

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

List of Public Comments

Received before 5pm on Wednesday, October 6, 2021

| | Date | Signatory Name | Organization | Agenda Item (AI #) | Subject Matter |
|----|-------------|--|--|-----------------------------|--|
| 1. | 9/02/2021 | Jeff Montejano | Building Industry Association of Southern California (BIASC) | RC AI #1 - SoCal Greenprint | Concerns about the Greenprint and datasets |
| 2. | 9/21/2021 | Hon. Michael C. Carroll | City of Irvine (RC Member) | RC AI #1 - SoCal Greenprint | Concerns about the Greenprint process, usage, and data layers |
| 3. | 9/24/2021 | Adam Wood, Jennifer Hernandez, Andrew R. Henderson, Thomas Mullen | Building Industry Association of Southern California (BIASC), Building Industry Legal Defense Foundation (BILDF) | RC AI #1 - SoCal Greenprint | Concerns regarding data, specific datasets, and process |
| 4. | 9/28/2021 | Dave Bartlett, Jeff Montejano, David Little, Diana Coronado, Sunti Kumjim, Adam S. Wood, Tim Roberts, Carlos Rodriguez, Greg Shaia, Lou Monville | Building Industry Association of Southern California (BIASC) | RC AI #1 - SoCal Greenprint | Recommendations to Greenprint |
| 5. | 9/29/2021 | John Russo | SynchroniCITY Associates | RC AI #1 - SoCal Greenprint | Concerns regarding potential new litigation related to housing |
| 6. | 9/29/2021 | Paul Caron | Caltrans | RC AI #1 - SoCal Greenprint | Support for Greenprint to help Caltrans with mitigation |
| 7. | 9/30/2021 | David Diaz | Active San Gabriel Valley | RC AI #1 - SoCal Greenprint | Support with recommendation to launch in the Fall |
| 8. | 10/1/2021 | Dan Silver | Endangered Habitats League | RC AI #1 - SoCal Greenprint | Greenprint will support decision making |
| 9. | 10/1/2021 | Ismar Enriquez | The American Institute of Architects – Los Angeles | RC AI #1 - SoCal Greenprint | Supports the Greenprint and will help make informed decision |

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| 10. | 10/1/2021 | Will Wright | The American Institute of Architects – Los Angeles | RC AI #1 - SoCal Greenprint | Supports the Greenprint so that it can help with making informed decisions |
| 11. | 10/4/2021 | Lillian Cai (email received from Francis Appiah) | Caltrans | RC AI #1 - SoCal Greenprint | Support the Greenprint for land use and transportation |
| 12. | 10/04/2021 | Gayle Waite | Laguna Canyon Conservancy | RC AI #1 - SoCal Greenprint | Support the Greenprint for planners, decision makers, and landowners to learn about the natural and built lands |
| 13. | 10/05/2021 | Gloria Sefton | Saddleback Canyons Conservancy | RC AI #1 - SoCal Greenprint | Supports the Greenprint for baseline information |
| 14. | 10/05/2021 | Angela Lindstrom | Friends of Coyote Hills | RC AI #1 - SoCal Greenprint | Supports the Greenprint to include entitled or proposed housing projects |
| 15. | 10/05/2021 | Will Wright | The American Institute of Architects – Los Angeles | RC AI #1 - SoCal Greenprint | Supports the Greenprint as a resource |
| 16. | 10/05/2021 | Wendy Butts | Los Angeles Conservation Corps | RC AI #1 - SoCal Greenprint | Supports the Greenprint as a resource |
| 17. | 10/05/2021 | Nicole A. Johnson | Tataviam Land Conservancy | RC AI #1 - SoCal Greenprint | Supports the Greenprint as a resource |
| 18. | 10/06/2021 | Brad C. Jenkins | California Native Plant Society, Orange County Chapter | RC AI #1 - SoCal Greenprint | Supports the Greenprint for zoning, planning, and projects |
| 19. | 10/06/2021 | Marc W. Hardy | Tejon Ranch Company | RC AI #1 - SoCal Greenprint | Concerns about datasets, specifically #119 |
| 20. | 10/06/2021 | Maria Patiño Gutierrez | Strategic Actions for a Just Economy (SAJE) | RC AI #1 - SoCal Greenprint | Supports the Greenprint as a resource |
| 21. | 10/06/2021 | Ben Stapleton | U.S. Green Building Council – Los Angeles (USGBCLA) | RC AI #1 - SoCal Greenprint | Supports the completion of the Greenprint |

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| 22. | 10/06/2021 | Brittany D. Rivas | Los Angeles Alliance for a New Economy (LAANE) | RC AI #1 - SoCal Greenprint | Supports the Greenprint's finalization and as a resource |
| 23. | 10/06/2021 | Christopher Chavez | Coalition for Clean Air | RC AI #1 - SoCal Greenprint | Supports the Greenprint as a resource, and urges the process to move forward |
| 24. | 10/06/2021 | Meea Kang | Council of Infill Builders | RC AI #1 - SoCal Greenprint | Supports the Greenprint as a resource for infill development |
| 25. | 10/06/2021 | Brad Avery | City of Newport Beach | RC AI #1 - SoCal Greenprint | Concerns over Greenprint data, mitigation, and CEQA; requests clarification of scope and intent |
| 26. | 10/06/2021 | Gabriel M.B. Ross | Shute, Mihaly & Weinberger LLP on behalf of Hills for Everyone | RC AI #1 - SoCal Greenprint | Concerns over stakeholder interpretation of the Greenprint; supports the completion of the Greenprint |
| 27. | 10/06/2021 | Susan A. Phillips | Robert Redford Conservancy for Southern California (RRC for SoCal) Sustainability | RC AI #1 - SoCal Greenprint | Supports the Greenprint as a resource, values the equity component, and encourages Fall 2021 launch |
| 28. | 10/06/2021 | Melanie Schlotterbeck | Natural and Farmlands Coalition (Amigos de Bolsa Chica, Amigos de los Rios, Ballona Wetlands Land Trust, Banning Ranch Conservancy, Bolsa Chica Land Trust, California Chaparral Institute, California Cultural Resource Preservation Alliance, California Native Plant Society - Orange County Chapter, California Wildlife Foundation/California Oaks, Center for Biological Diversity, Coachella Valley Waterkeeper, Defenders of Wildlife, Diamond Bar-Pomona | RC AI #1 - SoCal Greenprint | Supports the Greenprint as a resource; concerns on the process challenges of developing the Greenprint |

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| | | | <p>Valley Task Force of the Sierra Club, Endangered Habitats League, Fallbrook Land Conservancy, Friends of Coyote Hills, Friends of Harbors, Beaches and Parks, Hills For Everyone, Hobo Aliso Task Force of the Sierra Club, Huntington Beach Tree Society, Inc., Inland Empire Waterkeeper, Laguna Canyon Conservancy, Laguna Ocean Foundation, League of Women Voters of Orange Coast, Los Angeles, Santa Monica Chapters of the California Native Plant Society, Los Cerritos Wetlands Land Trust, Natural Resources Defense Council, Naturalist For You - Santa Ana Mountains Wild Heritage Project, Orange Coast River Park, Orange County Interfaith Coalition for the Environment, Orange County League of Conservation Voters, Orange County Coastkeeper, Pomona Valley Audubon Society, Puente-Chino Hills Task Force of the Sierra Club, Residents for Responsible Desalination, Responsible Land Use (Diamond Bar), Rio Hondo Group of the Sierra Club, Rural Canyons Conservation Fund, Saddleback Canyons Conservancy, Sea and Sage Audubon Society, Stop Polluting Our Newport, Surfrider - Newport Beach Chapter, Surfrider - South Orange County Chapter, Surfrider LA, The Trust for Public Land, Tri-County</p> | | |
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| | | | Conservation League, Ventura Land Trust, Wild Heritage Planners, Women 4 Orange County) | | |
| 29. | 10/06/2021 | Celina Oliveri (email received from Francis Appiah) | Caltrans | RC AI #1 - SoCal Greenprint | Supports the Greenprint as a resource for open space and working lands |
| 30. | 10/06/2021 | Elva Yañez | Prevention Institute | RC AI #1 - SoCal Greenprint | Supports the Greenprint as a resource, and its completion |
| 31. | 10/06/2021 | Virginia Esperanza Lorne | Laguna Ocean Foundation | RC AI #1 - SoCal Greenprint | Supports the Greenprint as a resource, and its completion |
| 32. | 10/06/2021 | Robert Wang (email received from Francis Appiah) | Caltrans | RC AI #1 - SoCal Greenprint | Supports the Greenprint as a resource to help communities prioritize their parks and conservation goals |
| 33. | 10/06/2021 | Susy Boyd | Mojave Desert Land Trust | RC AI #1 - SoCal Greenprint | Supports the Greenprint as a resource, and smart regional planning |
| 34. | 10/06/2021 | Assemblymember Laura Friedman | California State Assembly | RC AI #1 - SoCal Greenprint | Supports the Greenprint as a resource to make informed decisions |
| 35. | 10/06/2021 | Francis Appiah | Caltrans | RC AI #1 - SoCal Greenprint | Supports the Greenprint as a resource to make informed decisions |
| 36. | 10/06/2021 | Newton Wong (email received from Francis Appiah) | Caltrans | RC AI #1 - SoCal Greenprint | Supports the Greenprint for the promotion of ecological health and cultural landscape preservation |
| 37. | 10/06/2021 | Stephanie Pincetl | UCLA Institute of the Environment and Sustainability | RC AI #1 - SoCal Greenprint | Supports the Greenprint to ensure development is socially, environmentally, and economically sustainable |
| 38. | 10/06/2021 | Bryn Lindblad, Dan Silver, Louis Mirante, Leonora Camner, Carter Rubin, | Climate Resolve, Endangered Habitats League, CA YIMBY, Everyone In, Natural Resources | RC AI #1 - SoCal Greenprint | Supports the Greenprint to better integrate nature into future growth and development |

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| | | Tommy Newman, Elizabeth Reid-Waistcoat, Tara Barauskas and Andy Hattala, Ismar Enriquez, Fatima Malik, Zachary Schlagel | Defense Council (NRDC), Abundant Housing LA, Center for Biological Diversity, The Climate Reality Project Los Angeles Chapter, League of Women Voters of Los Angeles County, AIA Los Angeles, People Assisting the Homeless (PATH) | | |
| 39. | 10/06/2021 | Terry M. Welsh | Banning Ranch Conservancy | RC AI #1 - SoCal Greenprint | Supports the Greenprint to provide scientific data and information; supports completion of the Greenprint |
| 40. | 10/06/2021 | Michael Wellborn | Friends of Harbors, Beaches, and Parks (FHBP) | RC AI #1 - SoCal Greenprint | Supports the Greenprint as a resource; concerns on the process challenges of developing the Greenprint; supports completion of the Greenprint |
| 41. | 10/06/2021 | Supervisor Kelly Long | County of Ventura Board of Supervisors | RC AI #1 - SoCal Greenprint | Concerns over the Greenprint, its intended uses and local control |
| 42. | 10/06/2021 | Adam Wood | Building Industry Legal Defense Foundation (BILDF) | RC AI #1 - SoCal Greenprint | Concerns over the Greenprint, data, timing and process, local control, CEQA; requests Greenprint be stopped and re-started |



Building Industry Association of Southern California, Inc.

September 2, 2021

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

RE: SoCal Greenprint Working Group

Dear Mr. Ajise:

Thank you for the opportunity to continue our conversation on the SoCal Greenprint. We look forward to working with your staff to better illustrate the concerns the Building Industry Association of Southern California, along with our coalition partners, share regarding the development of the SoCal Greenprint.

As we embark on the process of creating an aligned understanding of the impacts the SoCal Greenprint will impart on the SCAG region, we share the attached PowerPoint presentation which outlines several key issues. We fully appreciate that the SoCal Greenprint is still in a draft form and that nothing has been finalized for ultimate presentation or adoption. Nevertheless, the direction of the SoCal Greenprint and the datasets under consideration are a cause of great consternation and we will be using the data in this Power Point as a starting point for our talks.

We greatly appreciate the opportunity to elaborate on the legal mechanisms that will, albeit inadvertently, convert the Greenprint into a tool that dictates land use decisions. We understand that this is not the intention, but it will be the result if we do not carefully consider the important next steps in the adoption of the SoCal Greenprint. Together we believe we can get to a place where all parties stand in support of the SoCal Greenprint and look forward to achieving that with your team.

Regards,

A handwritten signature in black ink, appearing to read 'Jeff Montejano', is written over a horizontal line.

Jeff Montejano
CEO, BIASC

SCAG's "Greenprint" Disclosure of 166 Datasets

“Greenprint” Created by Anti-Development Advocates in SF Bay Area

SCAG’s proposed adoption of “Greenprint” as a regional tool to plan for development and conservation appears to be an unprecedented public agency embrace of this NGO Advocacy Tool

SCAG's Connect SoCal Plan (2020)

- “Greenprint” does not appear in Executive Summary or Actual Plan
- “Greenprint” appears in an Appendix to Plan: “Natural Lands and Farm Lands Conservation as a “mapping tool””
- “Greenprint” included as Mitigation Measures in the Program EIR for Connect SoCal to help prioritize preservation of high value
- SCAG Staff reported to GLUE Council that Greenprint is “**merely a data tool to advance the pace and scale of voluntary conservation**”
- SCAG Staff “hearing” announcement to “stakeholders” described Greenprint as maps to “**make it easier to integrate nature into the future planning and development of the Southern California region**”

