

**Regional Council (RC) and Energy and Environment Committee (EEC)**

**List of Public Comments**

Received after 5pm on Wednesday, October 6, 2021

|    | <b>Date Received</b> | <b>Signatory Name</b>   | <b>Organization</b>  | <b>Agenda Item (AI #)</b>   | <b>Subject Matter</b>   |
|----|----------------------|---|--|-----------------------------|---|
| 1. | 10/06/2021           | Hank Fung   | City of Covina   | RC AI #1 - SoCal Greenprint | Support for Greenprint to help plan for a healthier and more sustainable region |
| 2. | 10/06/2021           | Charles Thomas  | Outward Bound Adventures   | RC AI #1 - SoCal Greenprint | Support for Greenprint as mandated mitigation measure                           |
| 3. | 10/6/2021            | Richard Lambros, Tracy Hernandez, Lucy Dunn, Paul Granillo, Maria Salinas, Jon Switalski, Ray Baca, Dexter McLeod, Fabian Naranjo Gonzalez, Ivan Volschenk, Mario Rodriguez, Jeremy Harris, Donna Duperron, Barbara Thomas, Louise Lampara, Mike Lewis, Timothy Jemal, Carolyn Cavecche | Southern California Leadership Council, Los Angeles County Business Federation, Orange County Business Council, Inland Empire Economic Partnership, Los Angeles Area Chamber of Commerce, Rebuild SoCal Partnership, Engineering Contractors' Association, Los Angeles South Chamber of Commerce, San Gabriel Valley Economic Partnership, Santa Clarita Valley Chamber of Commerce, Hispanic 100, Long Beach Area Chamber of Commerce, Torrance Area Chamber of Commerce, South Orange County Economic Coalition, Ventura County Coalition of Labor, Agriculture and Business, Construction Industry Air Quality Coalition and Construction Industry Coalition on Water Quality, NAIOP SoCal, Orange County Taxpayers Association | RC AI #1 - SoCal Greenprint | Concerns about the Greenprint datasets, process, and lack of white paper        |

|    |         |             |  |                             |  |
|----|---------|-------------|--|-----------------------------|--|
| 4. | 10/7/21 | Will Wright | American Institute of Architects – Los Angeles Chapter | RC AI #1 - SoCal Greenprint | Support for Greenprint as important resource for smart planning decisions; request to move the project forward |
|----|---------|-------------|--|-----------------------------|--|

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-----Original Message-----

From: Hank Fung [REDACTED]  
Sent: Wednesday, October 6, 2021 5:02 PM  
To: ePublic Comment Group <ePublicComment@scag.ca.gov>  
Subject: Regional Council meeting public comment

Dear members of the SCAG Regional Council,

On item 1, I urge the Regional Council to approve the staff recommendation to continue with the Greenprint, as a mandated mitigation item in the Regional Transportation Plan Program Environmental Impact Report. This is an important tool to combine existing publicly available information, vetted by SCAG staff for relevance and reliability, into an integrated geographic information system for planning and development. It is unfortunate that the motives of our region's universities and groups like the Nature Conservancy are being questioned. Staff retains ultimate control with selection of the data sets for presentation, and can remove or withhold data sets should there be significant questions, much as the Antelope Valley Regional Conservation Investment Strategy has been removed. The data set is not designed to provide an approval or denial and including a disclaimer before accessing the data is appropriate. The data available should be provided for the entire region and not restricted to certain undeveloped areas as proposed by some commenters, as that would lead to less usefulness and reduced transparency.

Regarding Item 10 and 13, I hope and trust that SCAG gives a balanced update regarding the important housing legislation passed of SB 9 and its actual impact on the region, and the dramatic changes that could happen not just to housing but to many aspects of our environmental and planning laws should the so-called "Californians for Community Planning Voter Initiative" be passed. Many groups such as the Turner Center have stated that SB 9 will not result in dramatic changes to neighborhoods, nor will every, or even every tenth homeowner choose to use SB 9 to create four units on an existing single family zoned lot. It is appropriate for SCAG to work with cities to see if there is a mad rush of developers waiting to use SB 9 to create more homes, and to urge they be mitigated in future legislation, but the impact to most SCAG cities will be marginal. Given the magnitude of the housing crisis though, every bit counts.

