

Regional Advance Mitigation Program – Advisory Task Group (RAMP-ATG)

List of Public Comments

Received before 5pm on Monday, April 25, 2022

	Date Received	Sender Name	Organization	Subject Matter
1.	4/25/2022	Richard J. Lambros	Southern California Leadership Council	Business Coalition List of Primary Concerns with RAMP Policy Framework (04-22-22)

From: Richard Lambros <rlambros@southerncaliforniagroup.com>
Sent: Monday, April 25, 2022 11:25 AM
To: SCAG Green Region
Cc: Kome Ajise; Darin Chidsey; Sarah J. Jepson
Subject: Business Coalition - Shortlist of Concerns Regarding the Draft RAMP Policy Framework
Attachments: Business Coalition List of Primary Concerns with RAMP Policy Framework (04-22-22).pdf

Kome and Greenprint Team,

The Southern California Business Coalition, made up of approximately 30 key regional and statewide business organizations, has three primary concerns with the draft of the proposed RAMP Policy Framework, which are attached. Thank you for your consideration of these in advance of tomorrow's meeting of the RAMP ATG.

Best,
Rich

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Southern California Business Coalition

Primary Concerns with the RAMP Policy Framework

The Southern California Business Coalition, made up of approximately 30 key regional and statewide business organizations, has three primary concerns with the draft of the proposed RAMP Policy Framework, which are as follows:

- 1. As a threshold issue, we need all remaining references to Greenprint removed from the RAMP Policy Framework.**
 - a. While much of the Greenprint language has been removed, there are still far too many references which create confusion between these two separate projects.
 - b. Of particular concern is the continued inclusion of and focus throughout the draft RAMP Policy Framework on “best available science”. Because this term related so obviously to the controversial Greenprint and has important meaning under CEQA (and thus potentially in litigation), it too should be removed from the RAMP Policy Framework and saved for the discussion about the Greenprint.

- 2. All of the draft RAMP Policy Framework’s references to “best available science,” data sets and Greenprint need to instead be reserved for a new technical advisory committee (TAC) for proper development and refinement.** Moreover, this new TAC should not begin its work until it has received macro policy direction (including core principles and guidelines) from the Regional Council.

- 3. Our Coalition strongly urges the RAMP ATG to delay final adoption of the proposed RAMP Policy Framework, and allow for a minimum of thirty days for additional review and refinement.**
 - a. Even if SCAG were to accede to our threshold requests above, the resulting RAMP Policy Framework would still warrant discussion about many other policy concerns.
 - b. Our Business Coalition also is concerned that the RAMP ATG is rushing to adopt the RAMP Policy Framework and White Paper precipitously, even though these final draft documents have only been available for public review (and ATG review) for just a few days – not weeks. We believe this request is most reasonable given that these documents are being presented as the culmination of the ATG’s work, and the members of the ATG themselves have repeatedly said that they will take as much time as necessary to complete their work in order to “get it right.”