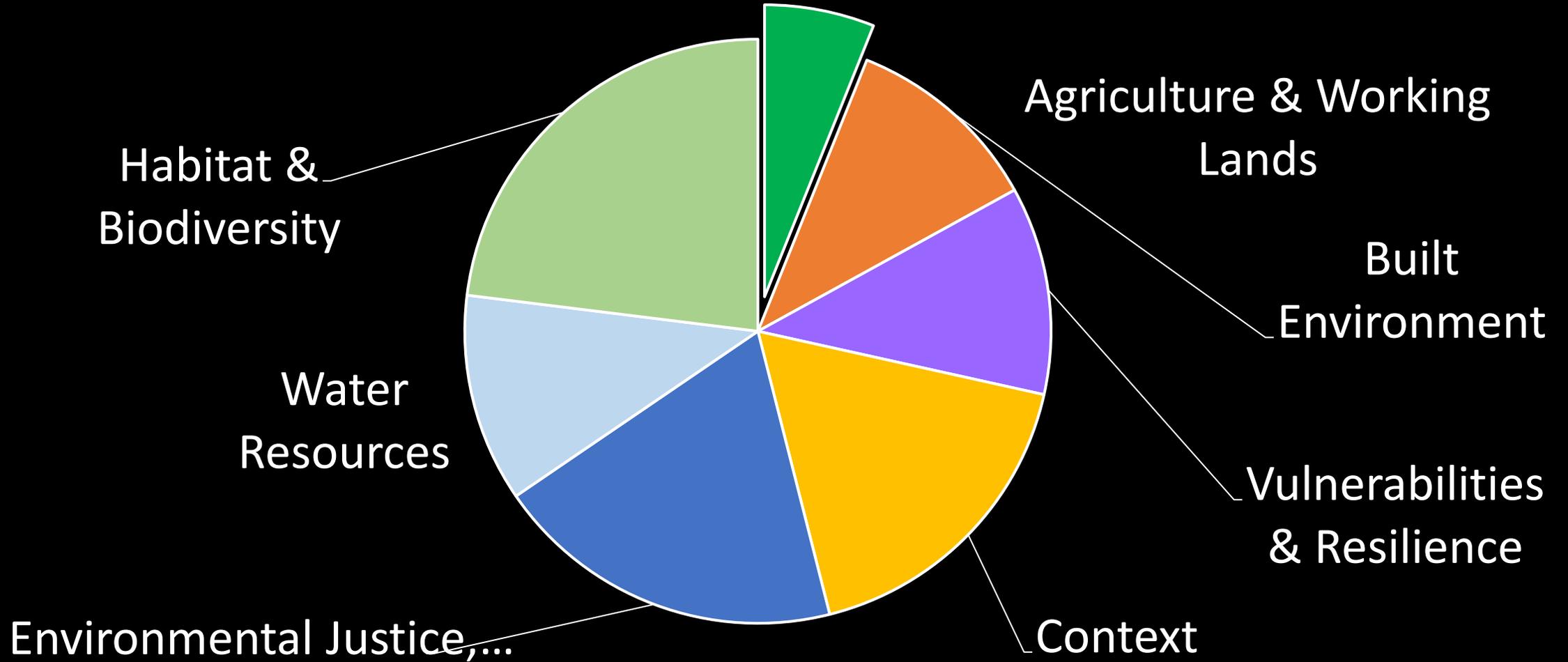
“Stakeholder Outreach” for Greenprint

- No disclosure of actual content of Greenprint until nearly August 2021
- Concerns raised by housing and other stakeholders ignored (2020-21)
- Issue elevated to Regional Council which voted to “pause” Greenprint
 - Pre-RC Vote, Staff proposed “next steps” to adopt Greenprint (p. 14 of RC Presentation)
 - Staff nevertheless continued its Greenprint, re-naming outreach mtg as “hearing”

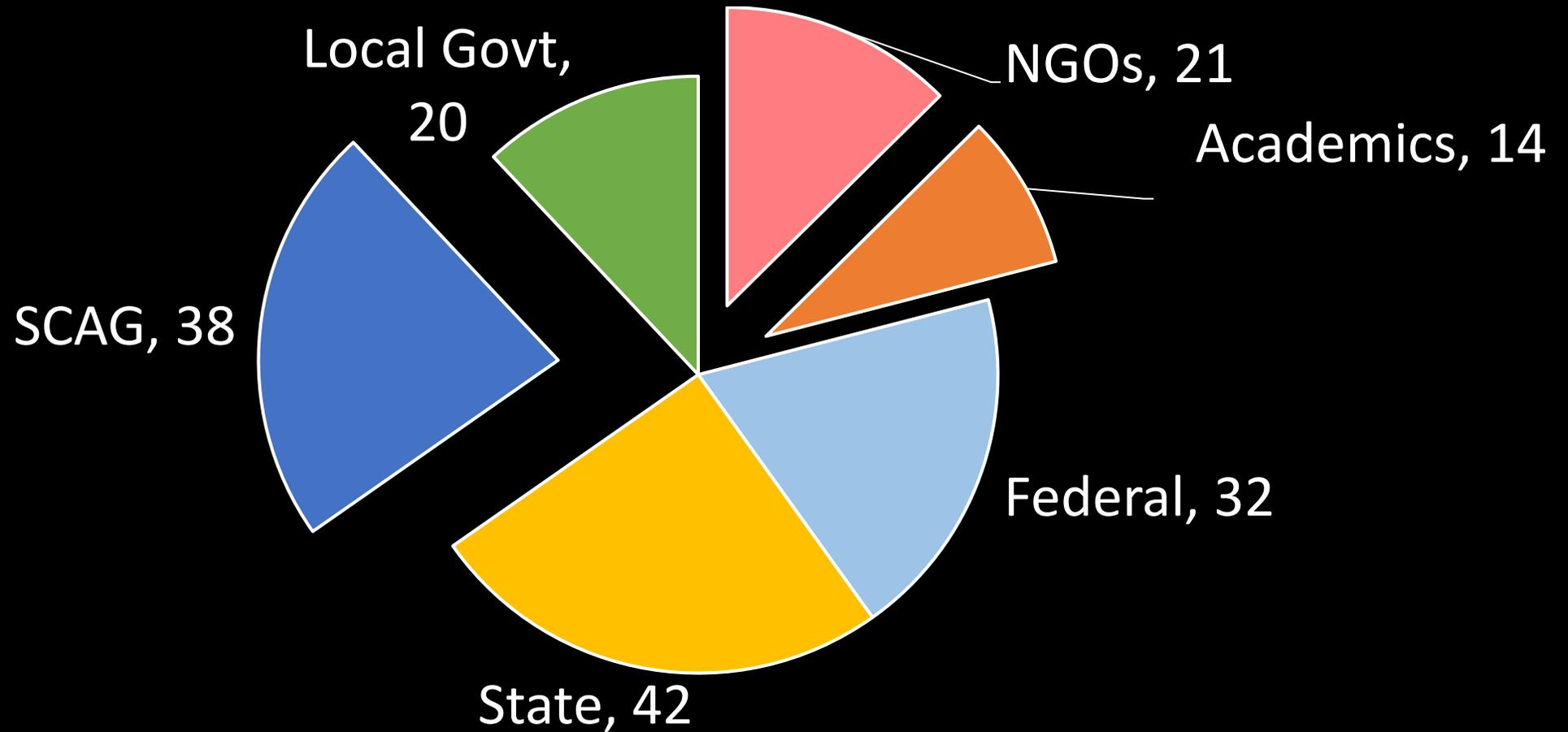
SoCal Business Coalition & Greenprint

- Consistent Business Coalition Perspective:
 - Support need for “Greenprint” per Connect SoCal
 - “Greenprint” cannot undermine local land use control or create litigation tools against approved local General Plans, zoning, & projects
 - SCAG’s “Greenprint” should help identify priority Agriculture and Biological Resource Mitigation locations as required by the Connect SoCal PEIR

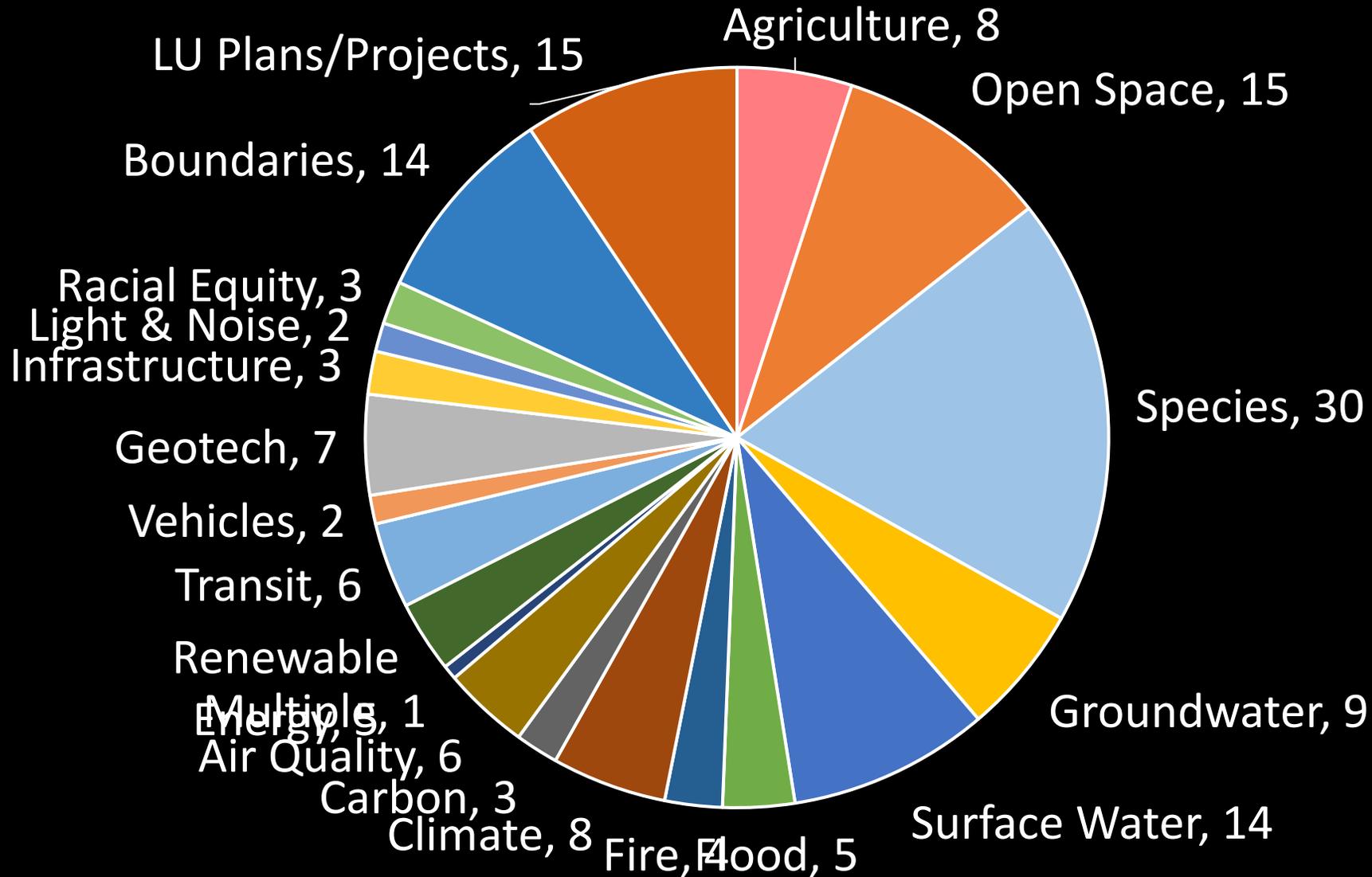
Staff-Proposed 166-Dataset “Greenprint”



Sources of 166 Greenprint Data Sets



Topics Covered by 166 Datasets



Recommended Approach (Fast-Track Option 1)

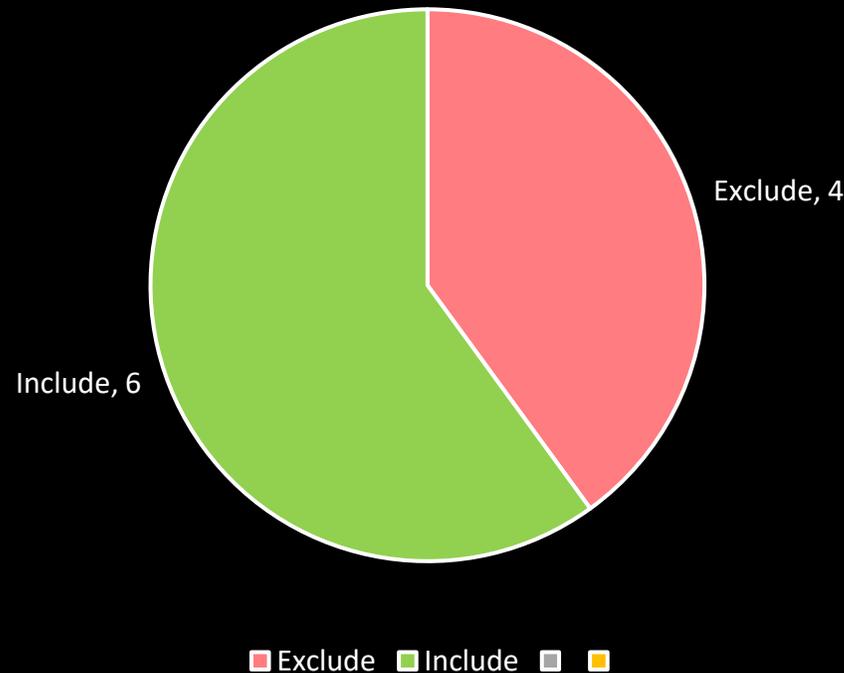
- Use “Greenprint” to map attributes of lands designated for Agriculture and/or Open Space Uses by counties or cities in the Sixth Cycle Housing Element/General Plan Update
 - Consistent with Greenprint Description and Connect SoCal Plan Placement in Agricultural and Working Lands Appendix to guide future development in Agricultural and Working Lands
 - Implements Program EIR references to Greenprint for Agricultural and Biological Resources Mitigation Measures
- Avoids conflict with locally-approved General Plans, zoning or projects
- Avoids creation by SCAG of new CEQA litigation tools for opponents of approved General Plans, zoning and projects

Option 2: Dataset Slog to Right Size “Greenprint”

- Datasets elevated by SCAG into “Greenprint” undermine local control and create CEQA litigation risks
 - Example: Antelope Valley Resource Conservation Investment Strategy
 - Opposed by Los Angeles County Counsel
 - Anti-development areas conflicted with development area approvals in General Plan and Area Plan approved by Board of Supervisor
 - New, non-regulatory analytical methodologies and criteria created legal re-opener risks for certified County Environmental Impact Report (EIR)
 - Opposed by Project Sponsor
 - New, non-regulatory analytical methodologies and criteria were factually incorrect and conflicted with CEQA-required and agency-approved methodologies/criteria
 - Used by project opponent to block General Plan compliant housing project approvals at Planning Commission, Board of Supervisors, and in CEQA lawsuit
- Most litigious anti-housing NGO in California supports “Greenprint”

Agriculture & Working Lands: 10 Datasets

Include or Exclude Dataset?

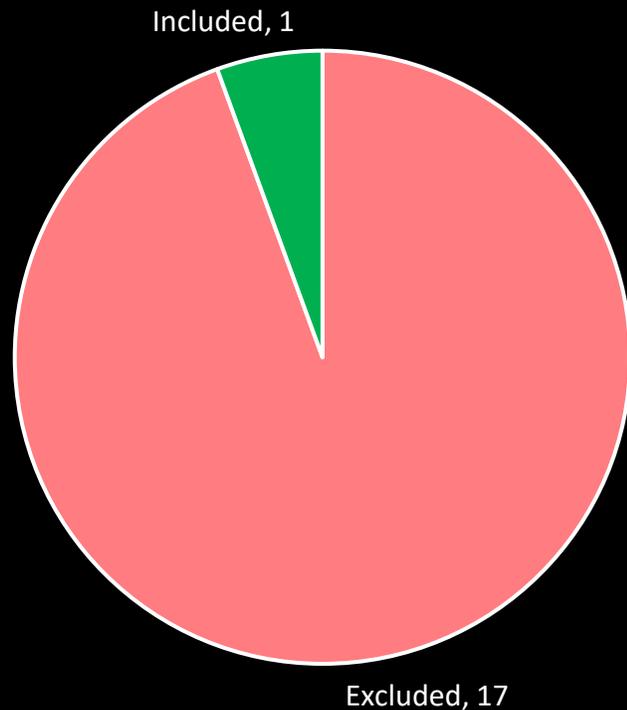


Dataset Exclusion Criteria

- 3 Excluded Datasets include criteria not required to be considered by CEQA or land use planning law, with a high potential to create a CEQA re-opener litigation risk for opponents to approved General Plans, zoning, and projects
 - “Soil Agricultural Groundwater Banking Index”
 - “Climate Water Deficit”
 - “Soil Irrigation Capacity”
- 1 Excluded Dataset with high likelihood of conflict with approved General Plan/zoning/projects
- **ALL Excluded Datasets acceptable IF Greenprint boundaries are approved Agricultural/Open Space GP/Zoned Lands**

Vulnerabilities & Resilience: 19 Datasets

Include or Exclude Dataset?