I urge SCAG to not take a position on the "Californians for Community Planning Voter Initiative". The Legislative Analyst's Office will be providing a more detailed analysis in the coming weeks. This law would not help meet the environmental challenge and racial equity challenges mentioned later in the agenda.

Sincerely,  
Henry Fung  
Covina, CA

Sent from my iPhone



October 06, 2021

Honorable Clint Lorimore  
President, Regional Council  
Southern California Association of Governments  
900 Wilshire Blvd., Suite 1700  
Los Angeles, CA 90017

Re: SoCal Greenprint Initiative

The SoCal Greenprint is an important resource to help all stakeholders plan for a healthier and more sustainable Southern California as the region prepares to accommodate more housing, growing economic activity and the need for better transportation options.

While we know that the SoCal Greenprint does not create new policies or rules, the value of having easy access to a regional perspective on environmental issues can help us address issues that do not have jurisdictional boundaries, such as air quality, conservation of important habitat space and preparing for the impacts of climate change. By compiling already publicly available data sources into interactive maps, stakeholders such as developers can better understand how to make decisions about projects to help build green, healthy communities. Easy access to data is the first step in making smarter planning decisions, and the SoCal Greenprint is an important resource that SCAG can provide to the stakeholders who will be shaping the future of the region.

The Oct. 7 meeting is the third public meeting where the SCAG Regional Council has received input from more than 80 organizations who have expressed the need for data-driven resources that support the region's environmental and development goals. The public meetings are in addition to the outreach that was done during the yearlong process to develop the team, which includes feedback from more than 60 organizations that represent the six SCAG counties and come from diverse backgrounds such as academia, conservation advocates, developers and government agencies, all who have provided important feedback on how the SoCal Greenprint can be a useful resource. Furthermore, SCAG collected feedback via a survey on the data sources that will be used, and the list has been publicly available for weeks. Southern California has always been an environmental leader, and completing the SoCal Greenprint is a signal that the region continues to take its leadership role seriously.

As the region prepares for economic recovery following the pandemic, and cities across Southern California prepare to accommodate new housing and economic growth, any further delays to the SoCal

# Outward Bound Adventures



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Greenprint mean that this useful resource will not be available to help make smarter decisions about how to incorporate nature into the future of the region. It is time to move the project toward completion and reinforce our regional commitment to building a sustainable Southern California.

Thank you,

Charles Thomas

A handwritten signature in black ink, appearing to read 'Charles Thomas'.



October 6, 2021

President Clint Lorimore and Regional Council Members  
Southern California Association of Governments  
900 Wilshire Blvd., Suite 1700  
Los Angeles, CA 90017

**RE: Need for the Regional Council to halt the SoCal Greenprint formulation process, and restart it only after first providing clear and well-considered policy direction consistent with the adopted mitigation measures in the Connect SoCal PEIR, which call for its development.**

Dear President Lorimore and Regional Council Members:

On behalf of the business, industry and community organizations indicated below, we write today as a Business Coalition to express our persistent concerns about SCAG's ongoing development of the SoCal Greenprint. We are a diverse coalition of business and community organizations deeply interested in our region's economy, infrastructure, housing, liveability and well-being. Many of us wrote to you on April 30, 2021, on June 29, 2021 and then again on August 24, 2021, to express our concerns about our understanding of the Greenprint as it came into focus. Since then, other major constituents, including representatives of local governments, have expressed similar and compelling concerns about the way that the Greenprint is unfolding.

We write today to add again to the statements of concern lodged thus far, and to recommend that the Regional Council stop SCAG's staff work on the Greenprint until the Regional Council prescribes the principles and policies to which staff should adhere when it restarts its work on the Greenprint. In particular, we ask SCAG to stop the Greenprint process, and restart it only under the Regional Council's direction with clear policy prescriptions related to the Greenprint's goals, purpose, content, use, limitations, and process for review and approval. These are basics first steps for which we would ask concerning any undertaking as important as the Greenprint. In short, our concern with Greenprint is that to date it has been a technical exercise that was commenced without clear policy direction or guidance. Without these, "the cart is before the horse."

