaluated as a "special consideration." It would be helpful to provide more clarity on what the different "special considerations" mean and how they would be applied and scored. Six different items are listed as receiving special consideration, but it is not clear whether each item will receive an additional score, or whether meeting one provides the applicant with "special consideration." It is also unclear how these special considerations would apply to a lead applicant that is an MPO, RTPA, transit agency, or Native American Tribal Government, and not a city or county with general plan and land use authority, and responsibility for most of the named plans/policies.

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Sacramento Area Council of Governments	11	<p>Eligible Activities SACOG recommends that the eligible activities be expanded to include the various technical and public engagement activities that support SB 375 implementation efforts at the mega-region scale. Examples of value include: shared data and technical analysis tools, mega-region freight and passenger rail plans, and the development of economic development strategies that also offer affordable housing and environmental benefits.</p>
Sacramento Area Council of Governments	12	<p>Specific comments on the identified plans or policies that are mentioned in the "special consideration" section:</p> <ul style="list-style-type: none"> o Vision Zero Plan -Vision Zero is a particular approach to planning for safety. Many communities may have a safety plan or engage in safety planning work but it is not specifically labeled "Vision Zero." If special consideration is considered warranted, a more generic reference to safety planning seems more appropriate than such a specific reference. o Anti-displacement strategy - Some transportation investments may ultimately have the consequence of helping to gentrify neighborhoods, but many do not, or are in communities where displacement is not an issue. We suggest it makes more sense to require the applicant to address potential gentrification impacts of their study or plan as part of their application, rather than providing a blanket special consideration. o Climate Action Plan -Many small agencies have not had the resources to develop a specific climate action plan, and they are suggested but not required under current general plan guidelines. This consideration seems to have the potential for disadvantaging applicant jurisdictions with fewer resources.
San Diego Association of Governments	1	<p>SANDAG seeks clarification regarding the role of the Metropolitan Planning Organization (MPO) and Regional Transportation Planning Agency (RTPA) in the competitive portion of the Sustainable Transportation Planning Grant Program.</p> <p>The draft guidelines state that "the role of MPOs and RTPAs is to facilitate a fair and open competitive application and outreach process. For an MPO or RTPA to influence the applicant pool either formally or informally by pre-screening applications is contrary to state administration of this grant program."</p> <p>Will the MPO/RTPA be responsible for facilitating a regional application process? If so, what will this entail and will funding be provided to the MPO/RTPA to support this effort?</p>