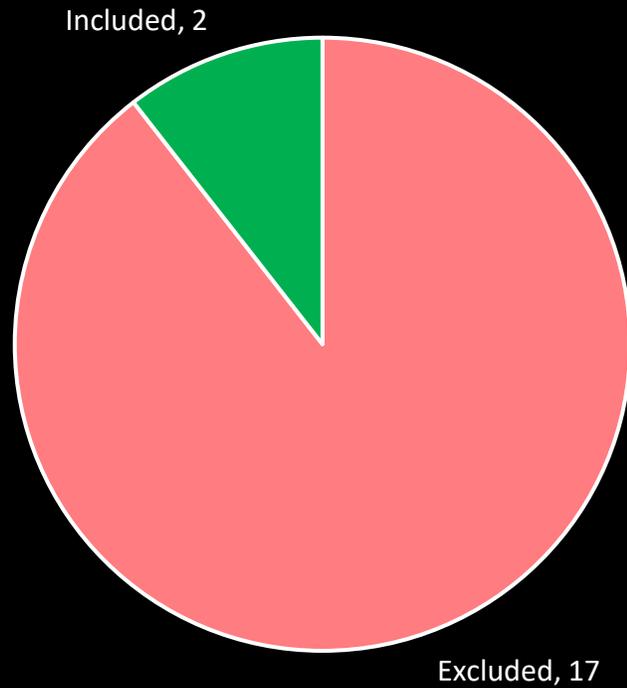


Dataset Exclusion Criteria

- Likely/potential conflict with approved Housing Element Update, General Plan, zoning, or project
- Not required by CEQA; likely re-opener and/or opponent lawsuit challenge claim as “significant new information” not adequately considered
 - Greenprint as new SCAG plan/policy
 - SCAG-endorsed science and use of dataset criteria

Built Environment: 18 Datasets

Include or Exclude Dataset?

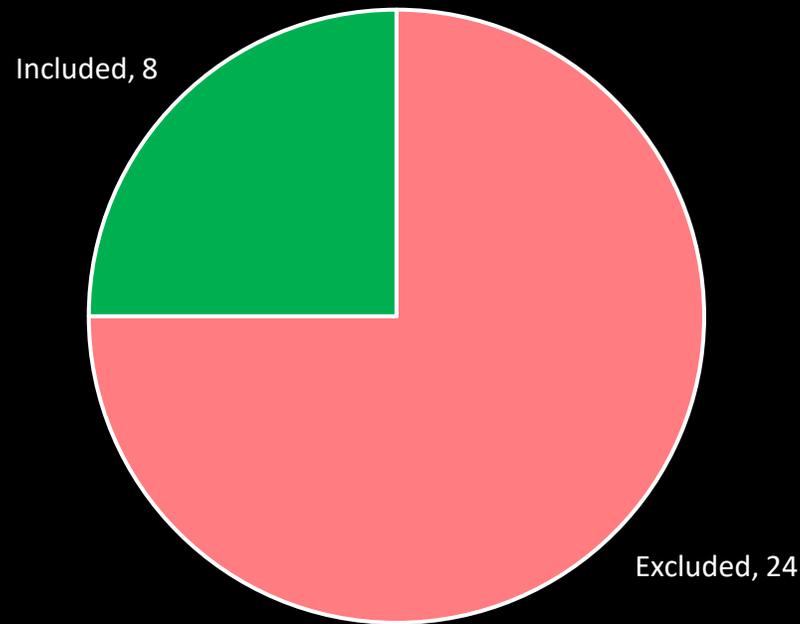


Dataset Exclusion Criteria

- Likely/potential conflict with approved Housing Element Update, General Plan, zoning, or project
- Not required by CEQA; likely re-opener and/or opponent lawsuit challenge claim as “significant new information” not adequately considered
 - Greenprint as new SCAG plan/policy
 - SCAG-endorsed

Environmental Justice: 32 Datasets

Include or Exclude Dataset?



Dataset Exclusion Criteria

- Likely/potential conflict with approved Housing Element Update, General Plan, zoning, or project
- Not required by CEQA; likely re-opener and/or opponent lawsuit challenge claim as “significant new information” not adequately considered
 - Greenprint as new SCAG plan/policy
 - SCAG-endorsed

Built Environment: 18 Datasets

Include or Exclude Dataset?

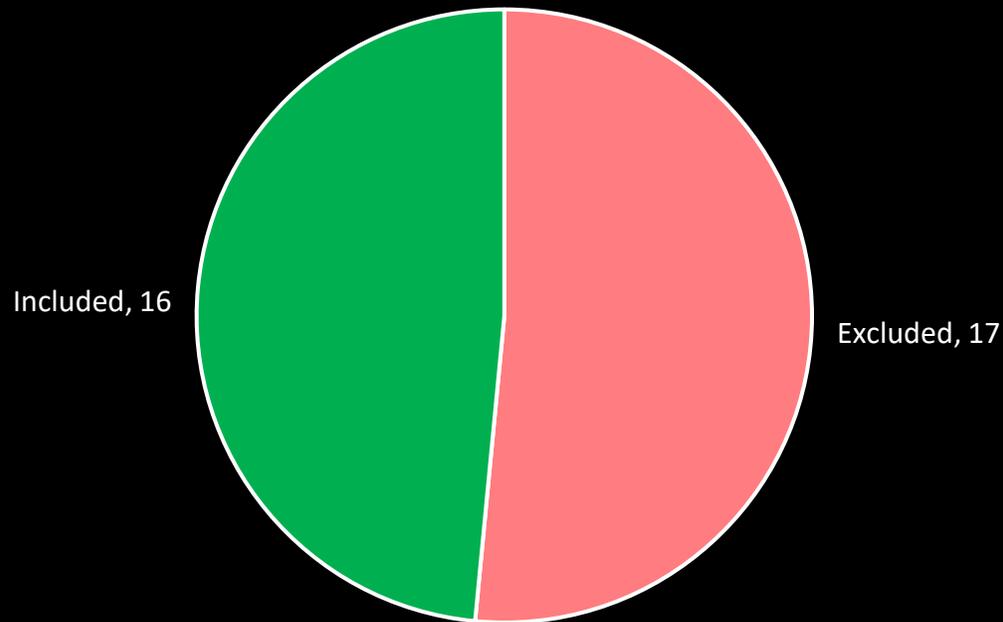


Dataset Exclusion Criteria

- Likely/potential conflict with approved Housing Element Update, General Plan, zoning, or project
- Not required by CEQA; likely re-opener and/or opponent lawsuit challenge claim as “significant new information” not adequately considered
 - Greenprint as new SCAG plan/policy
 - SCAG-endorsed

Habitat & Biodiversity: 38 Datasets

Include or Exclude Dataset?

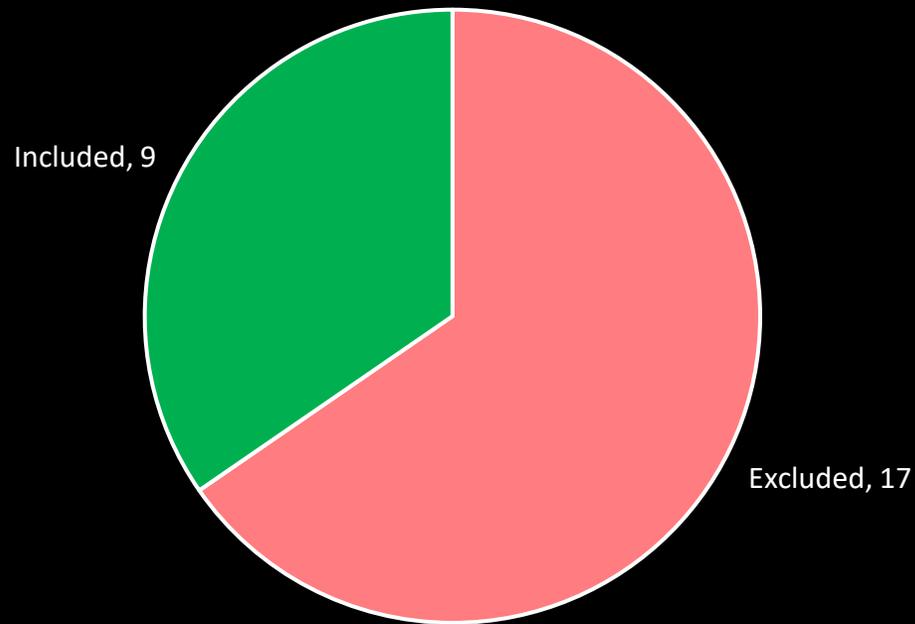


Dataset Exclusion Criteria

- Likely/potential conflict with approved Housing Element Update, General Plan, zoning, or project
- Not required by CEQA; likely re-opener and/or opponent lawsuit challenge claim as “significant new information” not adequately considered
 - Greenprint as new SCAG plan/policy
 - SCAG-endorsed

Water Resources: 19 Datasets

Include or Exclude Dataset?



Dataset Exclusion Criteria

- Likely/potential conflict with approved Housing Element Update, General Plan, zoning, or project
- Not required by CEQA; likely re-opener and/or opponent lawsuit challenge claim as “significant new information” not adequately considered
 - Greenprint as new SCAG plan/policy
 - SCAG-endorsed

Option 3: Hybrid - “Data” not “Greenprint”

- 38 of 166 Datasets are already on the SCAG website – just not “Greenprint”
 - Includes SoCal Connect Plan, various Plan sub-parts (Transit Corridors etc.)
- Federal/State/Local non-Greenprint content can go onto SCAG website but be excluded from “Greenprint”
- NGO and Academic Datasets should not be elevated into the SCAG website OR Greenprint



September 21, 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 Southern California Association of Governments 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:

The City of Irvine would like to express our concerns about the Southern California Association of Governments staff's problematic development of the SoCal Greenprint. Over the past several months, a diverse coalition of business and community interests have expressed concern over SoCal Greenprint on a variety of issues and while we support the public comments and concerns expressed by both the building industry and business coalition, the City would like to outline some additional concerns from a jurisdictional perspective.

At the July 2021 meeting and as a member of the Regional Council, I 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. Part of the motion included a request for a public hearing on the item. A "public hearing" held on Tuesday, August 24, 2021 that I was unable to attend had only a handful of Regional Council members in attendance and I do not believe this satisfies the motion's request for a "public hearing" as it was not widely advertised to all interested technical staff or Regional Council members.

The City has consistently expressed concern with SCAG's creation of a centralized open data platform, including SoCal Greenprint, and we continue to request that the data being utilized accurately reflects the jurisdiction's adopted General Plan. We oppose a seemingly rushed and poorly vetted Greenprint development process, which seems sure to result in a problematic Greenprint. This would undercut efforts to provide sufficiently robust job, infrastructure, and housing opportunities in the years and decades ahead. It would make our local governments' challenges even more daunting, and could inadvertently hand housing opponents the ammunition to delay and prevent greatly needed housing projects.

The City respectfully submits the following general concerns and questions regarding the overall SoCal Greenprint project.

- How do jurisdictions reconcile local General Plan data sources and analyses that were used for General Plan Environmental Impact Report (EIR) analyses, including any output from the SoCal data sources? Is the SoCal dataset envisioned to be recommended for use for environmental analyses and subsequent mitigation? What happens if the data conclusions conflict with local analyses?
- How does the data output and any value statements from SoCal Greenprint mesh with a local jurisdiction's policy framework, especially if there is not consistency?
- There is concern that some of the data sources in SoCal Greenprint do not just identify data, but simply propose a best management practice, as a future course of action. SCAG should disclose how all policy implications of SoCal Greenprint data tools were derived.
- Will SoCal Greenprint be used or referenced by SCAG as part of the Intergovernmental Review Program (IGR)?
- 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 have since 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 unwise at best 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 in the adopted 2020 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) "Connect SoCal" 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 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 (potentially 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.

The City reviewed the majority of all 166 data sets and has already identified a significant number of broken links that do not provide any relevant data, links that require a log-in, links or data that was removed as of August 31, 2021, and links that direct the user to a general website for a department or agency that has no relevant data. Noticing the high percentage of errors or issues with the individual data sets, the City is concerned that there has been little to no quality control.

Additionally, the City has identified the following data sets that contain significant errors previously identified by the City:

- Dataset #24 Entitlements (2018): It is noted that this dataset is not comprehensive, as it only includes volunteered information from jurisdictions. The SCAG entitlement dataset is only updated every four years as part of the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Local jurisdictions should be the only source of entitlement data and at a minimum this should be updated on an annual basis.
- Dataset #77, #78, #79 CalEnviroScreen Pollution Burden, CalEnviroScreen Percentile, and Disadvantaged Communities: The City of Irvine has reached out to the California Office of Environmental Health Hazard Assessment (OEHHA) over the past several years to update its data for the City. Specifically, OEHHA is utilizing outdated information from the Department of Navy and demographic information from the 2010 Census that does not reflect the recent development

throughout the City. As we have noted before, the data sets should include a disclaimer alerting users that the data has not been vetted or approved by local jurisdictions and might not reflect the most up to date information.

- Dataset #98: Environmental Justice Areas: Areas throughout the City of Irvine have been identified in this data set by SCAG staff as an Environmental Justice Area based ONLY on the fact that a non-white population is the majority ethnicity. According to the description of this data layer on SCAG's webpage, "Environmental Justice Area Traffic Analysis Zones (TAZs) were identified if they had a higher concentration of minority population or households in poverty than is seen in the greater SCAG region." While it is important to identify areas with minority populations, it is also critical to include other factors, including access to schools, parks, and services and household income. There also needs to be recognition of historic ethnic settlements and neighborhoods that are culturally based decisions rather than generalized assumptions based on one indicator.
- Dataset #102: High Quality Transit Areas (HQTAs): The City has repeatedly stated this concern, through written and verbal disagreement, with the use of the 2045 High Quality Transit Areas (HQTAs) throughout the 2020 RTP/SCS and the Regional Housing Needs Assessment (RHNA) process. Specifically, several HQTAs identified in the 2045 data are associated with two Bus Rapid Transit (BRT) routes that are hypothetical and are in the earliest of planning stages. To date, the Orange County Transportation Authority (OCTA) has not vetted the proposed BRT station stops along the Interstate 5 corridor with the City of Irvine and the BRT station stop along State Route 55 had been introduced despite concern expressed by City of Irvine staff. The HQTA stops at Alton Parkway, the Jeffrey Road Park and Ride, and Spectrum Center were provided to SCAG by OCTA without consultation with the City of Irvine. While the City understands the inclusion of these hypothetical HQTAs by OCTA for funding purposes in the 2020 RTP/SCS, they should not be included in SoCal Greenprint. Instead, the HQTA data posted should be consistent with other transportation data and should be based on the 2016 base year data.
- Dataset #103: Transit Priority Areas (TPAs): Consistent with the comment for dataset #102, any transportation or transit data should be based on the 2016 base year data, not 2045 due to the hypothetical nature of the projects identified as HQTAs or Transit Priority Areas (TPAs).