As we explained in our August 24<sup>th</sup> letter referenced above, we appreciate that SCAG promised to develop the Greenprint as a mitigation measure when SCAG approved the programmatic environmental impact report (PEIR) concerning the 2020 regional transportation plan/sustainable communities strategy, Connect SoCal. (We are resending a copy of our August 24<sup>th</sup> letter along with this letter; and we encourage Regional Council members to review it, as it contains a more thorough discussion of our concerns.) When SCAG adopted Connect SoCal and the PEIR, SCAG made promises and commitments set forth in two specific mitigation measures related to Greenprint. Those express mitigation measures were innocuous when compared to what we've seen unfolding in the year since their adoption.

Specifically, SCAG's mitigation measure denominated as SMM BIO-2 contains the following:

**"The Regional Greenprint effort shall also produce a white paper ..., which includes approaches for ... needed science and analysis, models, challenges and opportunities and recommendations."**

This threshold step of first creating a well-considered “white paper” as outlined in SMM BIO-2 is precisely the first step that has been missing from the Greenprint process to date.

The mitigation measures, general and as innocuous as they are, also suggest that the Greenprint is intended to have various uses related to informing regional land use decision making. The mitigation measure SMM BIO-2 characterizes the Greenprint as (i) an aggregation of data, (ii) a land use visioning tool, and (iii) a precursor to a yet to be defined, new Regional Advanced Mitigation Program (RAMP) initiative to preserve habitat. When one appreciates the breadth and importance of Greenprint and its intended uses as outlined in Connect SoCal and the PEIR, it becomes clear that the Greenprint process must be done correctly from the start. The mitigation measure SMM BIO-2 itself recognized this importance through its promise of developing a threshold white paper.

The need for Regional Council oversight and direction in such a threshold policy determination should be clear given the many complaints that have been voiced about the nascent Greenprint process. The complaints seem to be focused on three basic areas of concern. First, there is a growing chorus urging that the Greenprint should be focused only on the lands within the SCAG territory which our regions’ local governments have not designated for development. In other words, the Greenprint should be applicable only to land presently designated by local jurisdictions as open space and agricultural lands. The reasoning behind the concern is that an overly-expansive Greenprint could be wielded prejudicially against the mere continuation and realization of existing, already-approved general plans – let alone against their reasonable adjustment and, where most suitable, expansion. Our concerns about the land use implications are all the more heightened due to the planning challenges that local governments currently face due to the recent regional housing needs assessment (RHNA) allocations.

Second, SCAG’s staff and its consultants have already identified 166 datasets for possible inclusion in the Greenprint. Perusal of the 166 datasets reveals a “mixed bag” of data, academic theories and arguable conclusions, some of which are reasonably well-established, others that are at best questionable, and others that are even worse. Given that the Greenprint – even if its spatial applicability is limited – will apply to vast amounts of land, it should not be turned into a long analytical gauntlet comprised of a huge number of datasets having a wide range of quality and credence. Therefore, as we stated at the outset of this letter, the Regional Council must provide SCAG’s staff with proper prescriptions and clear guidance concerning the Greenprint, including criteria about how to select datasets of the kind that will qualify for inclusion in the Greenprint database.

Third, our coalition and others have complained repeatedly about the process by which the Greenprint is being hastily developed. Even though the development of the Greenprint is a promised mitigation measure under Connect SoCal, there is no statutory deadline that must be met. SCAG has the discretion to choose a reasonable timeline for its development. In addition, the PEIR language calls for a “multi-year” undertaking to develop (first) criteria and (then) the best data to identify and select open space and agricultural lands for voluntary conservation efforts. Instead, SCAG’s staff assigned the responsibility for the Greenprint development to a non-governmental organization that, despite its best intentions, is institutionally incapable of appreciating the many factors that local governments must carefully balance when they consider and make land use decisions.

