

**Construction Industry Air Quality Coalition
Comments on SCAG GreenPrint Program
Michael Lewis
August 24, 2021**

I want to express our serious concerns about the construction of the GreenPrint data and its ultimate use.

A great deal of land is held in this region as AG land. It is not used for that purpose, but it becomes a holding zone for land until it is acquired for other uses designated and consistent with community and general plans.

Applying layer, upon layer, upon layer of limitations is not going to help us meet our housing, employment, transportation, or open space goals.

Trying to apply it to some properties and not others is not a realistic application of the data and that is not how it will ultimately be used despite SCAG's disclaimers.

These layers of data are weaponizing the land use process to impede any alternative use of these lands. That will be the real effect of this exercise and it is the goal of some of the advocates.

Shouldn't this data have to meet some minimal test for accuracy or veracity?

Shouldn't there have been some peer review?

Shouldn't it have been subjected to some public review and vetting process?

Accepting raw data from a reasonably biased source is not a sustainable planning process.

Applying these limitations and burdens, and that is what they are—not one of these layers represents an opportunity—to private property without the owner's knowledge or opportunity to refute the accuracy seems entirely unfair and well beyond the scope of SCAG's authority and responsibility.

It also tramples all over the rights of property owners.

Everyone of these layers was created by someone for a specific purpose. Not one of those purposes was more housing, more jobs, more mobility or more recreation.

Where are the priorities in this effort?

Shouldn't all this data be weighted and counterbalanced with the needs of the region?

Elevating the wants of a few special interests without considering the needs of the region and its residents is not providing a useful service or tool for policy makers.

I hope you'll pause this effort and let's step back to the purpose for this effort and craft some objectives that will help the region meet all its goals; not just the narrow objectives of a small group of advocacy organizations looking for a hammer to use in their pursuit of limiting development throughout the region.