Based on the comments and concerns listed above, 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 permanent open space/agricultural land.***
- 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. 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 may 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.¹ 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 potential 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 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 opponents of land uses to undermine and negate plans and approvals based on endless 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

¹ 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."

data sets. In this way, additional data could be made available, but without any prejudicial effect under CEQA. The data sets that are being preferred by various non-governmental organizations and academics for potential inclusion should be excluded, especially, if they were compiled and published without undergoing the necessary public participation processes that governmental agencies must administer.

If SCAG refuses 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.² 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 are not adequately addressed, 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 throughout the region, will create an infinite number of potential CEQA challenges to development, infrastructure, and housing.

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. Additionally, anything related to the SoCal Greenprint process should be labeled with a disclaimer indicating that the data included in the Greenprint includes data that has not been vetted by jurisdictional staff, is not updated regularly, and may include abstracts or journal articles written to reflect the opinions of the

² 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.

President Clint Lorimore and Regional Council Members

September 21, 2021

Page 7

author. Users of the SoCal Greenprint should be advised to contact member jurisdictions for the most updated information.

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,



Hon. Michael C. Carroll
Regional Councilmember District 14

Ec: Marianna Marysheva, Interim City Manager
Pete Carmichael, Director of Community Development
Tim Gehrich, Deputy Director of Community Development
Kerwin Lau, Manager of Planning Services
Marika Poynter, Principal Planner
Kome Ajise, Southern California Association of Governments Executive
Director
Marnie Primmer, Orange County Council of Governments Executive Director
Adam Wood, Building Industry Association of Southern California
Jennifer Hernandez, Holland & Knight



September 24, 2021

Hon. Clint Lorimore
Mr. Kome Ajise
Mr. Michael Houston
Southern California Association of Governments
900 Wilshire Blvd., Ste. 1700
Los Angeles, CA 9001

RE: Greenprint Technical Meeting of September 13, 2021

Dear SCAG Leadership:

On September 13, 2021 the undersigned members of the Building Industry Association of Southern California (BIASC) and the Building Industry Legal Defense Foundation (BILD) met to gain a better understanding of the political purpose, policy scope and intended use of the 166 datasets that appears on the SCAG website under the label, “Greenprint.”

As background, and as you know, our respective groups and other business organizations support the completion of a version of “Greenprint” that applies to the open space and agricultural lands as designated in city and county General Plans. Per our conversation, we agree the “Greenprint” is required by the Connect SoCal Program EIR mitigation measures to identify and prioritize for voluntary conservation of higher quality biological resources and agricultural lands.

We fundamentally disagree, however, that SCAG staff should promulgate a “Greenprint” that could be used by activist organizations to file lawsuits opposing city and county General Plans (including updated Housing Elements) or the approval of housing, infrastructure, and other projects that comply with such General Plans. Greenprint’s inclusion of datasets that have not been publicly vetted or validated, and were invented by NGOs or academics that include litigious activists, and SCAG staff’s decision to apply “Greenprint” to city and county lands that have already been approved for development, remains unacceptable.

As explained by the then Los Angeles County Planning Director, in the context of just one of the datasets included in Greenprint, (which – like Greenprint – was created almost entirely from a self-selected group of NGOs with a business or political agenda to oppose development), applying

Greenprint datasets to lands approved for development is a fundamental “conflict” with the planning decisions of locally-elected officials. (See Attachment 1)

The entire region is charged with creating more than 1.3 million new housing units, with associated infrastructure and public services, in only 8 years. Cities and counties have barely completed the mandatory Regional Housing Needs Assessment (RHNA) General Plan Housing Element update process to accommodate this state-mandated growth, and – as an activist supporter of Greenprint testified at a SCAG comment meeting on Greenprint – local governments and developers can be persuaded through Greenprint to “change their minds.” SCAG staff is using Greenprint as a top-down planning effort to thwart local control.

Our concern with SCAG staff’s top-down planning and rejection of local control is not new. In 2020, for example, our team discovered that SCAG staff and consultants who are also working on Greenprint had created Traffic Analysis Zone (TAZ) maps in Connect SoCal that rejected up to 90% of “local input” from city and county General Plan-compliant growth projections. Our discovery of this dramatic SCAG staff rejection of “local input” required the Regional Council to direct a “pause” in the Connect SoCal schedule. This ultimately resulted in a Regional Council-approved prohibition on the use of TAZ maps for any purpose (including but not limited to CEQA) as well as a recognition of the need to reconcile conflicts between state housing and climate laws that were prioritized as part of the SCAG legislative agenda.

SCAG staff and Greenprint NGO consultants did not, unfortunately, learn the TAZ map lesson. Our concerns with this year’s proposed “Greenprint” is even more foundational than last year’s TAZ maps. What our team took away from the “technical” meeting was that SCAG staff still did not provide a clear or consistent explanation of how “Greenprint” was created or is intended to be used, and Greenprint is fundamentally about top-down versus local input politics and policy, and not technical or legal details.

Here are the team’s highlights of the technical team meeting.

Meeting Duration and Discussion Scope

Approximate 50 minutes of the 1 hour/10-minute meeting included differing SCAG staff explanations of Greenprint, with the remaining few minutes spent on a discussion of 3 of the 166 datasets.

Greenprint Staff Presentation

Kimberly Clark explained how Greenprint was created, and Greenprint’s scope and purpose. Chief Counsel Michael Houston contradicted Ms. Clark on several occasions and on Friday, September 17, Mr. Houston sent a follow-up email addressing several issues which are also discussed below. Ms. Clark explained that the criteria used to select the 166 datasets were based on two factors: 1) the datasets were required to be “publicly available” and 2) not be “new information.” Both issues are addressed below.

The datasets were then approved for inclusion in Greenprint by a “Science Advisory Committee” selected by The Nature Conservancy and SCAG staff; there was no application, public notice,

diversity, commitment to achieving the region’s housing, infrastructure or economic goals, or process of any kind for this Science Advisory Committee.

Finally, as explained by Ms. Clark at the beginning of the technical team meeting, **SCAG intended that Greenprint would include “factors that stakeholders would need to consider in their decision-making” such as “climate resilience” and “environmental justice.”** The use of Greenprint to satisfy the biological and agricultural priority mitigation measures in the Program EIR were not mentioned.

Regarding the two aforementioned criteria factors:

1) Numerous Greenprint Datasets Included in the SCAG Greenprint Spreadsheet of 166 Datasets Failed SCAG’s “Public Availability” Criteria

Our technical team spot checked about 60 datasets (reported as website addresses by SCAG staff on the Greenprint SCAG website), and found more than two dozen datasets that directed members of the public to:

- a) Datasets that did not exist at the website address provided by SCAG, including “broken links” and “website not found” addresses
- b) Datasets that could not be found on the website address provided, including links to organizational or general websites that did not indicate the location of the dataset included in the SCAG dataset EXCEL spreadsheet
- c) Datasets that could only be accessed by “authorized users”
- d) Datasets that required costly and unusual software to open or use
- e) Datasets that had already expired with direction that these not be used
- f) Links to articles or reports that did not include datasets

During the call, our team had time to identify only one of these datasets that failed SCAG’s public availability criteria (Dataset #2), which had one broken link and a second link providing access only to “authorized users.”

Disturbingly, after the technical team call, SCAG staff revised at least some of the dataset links in its online version of “Greenprint” to address, in part, this public availability deficiency, but these modifications to the Greenprint datasets were not disclosed on the Greenprint website or in Mr. Houston’s follow-up email to our technical team. This lack of transparency and disclosure has been, and continues to be, a significant ongoing problem with SCAG’s Greenprint.

- 2) “New Information” Datasets.** Although SCAG staff asserted that the datasets had been screened and included no “new information,” SCAG’s only apparent screening factor was the date the dataset was created – not the extent to which, as the business coalition has repeatedly explained, the datasets as endorsed by SCAG and included in a SCAG environmental policy document called “Greenprint” could be used in a CEQA lawsuit to sue a city or county for

approving a plan or project without considering the “significant new information” created by SCAG in its “Greenprint” of – as Ms. Clark explained – “factors that stakeholders would need to consider in their decision-making.” However, dozens of the Greenprint datasets exist only as the “criteria” that TNC and other activists want to require cities and counties to consider as SCAG-endorsed “Greenprint” factors, and not those that cities and counties are required to consider under CEQA, land use law, environmental law, transportation law, and the myriad of local considerations that elected officials take into account when adopting and implementing General Plans, housing elements, and other projects.

As an initial matter, it is important that SCAG staff refused to even disclose the Greenprint datasets until ordered to do so as part of the “pause” ordered by the Regional Counsel. As noted above, this “disclosure” process was flawed because many of the datasets were in fact not publicly accessible. SCAG also failed to disclose how these should be used, but nevertheless was adamant in the technical meeting that none presented what in SCAG’s view was “new information.” The technical team only got through the first three of these datasets; here are just a few of the extraordinarily problematic additional datasets that provide a major boost to those seeking to sue cities and counties for CEQA failings:

- a) **“Dataset 42” is from the activist group, Union of Concerned Scientists,** which developed a journal article showing “rapid, widespread increases in extreme heat that are projected to occur across the country due to climate change. First, this is not a dataset – it’s a journal article. Second, the criteria used by this activist group have not been vetted, endorsed, or adopted by a public agency under CEQA or any other law – yet SCAG’s “Greenprint” would elevate this into a “factor that must be considered by stakeholders” according to SCAG’s staff. The fact that Environmental Impact Reports (EIRs) certified by cities and counties did not consider this “factor that must be considered” provides a ripe opportunity for an opponent to sue a city or county for failing to recirculate a revised EIR that includes this “new” Greenprint factor.
- b) **“Dataset 128” is from the Nature Conservancy** and is another journal article (not dataset) that “assesses whether a coastal area is vulnerable, resilient, adaptive or other” as a “measure the resilience of coastal climate areas to climate change.” SCAG’s elevation of this into “Greenprint” is another example of a SCAG-staff created opportunity to successfully sue a city or county under CEQA since “Greenprint” includes “significant new information” about climate change risks not used even recent EIRs, which do not generally elevate activist advocacy journal articles into a factor for determining whether a project would expose future occupants to a significant climate change risk.
- c) **“Dataset 104” is from the “Urban Displacement Project” underway at UC Berkeley,** which uses “housing and demographic data from the US Census, and real estate market data from Zillow, to classify a metropolitan area’s census tracts into eight distinct categories. Each category represents a stage of neighborhood change, although should not be taken to represent a linear trajectory or to predetermine neighborhood outcomes.” The categories include, for example, “danger of gentrification” and “exclusivity” and “displacement”. The website for this data set includes the following disclaimer/warning, quoted verbatim: “These maps have not been groundtruthed to verify accuracy in

accordance with UDP's methodology and therefore cannot be officially endorsed by the UDP." If this unverified dataset is elevated by SCAG into "Greenprint," this dataset presents a treasure trove for those seeking to sue cities and counties for having insufficiently considered affordable housing and environmental justice under state general plan laws – and CEQA.

- d) **“Dataset 125” is another unique new Nature Conservancy work product** that “combined the sites and linkages identified by the combination of resilience, flow, and biodiversity into a single network. . . .By building the network around the natural flows and pathways that allow species populations to shift and expand and then identifying representative resilient sites situated within those pathways, the network is specifically configured to sustain biological diversity while allowing nature to adopt and change.” This was another broken SCAG link, so not even disclosure has occurred – and of course SCAG's elevation of this TNC biological assessment methodology into Greenprint is a new CEQA litigation hook for those seeking to sue cities and counties, and block projects.
- e) **“Dataset 119” is the creation of the “Antelope Valley Regional Conservation Investment Strategy Steering Committee,” eventually adopted after it was near completion by a small open-space agency, and purports – like Greenprint – to be benign data to help strategically identify priority biological resource mitigation lands.** This AVRCIS includes many of the same activist organizations as Greenprint, including SCAG sole-source contractor Nature Conservancy and strong Greenprint supporters (and frequent CEQA litigants against cities and counties) Center for Biological Diversity and Endangered Habitats League. The AVRCIS was designed, however, to conflict with and undermine the Los Angeles County Antelope Valley Area Plan – more than 10 years in the making – which vastly increased designated open space lands but also identified three priority “economic opportunity areas” (EOA) to accommodate the region's housing, economic, infrastructure, and economic development needs. The AVRICS, like the many other NGO-created “Greenprint” datasets, invented new factors, criteria and methodologies – which undermined, and flatly contradicted, County-approved EIRs with the goal of stopping development in these three locations (one of which included Centennial). The County's Planning Director, and staff, identified this irreconcilable conflict and repeatedly demanded that the AVRCIS exclude the EOAs that had been approved for development – and AVRCIS supporters rebuffed those demands. CBD then submitted an administrative draft of the AVRCIS to the County and demanded that the Centennial EIR (nearly 20 years in the making) be revised and recirculated, and that the Centennial EOA be declared a sensitive ecological area in which no development should occur. The County declined to agree to CBD's demands, and the AVRCIS remains in draft form years later. Stunningly, however, with full knowledge of the havoc CBD caused by weaponizing the AVRCIS as “significant new information” to derail the Centennial EIR, SCAG has included this AVRCIS as a dataset in Greenprint. This AVRCIS dataset is also unique in that SCAG's current chief counsel was the General Counsel for Tejon and wrote several letters objecting to CBD's hijacking of this purportedly “information-only” AVRCIS through CEQA to block the County's approved Area Plan, and eventually the County's approved Centennial project.

All the above are examples of datasets which, if approved for inclusion in Greenprint by the Regional Council, are legally elevated under CEQA into a potent tool for CBD and other anti-housing litigants can use to weaponize CEQA against city- and county-approved plans and projects and thereby undermine local control.

Chronic Lack of Transparency and Disclosure, Intentionally Misleading Reports re Stakeholder Participation in Greenprint.

Members of the business, labor and civil rights communities have, for months, been asking SCAG staff for a clear, stable, complete and accurate description of “Greenprint” – what is it, who decided what it would include, and how is it to be used. During and following the technical committee meeting, SCAG staff has made internally inconsistent remarks – and even given different groups different messages. At the most recent GLUE Council meeting, for example, SCAG staff prepared meeting minutes affirming that Greenprint is a tool to help identify voluntary land conservation opportunities – while to its own “Greenprint” mailing list SCAG staff concurrently described Greenprint as a tool to guide both development and conservation.

Bias and Conflict in Greenprint “Scientific Advisory Committee.”