For the reasons set forth above, we believe that the process for developing the Greenprint initially should have started with a very careful discussion in which the Regional Council articulates threshold policies, principles, and limitations concerning the Greenprint. Because that did not occur, we join with those now calling for the Greenprint process to transition from the current ambiguous pause to a “stop,” and then a “restart” only after appropriate engagement of the Regional Council to set a clear policy direction for the Greenprint as stated above.

We look forward to our continued participation in the Regional Council’s efforts related to the Greenprint. We will continue to work to assure that the prerogatives of local jurisdictions are honored and the region’s economy, infrastructure, housing, liveability and well-being are advanced.

Sincerely,



Richard Lambros, Managing Director  
Southern California Leadership Council



Tracy Hernandez, Chief Executive Officer  
Los Angeles County Business Federation (BizFed)



Lucy Dunn, President & CEO  
Orange County Business Council (OCBC)



Paul Granillo, President & CEO  
Inland Empire Economic Partnership (IEEP)



Maria Salinas, President & CEO  
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Ray Baca, Executive Director  
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Dexter McLeod, Chief Executive Officer  
L.A. South Chamber of Commerce



Fabián Naranjo González, Ph.D. , Director of  
Public Policy  
San Gabriel Valley Economic Partnership



Ivan Volschenk, President & CEO  
Santa Clarita Valley Chamber of Commerce



Mario Rodriguez, Chairman  
Hispanic 100



Jeremy Harris, President & CEO  
Long Beach Area Chamber of Commerce



Donna Duperron, President & CEO  
Torrance Area Chamber of Commerce



Barbara Thomas, Executive Director  
South Orange County Economic Coalition



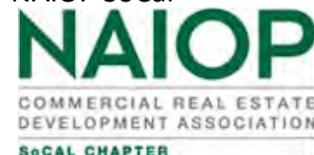
Louise Lampara, Executive Director  
Ventura County Coalition of Labor, Agriculture  
and Business (CoLAB)



Mike Lewis, Senior Vice President  
Construction Industry Air Quality Coalition (CIAQC)  
and Construction Industry Coalition on Water  
Quality (CICWQ)



Timothy Jemal, Chief Executive Officer  
NAIOP SoCal



Carolyn Cavecche, President & CEO  
Orange County Taxpayers Association





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SOUTHERN CALIFORNIA CONTRACTORS ASSOCIATION



**SANTA CLARITA VALLEY Chamber of Commerce**



August 24, 2021

President Clint Lorimore and Regional Council Members  
Southern California Association of Governments  
900 Wilshire Blvd., Suite 1700  
Los Angeles, CA 90017

**RE: Comments on the SoCal Greenprint and Request that the SCAG Regional Council Redirect the Development of Greenprint to be Consistent with Local Control and the Authorizing Language in Connect SoCal**

Dear President Lorimore and Regional Council Members:

On behalf of the business, industry and community organizations subscribing to this letter, we write today as a Business Coalition to express our further concerns about SCAG staff's thus far very problematic development of the SoCal Greenprint. On April 30, 2021, a diverse coalition of business and community interests submitted a letter to then-President Rex Richardson outlining several serious concerns with the early stages of the development of the Greenprint. On June 29, 2021, a similar group of signatories wrote to ask the Regional Council to undertake a special hearing to discuss, better oversee, and steer the Greenprint effort. Soon afterward, the Regional Council voted to pause work on the Greenprint so that the Regional Council could grasp and debate the concerns about the path on which the Greenprint development was headed.

As we indicated previously, we do not oppose – and instead support – SCAG's determination to develop a Greenprint. We recognize, in light of two mitigation measures that SCAG formally adopted in connection with last year's Connect SoCal (SMM BIO-2 and SMM AG-2), that SCAG is committed to developing a Greenprint following an appropriate amount of research, investigation, and consideration. What we oppose is any hasty and poorly-managed Greenprint development process like the one that is presently underway, which seems sure to result in a problematic Greenprint. Importantly, a problematic Greenprint would undercut our collective efforts to provide sufficiently robust job, infrastructure, and housing opportunities in the years and decades ahead. The Regional Council should not stand by and permit such a result. Especially in light of our region's great need for more housing production and the present demand on our 197 local governments to accommodate over 1.3 million housing units under the Regional Housing Needs Assessment (RHNA) process. A wrongheaded approach to the Greenprint will make our local governments' challenges even more daunting, and could inadvertently hand housing opponents the ammunition to delay and prevent greatly needed housing projects.

