

August 13, 2021

Mr. Kome Ajise  
Executive Director  
Southern California Association of Governments  
900 Wilshire Blvd., Suite 1700  
Los Angeles, CA 90017

**RE: SoCal Greenprint Comments**

Dear Executive Director Ajise,

Orange County Business Council (OCBC), the leading voice of business in Orange County, appreciates the opportunity to comment on the development of the SoCal Greenprint. OCBC thanks the Regional Council for responding to feedback from experts in the business and development community and other key stakeholders in Southern California and allowing for additional time to review the Greenprint and provide feedback to SCAG. Amendments are needed to ensure the Greenprint is a successful land use tool without hindering housing production.

As you know, Southern California is suffering from a housing crisis. OCBC's "[2019-20 Workforce Housing Scorecard](#)" found that Orange County has an existing shortfall of 58,000 units. This shortfall will likely grow to over 114,000 units unless housing production can meet new job growth and population growth. Given the severity of the region's housing needs, it is crucial that new obstacles to housing production are not introduced—whether intentional or unintentional.

The Greenprint is described as a "strategic conservation mapping tool" to "protect, restore, and enhance natural lands, public greenspace, working lands, and water resources." While OCBC supports this goal, it must be balanced with the SCAG region's dire housing needs. As currently drafted, Greenprint's Proposed Data Layer List includes multiple data sources that lack the credibility to be considered scientific, yet by adding them to Greenprint, they could be seen as more legitimate than they are. As expressed from multiple speakers who are experts in this field during SCAG's Regional Council meeting on July 1, 2021, this data could be used in California Environmental Quality Act (CEQA) litigation resulting in detrimental, unintended consequences for housing or transportation projects. CEQA litigation abuse is already significant roadblocks for developers; adding another way for housing opponents to bolster CEQA lawsuits by citing the Greenprint's data as scientific would be counterproductive to SCAG's Regional Housing Needs Assessment (RHNA) and the region's holistic housing efforts. Instead, OCBC recommends SCAG only include data from official government sources in the Greenprint. OCBC also urges SCAG to continue notifying all stakeholders of all changes to data, maps and constraints within the Greenprint and their sources in real time. OCBC supports these and other recommendations provided by the building industry and encourages SCAG to continue working with Orange County stakeholders to ensure our shared goals for housing, transportation, and sustainability are mutually achievable.

Thank you for your consideration and we look forward to revising the Greenprint further to create a tool that has the support of housing, business, transportation, conservation and local government stakeholders.

Sincerely,



Jennifer Ward  
Senior Vice President of Advocacy and Government Affairs