As recently confirmed by Ms. Clark, the “Science Advisory Committee” made the decision about which datasets, including but not limited to activist NGO and academic datasets, warranted inclusion in Greenprint. SCAG’s sole source contractor, The Nature Conservancy, assembled the Scientific Advisory Committee. Mr. Houston’s electronic transmittal, following the technical team meeting, identified 18 members of the “Scientific Advisory Committee.” The anti-housing activist litigant Center for Biological Diversity, which has sued to block more housing units than any other entity in California in recent years, had a seat on the “Scientific Advisory Committee” table, as did CBD’s co-anti-housing litigant the California Native Plant Society. The Natural History Museum had a seat, as did the “Chaparral Institute” which is “dedicated to preserving what remains of California’s chaparral – the state’s most characteristic, yet most imperiled, native shrubland ecosystem.” <https://californiachaparral.org/> Public agency participation was limited to a few open space and agricultural district employees, with the remaining 18 seats filled by academics. *There was no representation from scientists working in urban, labor, economic development, housing, infrastructure, public health, or public welfare disciplines: this was a group of scientists assembled to further the business interests of sole source contractor TNC in downzoning land planned for development to reduce the cost of acquiring such lands in conservation easements and fee title held by TNC and similarly situated organizations.*

Misleading Claims regarding Membership and the Role of the Greenprint “Strategic Advisory Committee”

Mr. Houston’s transmittal also identified 29 members of the “Strategic Advisory Committee,” but the 5 individuals included on the list from the entire regional business community – all employees or affiliates of the Building Industry of Southern California – had no “strategic” or “advisory” role of any kind. These individuals were invited to participate on zoom calls with TNC that were tightly

scripted and sought participant “input” solely for non-substantive “decisions” like what title should be given to a particular topic area. TNC and SCAG participants on these zoom calls entirely avoided business stakeholder questions about “what is Greenprint’s purpose” and “who is deciding based on what criteria what Greenprint actually is.” To call this a “Strategic Advisory Committee” is affirmatively misleading.

Finally, as is the case with the Scientific Advisory Committee, the Strategic Advisory Committee is comprised of activists (e.g., “Climate First: Replacing Oil and Gas,” “From Lot to Spot,” “Communities for a Better Environment,” “The Wilderness Society,” “Trust for Public Land” and (with 2 members) the “Central Coast Alliance United for a Sustainable Economy” which lists its top work priority as “stopping unjust evictions” <https://causenow.org/content/lucas-zucker>. With the exception of Assemblymember Gomez Reyes (who had a staffer participate,) not one elected official in the SCAG region was a member of this “Strategic Advisory Committee” – even though an activist individual with no entity affiliation with a history of opposing development (Karen Schmidt of Ventura County) was a member. Agency participants were primarily from transportation agencies (Caltrans and regional transportation agencies), which of course was completely appropriate given Greenprint’s required focus on identifying higher quality agricultural and open space lands for biological and/or agricultural mitigation as described in the Program EIR. **Notably, not a single city had any member on the Strategic Advisory Committee.** If the experience of the BIASC “members” is representative, however, this was neither a “Strategic Advisory Committee” nor a committee qualified, or even interested, in advancing the housing, infrastructure, and economic development plans of SCAG’s 197 regions.

Ongoing SCAG Staff Obstructionism and Failure to Disclose Purpose and Intended Use of Greenprint.

As noted by numerous representatives of the business and labor communities during the public meeting on Greenprint (which SCAG staff ultimately acknowledged, after sending mixed messages, was not the “hearing” required by the Regional Council), a spreadsheet list of 166 “datasets” is not a comprehensible description of “Greenprint.” How is the overall dataset to be used, and by whom – and for what purpose, including but not limited to being used by groups like CBD to sue local government to block plans and projects? In and after the technical committee meeting, SCAG staff continued to decline to answer this question.

During the technical meeting, for example, Ms. Clark first said Greenprint identified factors that would “need to be considered by stakeholders” in “making decisions”. Mr. Houston then said Greenprint was no more or less than a loan calculator, where you plug in the cost of a home, interest rate, and other factors – and out pops the mortgage math – which you can choose to use or not. Mr. Houston further said that the business coalition was “doing itself a disservice” by describing Greenprint as a regulation, when it was not. When reminded that no one had ever suggested Greenprint was a regulation, and pressed to explain whether or not Greenprint could be used to sue cities, counties and third parties under CEQA – just as Dataset 119 was in fact used by Greenprint fan CBD against Mr. Houston’s former employer – Mr. Houston declined to respond. At the end of the meeting, Ms. Clark also said she had “misspoken” if she suggested that Greenprint would “need to be considered” and stated its use by any city, county, or stakeholder was wholly optional. Both Ms. Clark and Mr. Houston declined to respond to the question of

whether Greenprint could be used in CEQA lawsuits to oppose city and county approved plans and projects.

In his email following the technical meeting, *Mr. Houston wrote “the analysis of data layers is an ongoing process” – and “descriptions of each data layer as well as source information, methods, and use limitations will ultimately be included in the SoCal Greenprint.”*

Conclusion: Greenprint is at a Crossroads Requiring Regional Council Action.

Connect SoCal identifies the Greenprint as a “multi-year” effort, and the Program EIR for Connect SoCal requires that Greenprint’s only content be aimed at helping prioritize voluntary agriculture and biological mitigation opportunities. As delegated to sole-source contractor The Nature Conservancy, the current version of Greenprint has become distorted into a top-down, urban and rural development planning hodge podge of activist-created anti-development criteria, dataset-free academic journal articles, political boundaries, subsets of Connect SoCal, and county but not city often-outdated General Plans. Greenprint has been created and managed by a flawed and biased group of activists, and an overlapping group of top-down planning SCAG staff members and leaders that used the 2020 Traffic Analysis Zones to reject up to 90% of local General Plan input. Greenprint’s actual content and intended use remain shrouded in conflicting, contradictory, and obstructionist communications with SCAG staff.

In short, Greenprint is at a crossroads, but the crossroads is not a “technical” disagreement as our team learned from last week’s technical meeting with SCAG staff. We continue to support the Greenprint program as identified in the Program EIR mitigation measures for Connect SoCal – to identify priority voluntary mitigation land for agricultural and biological impacts from infrastructure and development. We also note that Connect SoCal does not create any deadline for completing this work, and in fact calls Greenprint a “multi-year” effort.

We believe there are two pathways to proceeding on a mutually-agreeable basis with SCAG staff, but both require a continuation of the current “pause” on Greenprint:

Option A: Restrict Greenprint to Lands Designated by Local Government for Agricultural and Open Space Uses, and Include Only Datasets that are Actually Publicly-Available and Expert-Agency Approved

Option B: Stop and Restart. Develop a “Greenprint” Program under Regional Council Direction that Includes the Purpose, Content, Unbiased Consultant Management, a Representative and Effective Stakeholder Engagement Process, Disclosure of a Comprehensive and Complete “Draft” Greenprint that is Fully Consistent with Certified EIRs (and Locally-Approved Plans and Projects) for Public Notice and Comment, and Final Action by the Regional Council

Finally, this is our second consecutive year in which the business community was first surprised – and then shocked – by the extent to which SCAG staff is engaged in top-down planning activities that are largely concealed from Regional Council and public disclosure and undermine rather than respect the plans and projects approved by SCAG’s city and county members. This is not the statutory or political role of SCAG staff, and we ask that this pattern of behavior cease.

Thank you for your thoughtful consideration.

Sincerely,

Adam Wood
Building Industry Association
of Southern California

Jennifer Hernandez
Building Industry Legal Defense

Andrew R. Henderson
Building Industry Legal Defense

Thomas Mullen
Building Industry Association
of Southern California



Los Angeles County
Department of Regional Planning

Planning for the Challenges Ahead



Amy J. Bodek, AICP
Director of Regional Planning

Dennis Slavin
Chief Deputy Director,
Regional Planning

May 7, 2019

VIA EMAIL TO: Diane.sacks@mrca.ca.gov
Spencer.eldred@mrca.ca.gov
Info@dmca.gov

Desert and Mountain Conservation Authority Board Members

Dear Board Members:

MAY 7, 2019, AGENDA ITEM 11, ANTELOPE VALLEY REGIONAL CONSERVATION INVESTMENT STRATEGY

The County of Los Angeles (County) opposes approval of the Antelope Valley Regional Conservation Investment Strategy (AV RCIS) that is being presented to the Desert and Mountain Conservancy Board this morning and for which you are being advised that the Santa Monica Mountains Resources Conservation Authority is requesting to be the sponsor. The County requests that you not approve said sponsorship.

In Mr. Edmiston's memorandum to your Board seeking sponsorship of the AV RCIS, he indicated that the AV RCIS was developed "in coordination with", among others, the Los Angeles County Planning Department. That statement is not only inaccurate but disingenuous given that the County withdrew from the AV RCIS Steering Committee in November 2017 specifically because the County's comments about the plan were ignored by the steering committee. The County's comments continue to be ignored. In sum, the AV RCIS was developed in contravention of County input, not in coordination with the County.¹

The County pointed out to the AV RCIS Strategy Planning Team in August, 2017 that the AV RCIS was inconsistent with the Rural Preservation Strategy of the Antelope Valley Area Plan (County Area Plan), a plan now-beyond legal challenge, and a part of the County's General Plan. This Rural Preservation Strategy balances priorities for environmental conservation and preservation in the County with the need for development. As part of the strategy, the County Area Plan sets aside three Economic Opportunity Areas (EOAs) in the Antelope Valley located around major infrastructure

¹ The County's prior letters on these issues are attached.

projects planned by state and regional agencies, smartly prioritizing those areas for growth and development. In turn, preservation of vast ecological resources and the rural character of the Antelope Valley is achieved through various strategies in the County Area Plan designed to limit development in the non-EOA areas, such as the strategies related to Rural Town Centers, Rural Town Areas and Rural Preservation Areas. Areas outside EOAs were also significantly down-sized to limit development. Thus, the balance of preservation and development is achieved by concentrating the most intensive development within the EOAs to preserve the open and rural areas outside the EOAs.

In contravention of these policies, the AV RCIS prioritizes some of the EOAs for conservation, a policy in direct conflict with the County Area Plan. The AV RCIS also conflicts with the regional conservation investment strategy legislation, which is to provide guidance not only to conservation groups but to developers for identification of areas for compensatory mitigation. In doing so, an RCIS must consider local land use planning designation and foreseeable development. It is an inherent conflict to designate an area for conservation priority that has already been designated by the local jurisdiction as an area for relatively-concentrated development, such as the EOAs.

Moreover, the County Board of Supervisors recently approved a development project in the West EOA, wholly consistent with its County Area Plan. Thus, the County has moved beyond designation of an EOA, and approved a project in an EOA. Accordingly, that area simply will not be available for conservation and should not be identified as such in the AV RCIS.

In the past, the AV RCIS team responded that its mapping of conservation areas was based on "science." Frankly, the County Area Plan too is based on science, science that is backed by an exhaustive Environmental Impact Report that withstood a legal challenge at the trial court and the Courts of Appeal with the petitioner in that litigation electing not to seek California Supreme Court review. As such, the County Area Plan is final and beyond challenge. The areas preserved already by the County Area Plan policies and strategies not to mention the Tejon Ranchwide Agreement adequately provide for plentiful conservation areas.

While we have not seen a final written AV RCIS, the mapping still reflects EOAs designated as conservation or preservation targets, including the West EOA for which development has already been approved by the County. Thus, the County cannot support the AV RCIS and objects to the Conservancy's sponsorship of the RCIS.

Sincerely,



AMY J. BODEK, AICP
Director of Regional Planning

Desert and Mountain Conservation Authority Board Members
May 7, 2019
Page 3

AJB:lg

Attachments

c: Board of Supervisors (Supervisor Kathryn Barger)
AVRCIS (Terry Watt -Terryjwatt@gmail.com)
CA Dept. of Fish and Wildlife (Ronald Unger – Ronald.unger@wildlife.ca.gov)
County Counsel (Elaine Lemke)
Santa Monica Mountains Conservancy (Joe Edmiston)

AP_05_07_2019_AV_RICS



Los Angeles County
Department of Regional Planning

Planning for the Challenges Ahead



Dennis Slavin
Acting Director

November 6, 2017

VIA EMAIL TO terryjwatt@gmail.com

Antelope Valley Regional Conservation Investment Strategy Planning Team
44811 N. Date Ave., Suite G
Lancaster, CA 93534

SUBJECT: WITHDRAWAL OF LOS ANGELES COUNTY FROM THE ANTELOPE VALLEY RESOURCE CONSERVATION INVESTMENT STRATEGY (AVRCIS) STEERING COMMITTEE

Dear AVRCIS Planning Team:

On August 10, 2017, the County sent a letter requesting changes to the administrative draft of the AVRCIS. These changes reflected the County's serious concerns regarding the AVRCIS' treatment of areas the recently adopted Antelope Valley Area Plan (AV Plan) designates as Economic Opportunity Areas (EOA). The County requested that the AVRCIS exclude these areas for conservation because of the inherent conflict with the adopted AV Plan's policies that designate those same areas for future economic development.

When the California Legislature created RCISs in 2016, it required that a local agency with land use authority be included in the process. The purpose of this requirement was to ensure that RCISs be developed in coordination with local land use plans such that the RCIS is consistent, and not in conflict, with local land use policy. The County's participation has been based on this understanding.

The County recently learned from the September 2017 Desert and Mountain Conservation Authority staff report that the AVRCIS project will move ahead without the changes the County requested. Because the adopted policy for EOAs will thus continue to conflict with the AVRCIS, the County is unable to support the AVRCIS effort and no longer see a purpose for continued participation in the Steering Committee.

Therefore, the County is withdrawing from the Steering Committee. Please be advised that any correspondence henceforth will be submitted as the County of Los Angeles, and not as a member of the Steering Committee.

Sincerely,

DEPARTMENT OF REGIONAL PLANNING
Dennis J. Slavin
Acting Director

A handwritten signature in black ink, appearing to read "Mark Child".

Mark Child, AICP, Deputy Director
Advance Planning Division

DJS:MC:PH:ST/st

Attachment:
Additional comments on the Administrative Draft, AVRCIS (August 10, 2017)



Los Angeles County
Department of Regional Planning

Planning for the Challenges Ahead



Richard J. Bruckner
Director

August 10, 2017

VIA EMAIL TO terryjwatt@gmail.com

Antelope Valley Regional Conservation Investment Strategy Planning Team

SUBJECT: ADDITIONAL COMMENTS ON THE ADMINISTRATIVE DRAFT, ANTELOPE VALLEY RESOURCE CONSERVATION INVESTMENT STRATEGY (AVRCIS) (JULY 2017)

Dear AVRCIS Planning Team:

As you know, the County of Los Angeles ("County") Department of Regional Planning ("Department") has participated on behalf of the County as a member of the Antelope Valley Resource Conservation Investment Strategy ("AVRCIS") Steering Committee. The AVRCIS is a strategy intended to provide voluntary guidance for ways that will enhance the long-term viability of native species, habitat, and other natural resources within the Antelope Valley. This AVRCIS is largely defined as the County portion of the Antelope Valley, and includes the Cities of Lancaster and Palmdale as well as unincorporated County. We consider the County a main stakeholder in the AVRCIS process and had provided a previous comment letter on the administrative draft document in July.