When SCAG adopted Connect SoCal last year, it concurrently approved an addendum to the accompanying program environmental impact report (PEIR) which included the adoption of two mitigation measures specifically pertaining to the development of the Greenprint.<sup>1</sup> One of the two mitigation measures, denominated SMM BIO-2, reads as follows (with emphasis added below):

**SCAG shall continue to develop a regional conservation strategy in coordination with local jurisdictions and other stakeholders, including the county transportation commissions. The conservation strategy will build upon existing efforts including**

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<sup>1</sup> When SCAG's Regional Council approved the programmatic environmental impact report (PEIR) that pertains to the later-approved Connect SoCal, it approved an accompanying addendum containing both (i) final alterations to promised Connect SoCal mitigation measures, and (ii) an appendix containing SCAG's responses to public comments. SCAG is legally bound by the contents of the former (i.e., SCAG is legally obligated to adhere to the terms of the promised mitigation measures *per se*).

**those at the sub-regional and local levels to identify potential priority conservation areas.** SCAG will also collaborate with stakeholders to establish a new Regional Advanced Mitigation Program (RAMP) initiative to preserve habitat. The RAMP would establish and/or supplement regional conservation and mitigation banks and/or other approaches to offset the impacts of transportation and other development projects.

**To assist in defining the RAMP, SCAG shall lead a multi-year effort to develop new regional tools, like the Regional Data Platform and Regional Greenprint that will provide an easily accessible resource to help municipalities, conservation groups, developers and researchers prioritize land for conservation based on best available scientific data.** The Regional Greenprint effort shall also produce a white paper on the RAMP initiative, which includes approaches for the RAMP in the SCAG region, needed science and analysis, models, challenges and opportunities and recommendations.

The other mitigation measure concerning the Greenprint, which is denominated SMM AG-2, reads as follows (with emphasis added below):

SCAG shall develop a Regional Greenprint, which is a strategic web-based conservation tool that provides the best available scientific data and scenario visualizations to help cities, counties and transportation agencies make better land use and transportation infrastructure decisions and conserve natural and farm lands. **SCAG shall use the Greenprint to identify priority conservation areas** and work with CTCs to develop advanced mitigation programs or include them in future transportation measures by (1) funding pilot programs that encourage advance mitigation including data and replicable processes, (2) participating in state-level efforts that would support regional advanced mitigation planning in the SCAG region, and (3) supporting the inclusion of advance mitigation programs at county level transportation measures.

We have many concerns about the missteps that SCAG's staff has already taken in deviation from the mitigation measures set forth above. Briefly, our concerns are as follows:

- Although SCAG tasked itself with undertaking a "multi-year effort" to develop a Regional Greenprint "to help prioritize land conservation **based on best available scientific data[,]**" SCAG's staff then delegated the developmental responsibilities to The Nature Conservancy, which is an organization whose sole mission and business model is the

management of lands placed in conservancies and trusts. Thus, they are the beneficiaries of dedicated open spaces and are naturally inclined to limit and preclude land development. SCAG's staff thus chose as the leader of the Greenprint effort an entity that is inherently biased when it comes to marshalling and balancing the many competing factors that must be carefully weighed in any sound land use decision-making. SCAG's choice of the The Nature Conservancy to lead the Greenprint effort is impolitic and has the appearance of prejudicing the Greenprint process. ***SCAG's staff must now employ a higher standard of care to assure that all other interests and stakeholders are heard and respected, that land use data sets in Greenprint are balanced, and that data is properly vetted, especially for scientific validity and acceptance, before proceeding to a final Greenprint.***

