



Building Industry Association of Southern California, Inc.

Greenprint Survey Response
Southern California Association of Governments
900 Wilshire Blvd., Suite 1700
Los Angeles, CA 90017

Re: SoCal Greenprint Themes and Data Survey

On behalf of the Building Industry Association of Southern California (BIASC), thank you for the opportunity to continue our conversation on the SoCal Greenprint. Our concerns with the Themes and Data proposed for the SoCal Greenprint span generally across all data sets and in an effort to reduce repetitive survey submissions, we submit the following comment:

- 1. Require Transparency.** The planned content of Greenprint must be fully disclosed, inclusive of all “factors” chosen to “map” what SCAG’s Greenprint team has concluded is a “constraint” on development in the region, along with the agency, academic, NGO, or other “open source” which developed either the factor, the mapping criteria to measure the factor, or the actual maps that apply each factor. On July 28, 2021 an email was sent that offered the first disclosure of the proposed data list that will be used to create the SoCal Greenprint’s interactive maps. This was an important first step that must be continued, in real time, as changes are made to data points proposed for inclusion within the SoCal Greenprint.
- 2. Require Accountability.** As stated on the SoCal Greenprint website, once developed, the SoCal Greenprint will be an “online mapping tool to help stakeholders prioritize lands for growth and conservation based on the best available scientific data.” The July 28th Proposed Data Layer List includes multiple sources that offer data from private organizations and/or data that has not been peer reviewed or credibly vetted, preventing it from being called scientific data. Inclusion of such data sets in the SoCal Greenprint impart the credibility of the SCAG organization to it and as such, create significant new information that can be used in CEQA challenges. To avoid this concern, all data points included in the SoCal Greenprint must, at a minimum, be from official Government sources.
- 3. Right-Size Scope.** Unless otherwise directed by Regional Council Resolution, “Greenprint” shall be applied only to lands designated for open space or agricultural uses in local General Plans, excluding such lands for which transportation projects have been included in the SCAG Regional Transportation Plan (2020). The proposed boundaries of “Greenprint” mapping shall be disclosed within 30 days of the Regional Council direction, and the full draft content of Greenprint shall be disclosed no later than 60 days prior to Regional Council action to approve the final version of Greenprint for its use, as required by Connect SoCal’s Program EIR Agricultural and Biological Resource Mitigation Measures, to identify which of the open space and agricultural lands designated in locally-approved General Plans can also provide agricultural and biological resource mitigation for implementation of the Regional Transportation Plan, and local General Plans.