The Los Angeles County General Plan 2035 ("General Plan") was adopted with five guiding principles that emphasizes sustainability, so that the needs of the existing population are met without compromising economic, social, and environmental resources that would be available to future generations.

The Antelope Valley Area Plan ("AV Plan"), adopted as a community-based plan for the Antelope Valley area and a component of the General Plan, relies on a Rural Preservation Strategy to meet the goals and objectives of the General Plan, by balancing priorities for environmental conservation and preservation against the need for development. As part of the AV Plan Rural Preservation Strategy, three Economic Opportunity Areas ("EOAs") were adopted. These EOAs, areas where major infrastructure projects are being planned by state and regional agencies, reflect the County's priority areas for growth and development within the Antelope Valley. In turn, preservation of the ecological resources and rural character of the surrounding areas are achieved through the Rural Preservation Strategy's Rural Town Center Areas, Rural Town Areas, and Rural Preservation Areas.

The AV Plan Rural Preservation Strategy achieves this balance of preservation and development by concentrating development within the EOAs to preserve the open and rural areas outside the EOAs. Areas mapped as EOAs are designated by the County as priority areas for development to occur.

**ADDITIONAL COMMENTS ON ADMINISTRATIVE DRAFT AVRCIS
AUGUST 10, 2017
PAGE 2**

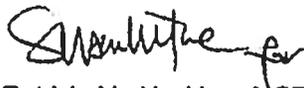
In reviewing the administrative draft of the AVRCIS, it has become apparent that the AVRCIS has chosen to prioritize some of the EOAs for conservation. The County's adopted policy direction for the EOAs thus conflicts with the AVRCIS's designation that prioritizes the same areas for conservation. This designation in the AVRCIS also conflicts with the regional conservation investment strategy legislation, which is to provide guidance for identification of areas for compensatory mitigation and must consider local land use planning designations and foreseeable development. EOAs, through the County's very recent AV Plan process, have been planned for development and not for conservation. To correct these inconsistencies the priority conservation designation in the EOAs under the AVRCIS must be amended to exclude the EOAs. By their function, EOAs cannot be considered areas of conservation priority.

To date, we have not seen a complete final version of the AVRCIS. The administrative draft AVRCIS as well as most recently shared proposed changes provided on August 2, 2017, do not accurately reflect the County's priorities for conservation and in fact, create new issues of concern. Therefore, we respectfully request that a final version addressing our comments be provided to us for our review and further comment before the draft is submitted to the California Department of Fish and Wildlife.

We appreciate being able to participate in the AVRCIS process, as well as developing our working relationship with ICF and the other agencies involved. The County sees the potential for the AVRCIS to be a valuable resource of compiled biological information and a tool to streamline locating areas suitable for mitigation and conservation, and looks forward to continuing our collaboration.

Sincerely,

DEPARTMENT OF REGIONAL PLANNING
Richard J. Bruckner
Director



Patricia Lin Hachiya, AICP, Supervising Regional Planner
Environmental Planning and Sustainability Section

RJB:MC:PH:ST/st



Building Industry Association of Southern California, Inc.

September 28, 2021

Hon. Clint Lorimore
Southern California Association of Governments
900 Wilshire Blvd., Ste. 1700
Los Angeles, CA 9001

RE: Impasse on SoCal Greenprint

Dear President Lorimore:

As a product of our on-going conversations about the SoCal Greenprint, our respective organizations agreed to the formation of an expert small group panel to better communicate the concerns of the home building industry. The first of these meetings occurred on September 13, 2021, and to date, no follow up has been scheduled. Unfortunately, based on this last meeting and more recent developments relating to Greenprint's flawed draft-product and process, our five building industry associations are officially suspending involvement with SCAG until the critical issues with Greenprint are resolved.

In addition, we were shocked to receive notice that a "second" Public Hearing has been scheduled to address the SoCal Greenprint, set for October 7, 2021 at 12:30pm. In a separate communication you will find our Team's lengthy review of the deeply troubling flaws contained in the SoCal Greenprint. **Without significant reform, the SoCal Greenprint will massively expand CEQA liabilities and undermine the local control of your own Regional Council Members.** Proceeding to a hearing without addressing any of these issues is unconscionable.

Based on these findings, SCAG's continual lack of transparency, and in line with the outcome of our first substantive meeting, the Building Industry Association of Southern California does not see a productive path forward with SCAG staff unless/until one of the two proposed Options is implemented.

Option A: Restrict Greenprint to Lands Designated by Local Government for Agricultural and Open Space Uses, and Include Only Datasets that are Actually Publicly-Available and Expert-Agency Approved.

Option B: Stop and Restart, and Develop a "Greenprint" Program under Regional Council Direction that Includes the Purpose, Content, Unbiased Consultant Management, a Representative and Effective Stakeholder Engagement Process, Disclosure of a Comprehensive and Complete "Draft" Greenprint that is Fully Consistent with Certified EIRs (and Locally-Approved Plans and Projects) for Public Notice and Comment, and Final Action by the Regional Council.

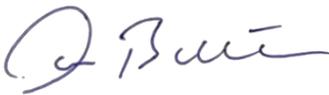
Our concerns were recently validated by a letter from City of Irvine Councilman Michael Carroll, a SCAG Regional Council Member. We hope that this letter is properly shared with all members of the Regional Council and that resolution can be achieved before SCAG staff advances the Greenprint in a way that harms Southern California. Our building, business and labor industry partners are united in finding a resolution to continue forward, but not within Greenprint's existing framework.

We appreciate the improved communication efforts by your leadership and staff. We also recognized and appreciate SCAG's intentions to resolve several previously outlined issues; however, based on SCAG's staff's opposition to any possible amendments, we deem Greenprint negotiations to be unsalvageable. The only remaining path forward is one of the two outlined options above.

Until this Greenprint policy can be amended or restarted, our industry's participation with SCAG in all manners is officially suspended. We look forward to the Board's decision in resolving this major regional planning problem and hope we can collaborate with your organization soon. We would also appreciate responses to our previous written correspondences to ensure communications are continuous and accurate.

Thank you.

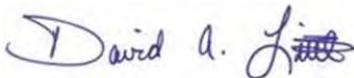
Sincerely,



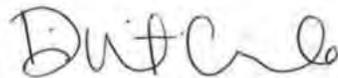
Dave Bartlett, Brookfield Residential
BIA Southern California President



Jeff Montejano
BIASC CEO



Dave Little, Williams Homes
BIA LA/Ventura President



Diana Coronado
BIASC Vice President - LA/Ventura



Sunti Kumjim, MBK Homes
BIA Orange County President



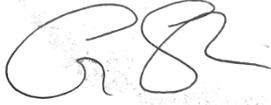
Adam S. Wood
BIASC Vice President-Orange County



Tim Roberts, Brookfield Residential
BIA Baldy View President



Carlos Rodriguez
BIA Baldy View Executive Officer



Greg Shaia
BIA Riverside President



Lou Monville
BIA Riverside Interim Exec Officer



John Russo, Principal
John@SynchroniCITYassociates.com
949.435.9737

7 October 2021

*BRIEF OPINION REGARDING THE LIKELY IMPACT OF SCAG'S PROPOSED
"GREENPRINT" OVERLAY UPON THE CONSTRUCTION OF HOUSING IN
CALIFORNIA.*

Local governments throughout Southern California have recently updated their General Plan documents to account for new political, social, and economic circumstances, the most salient of which is the SCAG developed RHNA mandates. As a former City Councilmember and City Attorney in Oakland, and as City Manager of three very different California cities in three very different parts of the state, I have witnessed – as, I am confident, have all the members of the Regional Council – the challenging and often angry political dynamics that elected decisionmakers must navigate during a General Plan Update. It takes courage to explain to existing residents that their city—or the unincorporated area of their County—must build more housing when voters already perceive that new housing brings more traffic gridlock, crowded schools, and slower public safety emergency response times.

To an incumbent elected official, advocating for new housing construction is politically treacherous. This is for two very simple reasons:

First, very few existing residents ever support the construction of new housing in their area for the reasons I have already stated. Even fewer welcome “affordable” housing into their community due to either



conscious or unconscious racism, and/or a misunderstanding of the range of income levels that are served by “affordable” housing, and/or a fear that the introduction of “affordable” housing units near their home will bring down their home value.

Second, while existing residents are quick to remember -- and punish -- an elected official who votes for housing projects, there is no offsetting reservoir of support for that official among the new residents. These beneficiaries of the elected official’s courageous vote are usually not existing residents of the subject community; therefore, new residents are rarely aware of any controversy surrounding the policy decision to approve their new home. These new residents/voters are even less likely to know who took the political heat/risk to make their new home possible.

To make matters even more difficult for a California City Councilmember or County Supervisor, our state’s irrational, “Rube Goldberg” contraption of a State/Local taxation system renders the construction of most all new housing a long-term net revenue loser for any city or county. The property tax share a city receives from each new unit almost never meets the additional service demand generated by that new housing unit. By state law, any development fees associated with new building construction must be related to impacts and the costs of inspecting the safety of construction and the staffing of the permit and land use process. Some cities have aggressively raised these fees to try to mitigate the long-term red ink that new residential construction adds to all too often already strained budgets.



Understandably, these high fees are resisted by home developers and builders, which sometimes results in litigation. Perhaps of greater import in terms of our statewide housing crisis, these high fees add to the cost basis of each housing unit, making affordability even more elusive to working families.

If voting to approve a specific housing project is a political challenge; voting to approve new RHNA numbers incorporated into a General Plan Update is an elected official's nightmare. At least in the specific project, the housing developer is nearly always paying for what can be a very contentious, litigious, and often expensive environmental review process. And opposition to a specific housing development is commonly limited to the neighborhood in which it is proposed to be built. The politics of General Plan Updates can see the development of alliances among various NIMBY and "environmental" groups who join forces to slow growth.

Nevertheless, the local government agencies in SCAG's service area have paid the price, reworked their General Plans, and incorporated the additional housing units called for by the RHNA mandate.

Metaphorically speaking, the ink is barely dry on these new General Plans and the CEQA documents that were required to insulate these housing requirements from the costly litigation that make housing construction so difficult in California. Compromises were cobbled together among different stakeholders. For the briefest of moments, it



seemed the local governments of Southern California were going to be allowed to do their part to try to mitigate California’s shameful inability to produce housing adequate for the people who live and work here today—and tomorrow.

But then came the “Greenprint”. Either SCAG staff’s view of the world is so bureaucratic that it is blinded to the political and economic realities and obstacles that govern the implementation of housing policy (which I have described briefly above), or worse, SCAG staff understands what Greenprint will do in practice—and supports both a further degradation of local control AND a continued crisis in California’s housing availability.

I am certain that others will elaborate on how the Greenprint process was like a card game in which SCAG acted the role of a dealer who was “dealing from the bottom of the deck.” A no bid process to choose a consultant; approval of the contract on the consent calendar; a rushed process without real consultation with essential stakeholders such as the business community and the groups that would actually build the housing that Southern California desperately needs; 166 data sets, many of which are untested opinion produced by organizations who have been prominent in litigation to stop housing development in California; data sets which have broken links and so could not even be reviewed; staff backdating of documents; a hurried approach to the entire process, notwithstanding direction from the Regional Council to take the time to try to build a consensus; and, finally, a disclaimer that



says the data sets are not binding while staff must know that the data sets can be used --**by the same environmental groups and academics that have produced and, with the partnership of SCAG staff, incorporated them into the Greenprint** – to litigate (relitigate?) the legitimacy of the already finalized General Plan Updates.

In my legal career I have represented the Oakland Nuclear Free Zone campaign, the Citizens for Oakland Open Space, the Green Party of California, and the Alameda County Recycling Initiative Campaign. I was an Environmental Affairs Commissioner in Oakland and President of Friends of Oakland Parks and Recreation. As a Councilmember, I sponsored, fought for, and won passage of new laws, including Oakland’s landmark Creek Protection Ordinance and Oakland’s cutting-edge Integrated Pest Management policy. I stopped the continued use of herbicides in Lake Merritt in favor of aeration produced by simple water fountains.

I list all of this so you will know that I am not unsympathetic to the principles that are said to be the foundation of the Greenprint. However, anything that will make the construction of workforce housing in places where people **already** live, work, shop, and do business –which will be the actual impact of approval of the Greenprint as currently developed by SCAG staff with their allies—is NOT environmentally sound.



Finally, the Greenprint talks about the need to protect food integrity and supply and the protection of open space. With all due respect, California does not have a “Food Crisis” or an “Open Space Crisis”. California’s greatest challenge right now is a HOUSING CRISIS. Passing the Greenprint as it is now will do little to impact Open Space policy, which has improved dramatically in the past 25 years. Nor will passing the Greenprint do anything on the ground to address nutritional deficiencies in so much of our population, which has to do with a lack of education and “food deserts” in economically and socially challenged communities. What the Greenprint **will do** is make the already difficult politics and economics of housing construction even more impossible to navigate. Cities and Counties will be caught between the “Scylla” of the SCAG developed and State of California mandated RHNA numbers, and the “Charybdis” of local opposition to housing -- now buttressed by new litigation to reopen the environmental reviews of local General Plans.

It is, therefore, my opinion, based upon more than 30 years’ experience in California local government, that passage of the Greenprint will worsen the housing crisis, perhaps significantly, by raising both the cost of housing to the buyer AND the already high cost of voting for housing projects to the career aspirations of local elected officials.

Thank you, Regional Council Members, for your public service, which I both honor and revere.

Respectfully,

John Russo

Principal
SynchroniCITY Associates

Dear Ms. Brookover,

I read up on this mapping proposal, and wanted to state my support for it. It would be most helpful in providing another tool in Caltrans land use decision-making, including my field, Biology. If Caltrans mitigation sites can be layered onto this mapping that would also be of tremendous benefit. Thank you,

Paul Caron
Senior District Biologist
213 326-0378

September 30, 2021

ADVISORY BOARD

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

RE: SUPPORT | SoCal Greenprint

Dear SCAG President Lorimore,

As a place-based community organization dedicated to realizing a more sustainable, equitable, and livable San Gabriel Valley, ActiveSGV supports the SoCal Greenprint to create a free, easy-to-use resource for community stakeholders like our organization.

California is in the midst of unprecedented wildfires, extreme drought conditions, worsening air quality, and other serious health and safety challenges. Faced with these crises it is imperative that we advance efforts to accelerate sustainable development and environmental best practices. SoCal Greenprint has the potential to help Southern California along this path. By compiling more than 100 sources of publicly-available data into a tool that helps stakeholders visualize how to build healthier communities, the project can help us make smarter, more cost-effective decisions at the local, regional, and state level.

Given the time-sensitive nature of the challenges facing us, ActiveSGV urges SCAG to keep the SoCal Greenprint on track for a Fall 2021 launch. Time is of the essence. The impacts of the climate crisis are already being felt more severely than forecasted across the state. Improving access to data and information is a simple step SCAG can take to help key stakeholders across southern California make better decisions in the months and years ahead. As a place-based organization focused on some of the most pollution-burdened communities in California, which deals with the outcomes of discriminatory land-use and transportation planning on a daily basis, ActiveSGV finds special value in the inclusion of an equity section that focuses on the unique challenges and needs of these communities. This is especially important as these very communities are also the most susceptible to the impacts of global warming and the least prepared to mitigate its effects at the local level.