- Although the mitigation measure denominated SMM BIO-2 calls for a “multi-year effort” to marshal “best available scientific data,” four weeks ago, SCAG's staff reported out to stakeholders interested in the Greenprint process that it and The Nature Conservancy have already gathered 166 different data sets which they propose should all potentially overlie land use planning in the SCAG region. Generally (ignoring specifics at this point), the sources and qualities of many of these data sets are problematic by degree. Many of them are products of neither meaningful public processes nor the careful balancing that realistically must adhere to sound land use decision-making. Concerning the 166 data sets, a quick review indicates that 21 were compiled by non-governmental organizations (having their own agendas and biases ), 14 were compiled by academics (potentially the same), and 38 reflect various constraints and data sets compiled over time by SCAG's staff. Concerning the latter, some are the products of SCAG's ad hoc working groups, which are typically populated through self-selection and often by single-issue advocates having different levels of real-world land use policy expertise. Such products cannot serve as substitutes for the kind of informed factual analysis and careful balancing that takes place within the respective local jurisdictions when they undertake land use decision-making. That is why it is particularly troubling that the 166 different data sets currently proposed to populate the Greenprint do not include locally-approved general plans and land use designations, which are perhaps the most important and relevant data of all. This cannot be regarded as consistent with SCAG's often-repeated pledge to respect and adhere to local control in land use planning.

Therefore, we urge SCAG to consider several options that should be pursued concerning the further development and ultimate use of the Greenprint, as follows:

- First, Greenprint can and should be appropriately limited in terms of its spatial applicability. Specifically, within the SCAG region, ***Greenprint should apply only where the respective local jurisdiction has identified areas as open space/agricultural land.*** Such a spatial limitation in terms of the Greenprint’s applicability is consistent with the evolution of the relevant mitigation measures (SMM BIO-2 and SMM AG-2) which led to its formal adoption in connection with Connect SoCal last year.<sup>2</sup>
  
- Stating the same solution differently, ***the Greenprint should have no applicability to areas where the relevant local jurisdiction has identified land as suitable for development.*** Specifying such a limitation on the applicability of the Greenprint is needed so that local governments will be free to redesignate developable land for housing, infrastructure, and other appropriate uses. Such latitude is needed, given that local governments must work to meet RHNA allocation mandates, and otherwise take ongoing steps to address the housing shortage crisis in the region. Similarly, Greenprint should have no applicability where further land use approvals can and should be readily anticipated, such as within spheres of influence, where local governments may have dormant, but foreseeable, land use discretion.
  
- If the above-stated option (limiting the spatial applicability of the Greenprint) is not adopted, then the Greenprint foreseeably can and will be abused by the opponents of growth, infrastructure, and housing to attack general plans and projects under the California Environmental Quality Act (CEQA), which requires consideration and discussion (rationalization) of the consistency of approvals with regional plans.<sup>3</sup> In other words, SCAG should not elevate each of the 166 potential data sets thus far identified by SCAG’s staff to constitute 166 separate points of contention for vexatious litigants to grasp upon and advance. Nor should local governments be forced to marshal substantial evidence to counter each of the potentially 166 or more data sets, or their countless respective underpinnings in order to amend or even to maintain and reconfirm or effectuate their existing land

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<sup>2</sup> Prior to being finalized and approved by the Regional Council, the penultimate draft of SMM BIO-2, in particular, expressly discussed using the Greenprint to identify infill and redevelopment opportunities, thus implying that the Greenprint might overlies developable areas and even already developed areas other than areas theretofore identified by the local jurisdiction as open space and agricultural lands. The implication was removed from SMM BIO-2 as ultimately expressed.

<sup>3</sup> CEQA Guidelines section 15125(d) generally requires local jurisdictions acting as lead agencies to discuss and rationalize “any inconsistencies between the project and regional plans.”

use plans and designations. Unless an appropriate spatial limitation on the Greenprint's applicability is put in place to protect local jurisdictions' existing, approved plans and visions, the Greenprint will be used by foes of land uses to undermine and negate plans and approvals based on an endless kitchen sink of considerations, some of which by degree are dubious or merely arguable.

