



April 7, 2017

Mr. Ken Alex, Chair
 Strategic Growth Council
 10th Street
 Sacramento, CA 95814

RE: 2017-18 Revised AHSC Guidelines Related to Urban Greening

Dear Mr. Alex:

We are pleased to offer comments on the proposed revisions to the 2017-18 Affordable Housing and Sustainable Communities Grant Program as it relates to urban greening criteria. Many groups represented on this letter may have additional comments on other components of the Program that will be submitted under separate cover.

We wholeheartedly support the proposed revision that incorporates urban greening as a threshold requirement for any AHSC-funded project. This single revision to the Program shifts the dynamic of affordable housing and transit-oriented development in a way that bridges a long-standing divide between grey infrastructure and green infrastructure. Numerous peer-reviewed studies and data gathered around the world have demonstrated that urban forests, greenscaped trails and bicycle paths,

local parks, open space, and other natural resource investments in our urban and exurban communities provide a wide array of social, recreational, public health, environmental, climate, and economic benefits that attract local businesses, promote active transportation, and improve quality of life. This is especially pertinent to the AHSC Program, given the tremendous and appropriate focus on benefitting disadvantaged communities, which are consistently ranked as the most park-poor, under-resourced areas in the state. Furthermore, this requirement adds no outside cost to the applicant, as urban greening is already an eligible cost under the Program.

In order to ensure authentic urban greening is incorporated into every project proposal utilizing natural green infrastructure as a core component, we also support two minor modifications to the Guidelines as follows:

1. Redefine “Urban Greening.”

The current definition that appears in the Guidelines Appendix is clearly well-intentioned, but provides unnecessary “wobble room” for applicants that may try to satisfy this threshold requirement by painting a roof white or constructing a pedestrian trail system without appropriate canopy cover or greenscape. Further, the definition inadvertently omits “natural infrastructure,” which is a new term defined in the Appendix and a tool we fully support. Therefore, we propose the following definition to clarify both of these points:

“Urban Greening” means the incorporation of *greenscaped* pedestrian and bicycle trail systems, urban street canopy, *green alleys*, drought tolerant and native species landscaping and landscape restoration, green ~~and cool~~ roofing, community gardens, natural infrastructure, and stormwater features into public open spaces.

2. Clarify the urban greening threshold requirement on Page 17.

While the revised Guidelines do specify “the AHSC funded components of the Project must incorporate Urban Greening,” this requirement is mentioned only once in the entire document with no further explanation provided. Given the significance of this proposed revision, we would encourage the SGC to augment this sentence with language from last year’s Guidelines and highlight it to ensure all applicants are explicitly aware of this requirement, as follows:

The AHSC-funded components of the Project must incorporate Urban Greening as defined in the Appendix and may include native California vegetation, drought tolerant plants and trees, or bioswales along an active transportation route, transit corridor, open space, or park. A minimum of two years of initial maintenance costs to establish vegetation should be included in the Project.

The incorporation of urban greening as a threshold requirement into the proposed Guidelines represents a bold leap forward for the Strategic Growth Council in its charge to “promote sustainability, economic prosperity, and quality of life for all Californians.” This revision will set a precedent for other state-funded programs that follow and will further the Council’s long-term goal of ensuring that the build-design process includes green infrastructure from the onset.

We applaud the SGC for its vision on this important issue and appreciate the opportunity to comment.

Sincerely,

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The Nature Conservancy

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Trust for Public Land

Chuck Mills
California ReLeaf

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Your Children's Trees

Juan Altamirano
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José G. González
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Gloria Ohland
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John Bushoven
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From Lot to Spot

Isabel Wade
Just One tree

Gail Church
Tree Musketeers

David Wilkinson
Woodland Tree Foundation

Doug Wildman
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Catherine Martineau
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Jean Nagy
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Lani Houck
Roseville Urban Forest Foundation

Darleen DeMason
Victoria Avenue Forever

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Maria Sutherland
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Mike Palat
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Claire Robinson
Amigos de los Rios

Rosa Rivera Furumoto
Parent Pioneers/Padres Pioneros

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Melissa Iger
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Janice Mignone
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