We encourage SCAG to advance the SoCal Greenprint project and support cities in making sustainable, equitable development the new norm in southern California.

Thank you,



David Diaz, MPH
Executive Director

ENDANGERED HABITATS LEAGUE

DEDICATED TO ECOSYSTEM PROTECTION AND SUSTAINABLE LAND USE



October 1, 2021

Regional Council
Southern California Association of Governments
900 Wilshire Blvd., Ste. 1700
Los Angeles, CA 90017
scagreenregion@scag.ca.gov, rey@scag.ca.gov

RE: Support for SoCal Greenprint (Oct 7, 2021, Regional Council)

Dear President Lorimore and Councilmembers:

Endangered Habitats League (EHL) commends the Southern California Association of Governments for its vision in developing a regional Greenprint project, and strongly urge you to keep the project on track. For your reference, EHL is a Southern California conservation group dedicated to ecosystem protection, sustainable land use, and collaborative conflict resolution. As noted below, while this database is informational only, and not regulatory, such information is essential for the best decision-making by local government.

Greenprints are data tools that give planners, developers, community members and stakeholders access to already available, publicly vetted and approved data sources in one easy location. Greenprints assist in making smart decisions that support housing, business, and industrial growth while ensuring that natural resources are incorporated into planning for the future. Greenprints are particularly important for historically disadvantaged communities and communities of color that are short on green space.

A natural resource data base benefits all parties. Knowing opportunities and constraints in advance helps developers and local governments alike create more housing and other benefits more quickly.

A vital point is that the public expects elected officials to make *fact-based* decisions. The Greenprint simply supplies objective information and informs the planning process. To deprive you of it—as some are urging—is fundamentally contrary to good government.

Thank you for considering our views.

Yours truly,



Dan Silver
Executive Director

cc:

Kome Ajise, Executive Director, ajise@scag.ca.gov

Clint Lorimore, President, lorimore@scag.ca.gov

India Brookover, Greenprint Lead, brookover@scag.ca.gov

Honorable Clint Lorimore

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

Re: SoCal Greenprint

Hon. Clint Lorimore and SCAG Board of Directors

I am writing in support of the SoCal Greenprint only platform. The American Institute of Architects California declared a Climate Emergency to allow it, at a State wide level, to mobilize rapidly and boldly to address at a policy level the importance of climate action. The SoCal Greenprint's data and sourcepoints will be an invaluable asset to many, including architects, to work and reverse our current climate crisis.

Architecture 2030 has found that to accommodate the largest wave of urban growth in human history, we expect to add 2.4 trillion ft² (230 billion m²) of new floor area to the global building stock, the equivalent of adding an entire New York City to the world, every month, for 40 years. More now than ever we need to make the best informed decisions. This platform can be a beacon, just as previous applications before it, and illuminate the way to optimal solutions and smart growth in Southern California.

As Chair of the AIA Los Angeles Committee On The Environment I strongly support the Social Greenprint. I encourage you and Southern California Association of Government to continue to work and finalize this important tool. We look forward in supporting you on this and other initiatives SCAG has on the horizon and bolster and ensure a sustainable and equitable future.

Yours truly,

Ismar Enriquez, AIA, LFA, LEED-AP

AIA Los Angeles Committe On The Enviornment Chair
Director of Sustainable Design, The Architects Collective

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

Re: SUPPORT for SoCal Greenprint Initiative

Dear Hon. Clint Lorimore and the Board of Directors,

As the Director of Government & Public Affairs for the Los Angeles Chapter of the American Institute of Architects, I am writing to share strong support for the SoCal Greenprint Initiative.

With investment and implementation from SCAG, the [SoCal Greenprint](#) will serve as an important tool for policymakers and civic officials to gain insight into [specific information](#) about the land-sue strategies.

The SoCal Greenprint provides the information and resources we need for the region to make smarter and more reliable decisions that will improve the sustainability of our environment and economic systems while planning for growth. Given the challenges that lie ahead, we know that our planning has to be smarter and focused on protecting our treasured natural resources.

Data can help us make better decisions and Southern California has no time to waste in proactively building for a better future. Heat waves, wildfires and chronic poor air quality have made it clear that climate change is a challenge that requires data, action, and visionary leadership.

I encourage you to support this initiative and to invest in additional strategies and tools that will allow all of us to have greater access to information about our region.

Very truly yours,

Will Wright, Hon. AIA LA
Director, Government & Public Affairs
American Institute of Architects, Los Angeles Chapter
Architecture for Communities Los Angeles
3780 Wilshire Blvd, Suite 701, Los Angeles (Yaangna), CA 90010
O: (213) 639-0764

E: will@aialosangeles.org
www.aialosangeles.org

instagram: [@aia_la](#)
twitter: [@AIALosAngeles](#)
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[subscribe to the AIA LA Newsletter](#)

Hello,

I support the SoCal Greenprint project. We need this interactive tool to make environmentally-sound decisions around land use and transportation. It will not only help conserve our natural resources, it will also help save planners a lot of time by compiling all the data into one convenient location!

LILLIAN CAI

Environmental Planner

California Department of Transportation

100 South Main St., Suite 100

Los Angeles, CA 90012

(213) 312-7543

Laguna Canyon Conservancy
P.O. Box 1383
Laguna Beach CA 92652



Submitted via email to: SCAGGreenRegion@scag.ca.gov

Attn: SoCal Greenprint Team
President Lorimore
Southern California Association of Governments (SCAG)
900 Wilshire Blvd., Ste. 1700
Los Angeles, CA 90017

RE: SoCal Greenprint Support (Public Hearing – Oct. 7, 2021)

Dear President Lorimore:

The Laguna Canyon Conservancy supports the SoCal Greenprint completion. Since 1988, our mission has been to preserve and protect the Laguna Canyon and the 22,000-acre South Coast Wilderness area and other threatened spaces. The Laguna Canyon Conservancy (LCC) is a volunteer environmental group and a 501C4 non-profit corporation, so donations are generally not tax deductible. See website at www.LagunaCanyonConservancy.org

Laguna Beach residents were instrumental in the creation of the Laguna Wilderness complex, which is comprised of local, regional, and state-owned parklands. It is because landowners, like The Irvine Company, chose to sell the acreage that there are now 22,000 acres of preserved natural lands at this coastal city.

Natural lands—especially those adjacent to transportation corridors and cities—offer many health benefits from hiking and biking trails, nature education, birdwatching, and more. Wildlife thrives in these locations and the plants promote clean and water. Understanding the inter-relationship between the natural and built environment is part of sustainable planning, which state legislation now requires.

The SoCal Greenprint offers an opportunity for the public, planners, decision makers, and landowners to learn about the natural and built environment. It does not force a landowner to choose one path or another. It does not remove any rights. The Greenprint simply offers information and increases transparency. There is no implementation tool associated with it either.

In conclusion, the Conservancy supports the Greenprint and urges SCAG to complete it as promised in Connect SoCal.

Sincerely,

A handwritten signature in blue ink that reads "Gayle Waite". The signature is written in a cursive style with a small arrow pointing to the top of the letter 'e'.

Gayle Waite
President
Laguna Canyon Conservancy
949-887-3247/JustWaite@cox.net

Saddleback Canyons Conservancy

P.O. BOX 1022
TRABUCO CANYON, CALIFORNIA 92678



- Preserving Our Canyons -

October 5, 2021

Submitted via email to: SCAGGreenRegion@scag.ca.gov

Attn: SoCal Greenprint Team
Mr. Kome Ajise, Executive Director
Southern California Association of Governments (SCAG)
900 Wilshire Blvd., Ste. 1700
Los Angeles, CA 90017

RE: October 7th Public Hearing SoCal Greenprint (Support)

Dear Mr. Ajise:

The Saddleback Canyons Conservancy (SCC) exists to support and strengthen the existing Foothill/Trabuco and Silverado-Modjeska Specific Plans as implementation policies of the Orange County General Plan. Within these Specific Plans are goals to preserve and protect the environmental treasures and rural character of the canyon communities adjacent to the Trabuco District of the Cleveland National Forest.

Because of this wide geography we are constantly in tune with road widening projects, tree infestations, wildlife movement, trail connections, wildfires, county/city General Plans, among many other topics. **That's why SCC supports the SoCal Greenprint: it synthesizes all the baseline information we would otherwise have to view individually and is all rolled into one resource.**

The thoughtful use of a wide variety of data layers will make this tool an easy "one-stop" shop for organizations, cities, counties, transportation agencies, and landowners to learn more about the overlap between the natural and built environment.

The Saddleback Canyons Conservancy urges the Regional Council to maintain the existing Greenprint and bring the project to completion as was outlined in the Regional Transportation Plan and Sustainable Communities strategy from 2020 (and 2016).

Sincerely,



Gloria Sefton
Co-Founder

Friends of Coyote Hills

A Park and Reserve for Now and the Future



P.O. Box 5267, Fullerton CA 92838 www.CoyoteHills.org

October 4, 2021

Submitted via email to: SCAGGreenRegion@scag.ca.gov

Board of Directors:

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Helen Higgins
Denise Holmes
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Matt Leslie
Kent Morris
Annik Ramsey
Jane Rands
Jeff Townsend

Supporting Organizations:

Friends of Harbors, Beaches & Parks
Audubon, Sea & Sage Chapter
Center for Biological Diversity
Cal. Native Plant Society
Southern California Botanists
Roots and Shoots Cal State Fullerton
Trust for Public Land
Hills for Everyone
Sierra Club, Orange County

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Claire Schlotterbeck
Kathleen Shanfield
Dr. Stewart Shanfield
Connie Spenger
Jane Reifer
Jean Watt, President FHBP

Attn: SoCal Greenprint Team
Southern California Association of Governments (SCAG)
900 Wilshire Blvd., Ste. 1700
Los Angeles, CA 90017
RE: SoCal Greenprint - SUPPORT

Dear SoCal Greenprint Team:

Friends of Coyote Hills fully supports the completion of the SoCal Greenprint. Our organization has been working diligently with the City of Fullerton and Pacific Coast Homes (a subsidiary of Chevron) to acquire for permanent preservation the last remaining wildlands, 510 acres, in Fullerton.

Our situation is unique in that the landowner, Pacific Coast Homes, already has the entitlements from the City that it needs to build 760 units on this hillside system. It was only in the last few years that the stars have aligned to make possible an acquisition of this size and importance for the region. It is our hope that the Regional Council understands that conservation can take many forms: land donation, fee title acquisition, mitigation, or even—like in our case—purchase after entitled.

We are aware that opponents are asking that all entitled or proposed housing projects be removed from the Greenprint. If that were to occur, it would appear that Coyote Hills was no longer available for protection. This would be inaccurate. In fact, as I write, the east half of the site is pending acquisition. The entire story must be told, it can't be cherry picked.

Please remember this Greenprint is a mitigation measure in your Environmental Impact Report/Statement and not completing it would simply mean you need to start again.

Sincerely,

Angela Lindstrom
President

October 4, 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.

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.

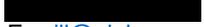
The Oct. 7 meeting is the third public meeting where the SCAG Regional Council has received input from more than 80 organizations who have expressed the need for a data-driven resources that supports the region's environmental and development goals. The public meetings are in addition to the outreach 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,

Will Wright, Hon. AIA LA
Director, Government & Public Affairs
American Institute of Architects, Los Angeles Chapter
Architecture for Communities Los Angeles
3780 Wilshire Blvd, Suite 701, Los Angeles (Yaangna), CA 90010

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LA CONSERVATION CORPS

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Mailing Address

P.O. Box 861658, Los Angeles, CA 90086-1658

October 5, 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

Dear SCAG President Lorimore,

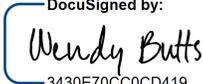
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Thank you,

DocuSigned by:

3430E70CC0CD419...
Wendy Butts
Chief Executive Officer



October 5, 2021

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

Re: SoCal Greenprint Initiative

I am writing on behalf of the Tataviam Land Conservancy (TLC) to issue this letter of support for the SoCal Greenprint and the Southern California Association of Governments (SCAG) initiative in developing a free, interactive, and easy-to-use resource accessible to many constituents like our organization.

The TLC is a California non-profit founded by the Fernandeano Tataviam Band of Mission Indians to protect Fernandeano Tataviam lands and promote public understanding of the cultural, biological, and historical resources located within the Tribe's traditional territory. The TLC holds land in perpetuity, preserving a property's unique cultural and environmental values. This land ownership offers increased protection to culturally and environmentally sensitive sites and prevents loss of cultural connection by providing a place where Fernandeano Tataviam people and neighboring tribes can gather, teach, and learn about their cultural heritage as well opportunities to increase understanding and provide open space access for the public.

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 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 can better understand how to make decisions about projects to 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 stakeholders who will be shaping the region's future.

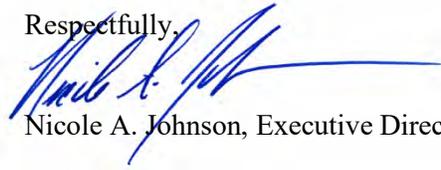
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on the data sources that will be used, and the list has been publicly available for weeks. Southern California has always been an environmental leader, and completing the SoCal Greenprint is a signal that the region continues to take its leadership role seriously.

As a tribal organization, TLC also supports the efforts to address inclusion, diversity, and equity in development of the SoCal Greenprint, values recognized by SCAG that create a robust resource for historically underrepresented and marginalized communities. As the region prepares for economic recovery following the pandemic, and cities across Southern California prepare to accommodate new housing and economic growth, further delays to the SoCal Greenprint mean that this useful resource will not be available to help make smarter decisions about incorporating nature into the future of the region.

It is time to move the SoCal Greenprint project toward completion and reinforce our regional commitment to building a sustainable Southern California.

Respectfully,



Nicole A. Johnson, Executive Director


Email nicole.johnson@tataviamlandconservancy.org



CALIFORNIA
NATIVE PLANT SOCIETY

Orange County Chapter
Supporting Nature with Native Plants

2021 October 6

Attn: SoCal Greenprint Team – India Brookover
Submitted via email to: SCAGGreenRegion@scag.ca.gov
Southern California Association of Governments (SCAG)
900 Wilshire Blvd., Ste. 1700; Los Angeles, CA 90017

RE: SoCal Greenprint - SUPPORT

Dear SoCal Greenprint Team:

We support completion of the SoCal Greenprint.

Our focus is California's natural local plants. It starts with habitat preservation and that leads to touchpoints with animals, air quality, water quality and availability, fire issues, greenspaces for humans, and human influenced climate change problems.

We know nature elements are part of a big system of interwoven human needs. Other needs including Housing that is affordable and in safe locations, Transportation networks to support our substantial human footprint in SoCal, Energy generation and distribution, Food production, and Jobs.

That is why **the Greenprint is needed now and needs to cover all land areas.** It is needed **for smart planning, zoning, and projects** that are in line with California mandates and that provide beneficial individual options. These activities should not destroy aspects of nature that will cause more environmental problems.