- If the development and applicability of Greenprint is properly constrained and its underlying data is limited to that which is appropriate for its purpose, then additional data sets that were not appropriate for inclusion in Greenprint may still be made available by SCAG for strictly informational purposes through its online mapping and data sets. In this way, additional data could be made available, but without any prejudicial effect under CEQA. The data sets that are being proffered by various non-governmental organizations and academics for potential inclusion should be excluded, however, if and to the extent they were compiled and published without undergoing the kinds of public participation processes that governmental agencies must administer.

If SCAG were ultimately to refuse to qualify and limit the Greenprint as recommended above, then the Greenprint will constitute a radical expansion of SCAG's level of detailed prescription over local land use decisions, undertaken under the guise of conserving habitat and agricultural lands. This is easily understood when one considers SCAG's 2016 RTP/SCS, and particularly Appendix 10 thereto, entitled "Natural and Farm Lands." In that 2016 technical appendix, SCAG adopted a delineation of the SCAG region wherein they designated all privately owned, undeveloped land as one of three types: low, medium, or high value habitat.<sup>4</sup> Importantly, even where SCAG labeled land as "high value habitat" back in 2016, any such labeling could be dealt with very easily and locally by undertaking or having in hand a local or project-specific habitat study, whereby superior local knowledge based on presence would speedily prevail. Therefore, SCAG's 2016 RTP/SCS delineations and the labeling of natural lands by their supposed habitat value did not create any Herculean CEQA challenges that might undermine, hamstring, or reverse local land use decision-making. For the reasons discussed above, however, if our concerns stated above were to fall on deaf ears, then the Greenprint as it is now unfolding, with its 166 potential data sets (so far), and with SCAG's staff seemingly intent upon applying these many data sets to every speck of land in the region, will create an infinite number of potential CEQA challenges to development, infrastructure, and housing.

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<sup>4</sup> SCAG's 2016 Natural and Farm Lands technical appendix, at page 3, explained that SCAG's habitat delineation was based on its own, internal analysis of "more than 70 GIS databases." The discussion and context suggest that these were mostly data sets published by the California Department of Fish and Wildlife and the United States Fish and Wildlife Service – which constitute data that are routinely applied to local land use decisions.

In light of the concerns stated above, we respectfully request that SCAG Leadership and the Regional Council take charge of the Greenprint process. In doing so, we ask the Regional Council to move the Greenprint forward in a manner and scope that is consistent with SCAG's mitigation measures (SMM BIO-2 and SMM AG-2) that call for its establishment. Through the Regional Council's involvement, SCAG must assure that the Greenprint will not conflict with local governments' existing land use plans and prerogatives. The result should be a Greenprint that is focused appropriately on the natural and agricultural lands most suitable for conservation and preservation.

We greatly appreciate SCAG's attention to the issues raised in this letter. We look forward to working with you over the weeks and months ahead to ensure that the SoCal Greenprint is appropriately crafted.

Sincerely,



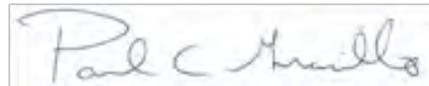
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Los Angeles Area Chamber of Commerce



Jon Switalski, Executive Director  
Rebuild SoCal Partnership





Ray Baca, Executive Director  
Engineering Contractors' Association (ECA)



Bradley Kimball, Executive Vice President  
Southern California Contractors Association (SCCA)



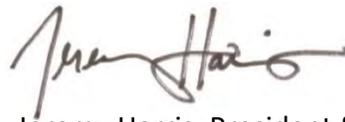
William R. Manis, President & CEO  
San Gabriel Valley Economic Partnership



