

4. the number of units that are in substandard condition;
5. the number of households paying more than 30 percent of their income toward housing; and
6. the number of households in overcrowded housing.

The detail required in the bill is not consistent with the rest of General Plan law and would require extensive staff time and funding to provide. The bill also requires both cities and counties to address these communities, resulting in overlapping and redundant General Plan analysis and mitigation for the same communities.

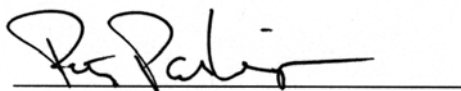
Other implementation roadblocks include the fact that sidewalks and other services listed in the bill are amenities that many local communities and counties do not want. Some of these issues are problems on every street in California – street lighting and high housing costs for example. And there is a patchwork of special districts that govern existing infrastructure in many of these communities, making it difficult to coordinate changes.

Most recently, cities and counties have begun using community plans rather than the General Plan to address disadvantaged communities, using community-based planning to address residents' wants and needs, determining which are the areas and infrastructure most in need, and then addressing these areas as funding becomes available. But, this bill includes a definition of "substandard" that is not prioritized and is so broad funding will not be available in any foreseeable future.

Cities and counties would replace substandard infrastructure in disadvantaged communities if monies were available, but often times funding options are limited. Even if the bill were narrowed in scope to deal with only water and sewer infrastructure, without funding, the bill simply isn't feasible for many jurisdictions to accomplish particularly with the downturn in the economy. However, our associations believe that addressing the needs of disadvantaged communities through the planning process and finding tools to support the infrastructure deficiencies remain very important and worthy of continued discussion to determine what remedies might be feasible.

If you have questions, please contact APA California's lobbyist, Sande George with Stefan/George Associates, 916.443.5301 or sgeorge@stefangeorge.com, or any of the representatives below.

Sincerely,



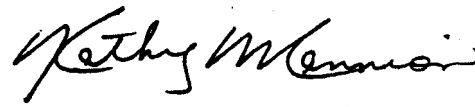
Pete Parkinson, AICP
Vice President Policy and Legislation
APA California
PPARKINS@sonoma-county.org



DeAnn Baker
Senior Legislative Representative
CSAC
dbaker@counties.org



Bill Higgins
Legislative Representative
League of California Cities
higginsb@cacities.org



Kathy Mannion
Legislative Advocate
RCRC
kmannion@rcrcnet.org

cc: Senate Local Government Committee