Ivan Volschenk, President & CEO  
Santa Clarita Valley Chamber of Commerce



Mario Rodriguez, Chairman  
Hispanic 100



Jeremy Harris, President & CEO  
Long Beach Area Chamber of Commerce

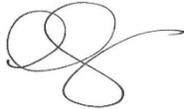


Donna Duperron, President & CEO  
Torrance Area Chamber of Commerce



Barbara Thomas, Executive Director  
South Orange County Economic Coalition

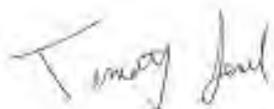




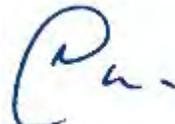
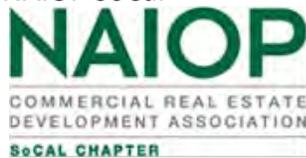
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Timothy Jemal, Chief Executive Officer  
NAIOP SoCal



Andrew W. Gregson, President & CEO  
North Orange County Chamber of Commerce



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**From:** Will Wright <will@aialosangeles.org>  
**Sent:** Thursday, October 7, 2021 11:30 AM  
**To:** SCAG Green Region  
**Subject:** Support for SoCal Greenprint Initiative // ADVANCE THIS RESOURCE NOW

October 7, 2021

Honorable Clint Lorimore  
President, Regional Council  
Southern California Association of Governments  
900 Wilshire Blvd., Suite 1700  
Los Angeles, CA 90017

Dear Hon. Lorimore,

As the Director of Government & Public Affairs for the Los Angeles chapter of The American Institute of Architects (AIA LA), I am writing to share my strong support for the SoCal Greenprint Initiative.

The SoCal Greenprint is an important resource to help all stakeholders plan for a healthier and more sustainable Southern California as the region prepares to accommodate more housing, growing economic activity and the need for better transportation options.

**UPDATED RECOMMENDATIONS:**

- The last-minute staff report makes unnecessary recommendations that prolong what has already been a robust, yearlong process and requires additional resources. We should revert to the recommendations made in the original staff report and move the SoCal Greenprint toward completion.
- The new recommendations are clearly dictated by the building industry and leave out the more than 60 stakeholders who have spent more than a year providing important feedback to shape the project. We cannot allow for a narrow group of stakeholders to dictate the future of this project.
- This is now the third public hearing we are holding on the SoCal Greenprint. There has been ample opportunity for feedback and engagement, and all stakeholders, including developers and the building industry, have been at the table. It is now time to move the project across the finish line.
- SCAG has made the list of data sources available for review on its website, issued a survey for feedback and used stakeholder input, which includes developers, to produce its final list. We should have certainty by now that the data is publicly available, already vetted, and relevant to the goals of the project.
- We are concerned that the section that would be most affected by the updated language in the staff report is the proposed equity section of the SoCal Greenprint.

While we know that the SoCal Greenprint does not create new policies or rules, the value of having easy access to a regional perspective on environmental issues can help us address issues that do not have jurisdictional boundaries, such as air quality, conservation of important habitat space and preparing for the impacts of climate change. By compiling already publicly available data sources into interactive maps, stakeholders such as developers can better understand how to make decisions about projects to help build green, healthy communities. Easy access to data is the first step in making smarter planning decisions, and the SoCal Greenprint is an important resource that SCAG can provide to the stakeholders who will be shaping the future of the region.

The Oct. 7 meeting is the third public meeting where the SCAG Regional Council has received input from more than 80 organizations who have expressed the need for a data-driven resources that supports the region's environmental and development goals. The public meetings are in addition to the outreach that was done during the yearlong process to develop the team, which includes feedback from more than 60 organizations that represent the six SCAG counties and come from diverse backgrounds such as academia, conservation advocates, developers and government agencies, all who have provided important feedback on how the SoCal Greenprint can be a useful resource. Furthermore, SCAG collected feedback via a survey on the data sources that will be used, and the list has been publicly available for weeks. Southern California has always been an environmental leader, and completing the SoCal Greenprint is a signal that the region continues to take its leadership role seriously.

As the region prepares for economic recovery following the pandemic, and cities across Southern California prepare to accommodate new housing and economic growth, any further delays to the SoCal Greenprint mean that this useful resource will not be available to help make smarter decisions about how to incorporate nature into the future of the region. It is time to move the project toward completion and reinforce our regional commitment to building a sustainable Southern California.

Very truly yours,

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