The Greenprint needs to be driven by a multi-municipality, big-issue solving, public good organization – that is the Southern California Association of Governments. A constructive process includes raising concerns over individual data layers. But, halting the Greenprint would be an unproductive loss for integrated solutions.

Thank you for supporting solutions for our future.

Brad C. Jenkins
President, **Orange County Chapter**
California Native Plant Society



October 5, 2021

Via Electronic Mail

scaggreenregion@scag.ca.gov

epubliccomment@scag.ca.gov

Southern California Association of Government
900 Wilshire Blvd., Ste. 1700
Los Angeles, CA 90017

**RE: Comments to SoCal Greenprint and Affirmation that SCAG Regional Council
Remove AVRCIS as a Data Source in GreenPrint**

Dear Members of the Board, Committee Members, and Staff:

This letter is sent in reference to Tejon Ranch Company's letter dated August 18, 2021 wherein the Company objected to the inclusion of the Antelope Valley Regional Conservation Investment Strategy (AVRCIS) as a dataset source in the proposed SoCal Greenprint.

The reasons for the required exclusion are more comprehensively described in the August 18th letter and prior communications attached to this correspondence. Since the letter's transmittal, we have received no response from your office. The only evidence substantiating SCAG's receipt of this letter is by means of our own review of the public registry of comments published on SCAG's website which includes a copy of our letter. SCAG's lack of communication thus far is discouraging and is indicative of regional development planning being spearheaded by many of the same self-interested and self-dealing environmental resource groups who have hijacked AVRCIS and are now serving on SCAG's technical committees and are doing the same to sabotage Greenprint; including, the Center for Biological Diversity, California Native Plant Society, and Endangered Habitats League to name a few. We implore Regional Council to undertake a concerted effort to better exercise control of the science to be incorporated into the Greenprint and start a meaningful effort to remove the self-interest and direct conflict of interest activities of radical environmentalist groups who have intentionally developed and weaponized through CEQA litigation, purported planning tools such as the Greenprint to usurp local government land use authority, regulate local land use, and to stop well considered and responsible development. In the case of the AVRCIS, their target is lands within Economic Opportunity Areas designated for future development under the approved and fully litigated Antelope Valley Area Plan which has been adopted into the Los Angeles County General Plan.

P.O. Box 1000 | 4436 Lebec Road
Tejon Ranch, CA 93243
661 248 3000 O | 661 248 3100 F
www.tejonranch.com

In addition to the conspicuous displays of self-interest, bias and direct conflict of the radical environmental resource groups that have hijacked the Greenprint process, by moving forward with Greenprint, SCAG staff is complacent in matters of systemic lack of transparency and disclosure, which arises to SCAG becoming an accomplice of misleading the public in its findings and results. Using the AVRCIS as an example, Dataset 119, which the Company in its prior comment letter vehemently objected to its inclusion, SCAG has proposed including the unapproved October 2019 draft AVRCIS as one of its many datasets despite the fact that it has not been approved by the California Department of Fish and Wildlife and does not include the best available scientific information. It utilizes dated, desktop-level science rather than more current and accurate sources of environmental data, namely the court certified environmental documentation for the Centennial Specific Plan, State Route 138 right of way and the Antelope Valley Area Plan. Many of the same environmental organizations who developed this self-serving and deeply flawed RCIS serve on the technical committees which both vets and elects which datasets are to be used in Greenprint. SCAG staff, willingly or otherwise in advocating for employing certain shoddy science to be made a part of Greenprint, without full disclosure to the public regarding the self-serving sources and misleading content of such information comprising the AVRCIS is as culpable as the environmental resource groups that have created this fraud on the public. SCAG staff's unfettered willingness to utilize an unapproved and illegitimate data source such as the AVRCIS in creation of the SoCal Greenprint does a gross disservice to advancing the purported purpose for which this development tool is being championed by SCAG.

Unless and until the above substantive and procedural short comings and indiscretions occurring as part of the Greenprint process are properly addressed, as illustrated by the inclusion of AVRCIS in particular, but other similarly situated problematic datasets at large, we ask that the Regional Council direct SCAG staff to stop the current Greenprint process, and re-start it only after its purpose, scope, and stakeholder engagement process have been clearly prescribed by the Regional Council.

Very Truly Yours,



Marc W. Hardy
Senior Vice President, General Counsel



October 5th 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

Strategic Actions for a Just Economy (SAJE), a nonprofit focusing on economic justice, tenant rights, equitable development and healthy housing, writes this letter to voice our support for The SoCal Greenprint tool. 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 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.

Thank you,

Maria Patiño Gutierrez
Maria Patiño Gutierrez

Assistant Director of Policy and Research
Strategic Actions for a Just Economy (SAJE)

mpatino@saje.net

525 S. Hewitt St.
Los Angeles, CA 90013
(213) 689-9707 usgbc-la.org

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Marcela Oliva - LA Trade Tech

Seth Stronnin - ARI IP

October 6, 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

Dear SCAG President Lorimore,

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. We at the US Green Building Council-Los Angeles (USGBC-LA) work closely with developers, contractors, property managers, cities, utilities, consultants, green building advocates, and more, toward creating a sustainable built environment for all. Our work encompasses issues heavily influenced by climate change –wildfires, affordable housing, electrification, transportation, air quality, water, equity and more. With people spending over 90% of their time indoors, the built environment (and moving between buildings) is key to addressing climate change.

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.

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Seth Stronin - ARIIP

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Thank you,



Ben Stapleton
Executive Director, USGBC-LA

October 6, 2021

Honorable SCAG Regional Council,

Thank you to SCAG for the opportunity to provide feedback and voice support for the continuation of the SoCal Greenprint project. My name is Brittany Rivas, Community Organizer with the Los Angeles Alliance for a New Economy.

At LAANE, we believe that data is the foundation of smart decision making that makes the stakes, opportunities and benefits clear. Access to information is especially important as we embark on the important effort to shape the future of a six-county region. We need to make decisions about where housing growth will occur, where we will place parks and green space so that people have the resources they need for healthy living, and amid a drought, how we will protect valuable resources like clean water. The SoCal Greenprint will be an invaluable asset in getting a baseline understanding of the issues that need to be considered as the region grows and develops amid what we know will be increasingly concerning climate change challenges.

For our campaigns, we use data to understand how to maximize the public good and ensure that underserved communities get a fair chance to succeed and thrive. That is why we are especially eager to see the completion of the equity section that puts an important lens on how our most impacted residents are experiencing environmental injustices and threats from climate change.

We encourage SCAG to finalize the SoCal Greenprint and make this important resource available to the stakeholders who will be shaping the intertwined future of our region.

--

Best,

Brittany D. Rivas

Community Organizer, Water Project

E Brivas@laane.org

O (213) 977- 9400 ext. 105

M [REDACTED]

P She/Her/Hers



464 Lucas Ave. Suite 202
Los Angeles, CA 90017

www.laane.org





October 6, 2021

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

Re: SoCal Greenprint Initiative

Dear SCAG President Lorimore,

We are writing in support of the SoCal Greenprint, which is a crucial resource for planning a healthier and more sustainable Southern California. The SoCal Greenprint will help Southern California accommodate more housing, achieve sustainable economic growth and address longstanding transportation needs.

The October 7th hearing is the third public meeting where the SCAG Regional Council will receive input on the SoCal Greenprint. More than eighty organizations have previously expressed the need for data-driven resources that support the region's environmental and development goals. The public meetings are in addition to the yearlong outreach process, which received feedback from more than sixty organizations across the six SCAG counties. These organizations come from diverse backgrounds such as academia, business, environmental advocates, developers and government agencies.

The SoCal Greenprint does not create new policies or rules. Rather, it provides the information and resources needed to make smarter and more equitable decisions, improving the sustainability of our environment and economic systems while planning for growth. This is especially important for environmental issues that do not have jurisdictional boundaries, such as air pollution. It is worth noting again that disadvantaged communities suffer disproportionately from pollution in large part due to poor land use decisions and historical discrimination. As local governments and developers design the future of our communities, data can help us begin the hard but necessary work of correcting these wrongs.

Southern California has no time to waste in proactively building for a better future. Heat waves, wildfires and chronic poor air quality have made it clear the climate crisis is a challenge that requires data, action, and visionary leadership. We urge you to move the SoCal Greenprint forward and make this invaluable resource available for all who are responsible for building a vibrant, healthier future for our region.

Thank you,

A handwritten signature in black ink, appearing to read "Christopher Chavez". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Chris Chavez
Deputy Policy Director



October 6, 2021

India Brookover
Southern California Association of Governments (SCAG)
900 Wilshire Blvd., Ste. 1700
Los Angeles, CA 90017

Re: Support for Adoption of SoCal Greenprint

Dear Ms. Brookover:

On behalf of the Council of Infill Builders, a statewide organization of real estate professionals committed to improving California through infill development, I write to express our support for the Southern California Association of Governments (SCAG) voting to approve and adopt the SoCal Greenprint at its October 7th meeting.

As you know, SCAG developed the SoCal Greenprint in partnership with The Nature Conservancy as an innovative and user-friendly mapping tool to provide data on agricultural lands, access to parks and trails, habitat protection, clean water and air, and food production. Insights from the SoCal Greenprint data can inform local governments, housing advocates, and community groups on the optimal places to focus new home building and associated infill development while improving resilience to climate impacts.

SCAG's approval of the Greenprint will help make that data available to planners, policymakers, and pro-infill housing interests. By compiling and collating more than one hundred existing data sources into interactive maps, the Greenprint can help organizations like ours better advocate for infill development that integrates climate resilience into future growth. The Greenprint allows stakeholders to layer information on agriculture and working lands, the built environment, vulnerabilities and resilience, environmental justice, equity, habitat, and water resources, among others. By containing this information in a centralized data hub, SCAG's approval will make it easier to avoid building new housing in high-fire risk areas and instead enable communities to live more sustainably through infill.

The Council of Infill Builders thanks you for your attention and respectfully requests adoption of the SoCal Greenprint into SCAG's planning framework.

Sincerely,

A handwritten signature in black ink that reads "Meea Kang". The signature is fluid and cursive, with a long, sweeping underline that extends to the right.

Meea Kang
Council of Infill Builders



Mayor

Brad Avery

Mayor Pro Tem

Kevin Muldoon

Council Members

Noah Blom

Joy Brenner

Diane Brooks Dixon

Marshall "Duffy" Duffield

Will O'Neill

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: Clarifications to Scope and Implementation of SoCal Greenprint

Dear President Lorimore and Regional Council Members:

The City of Newport Beach wishes to voice concern over the unclear regulatory implications of SoCal Greenprint that can result in unintended legal challenges for local agencies. There are numerous, unresolved issues with SoCal Greenprint that building industry and community leaders have raised in recent months, including its questionable integration with adopted plans and CEQA, and the veracity of the datasets. To expand on this dialogue, the City submits the following comments:

"Best Available Science" Optional? SoCal Greenprint's basic premise as an "*optional*, flexible, and open regional conservation-focused data and mapping tool" is commendable and can prove helpful in facilitating conversation efforts [emphasis added]. However, there is a big difference between an easily accessible resource used voluntarily by interested stakeholders (as described) and a "best practices tool" local agencies must consult to inform policy making. There are claims by SCAG staff that seem to suggest Greenprint is a database authority aggregating the "best available science." In the connection of science and policy, the term "best available science" is difficult to define, and yet it has severe ramifications for development. While some Greenprint datasets are well-established and indisputably an industry standard, others in the 166 potential datasets do not have such standing and may even conflict with data designated in General Plans and policies. Some Greenprint datasets are notoriously outdated or fail to account for

important factors. Other datasets rely on citizen science, which traditionally pose barriers to making reliable scientific inferences about ecology. Examples of these challenges include: species bias, spatial bias, and effort variance. How would Greenprint datasets interact with already established “best available science” as determined by local agencies on the same subject matter? This is especially alarming with CEQA review: What would happen if there a conflict between the best available science determined by a local agency and Greenprint?

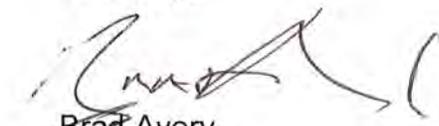
Optional Advanced Mitigation? There is further lack of direction on the calls for local agencies to employ Greenprint for advanced mitigation purposes. The staff report briefly describes, “Identifying mitigation opportunities early in the planning stages can reduce costs for projects and can also reduce uncertainty in the CEQA process.” The suggestion is that Greenprint is a new best practice that local jurisdictions perform as a necessary step. But say an environmental issue arises later that was not identified by Greenprint, who is liable for lost time and damages incurred by the project applicant?

Consistency Clash with GreenPrint and CEQA. The Sohagi Law Group’s memorandum concludes that Greenprint is an informational resource, and, because of this, it would “not disrupt the traditional CEQA process in any way.” However, the development and planned application of Greenprint appears to go beyond mere information. As explained above, Greenprint has been advanced as a container of “best available science” and something that should be utilized for undefined advanced mitigation. In this respect, the memorandum should be revised to clarify Greenprint’s categorization of its datasets as the “best available science” and its implications for existing environmental review practices. The memorandum should also elaborate on the legal aspects and requirements for local jurisdictions to do advanced mitigation.

The City fully encourages and supports a Greenprint as a valuable informational tool that does not conflict with CEQA, local agency policy, and procedures. Unless SCAG clarifies the scope and intention of the current Greenprint, there is deep concern that the program would intervene with local land use decisions and open local jurisdictions to legal challenge.

Taking notice of these issues in this letter is greatly appreciated. We look forward to working with you in future to ensure the successful implementation of SoCal Greenprint.

Sincerely,



Brad Avery
Mayor

Newport Beach

cc. Marnie Primmer, Orange County Council of Governments Executive Director
Adam Wood, Building Industry Association of Southern California

SHUTE MIHALY
& WEINBERGER LLP

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GABRIEL M.B. ROSS
Attorney
Ross@smwlaw.com

October 6, 2021

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

Re: SoCal Greenprint

Dear Mr. Ajise:

On behalf of Hills For Everyone I am writing to urge completion of the SoCal Greenprint. Hills For Everyone is a member of the Natural Lands Coalition and a community-based organization, formed to protect, preserve, and restore the environmental resources and natural environs of the Puente-Chino Hills Wildlife Corridor for the enjoyment of current and succeeding generations.

The Building Industry Association (“BIA”), seems to think that housing and conservation are conflicting priorities and the Greenprint must be permanently eliminated. SCAG must reject BIA’s request. The validity of Connect SoCal, your Regional Transportation Plan/Sustainable Communities Strategy (“the RTP/SCS”) depends on the timely completion of the Greenprint; allowing the Greenprint to wither from neglect will put at risk the projects that depend on the RTP/SCS.

This proposed “pause,” moreover, would violate SCAG’s obligations under the California Environmental Quality Act (“CEQA”). The Programmatic Environmental Impact Report for the RTP/SCS, found that the plan’s transportation and land use program would have six impacts on habitat and species. To help reduce these impacts, it identified SCAG Mitigation Measure BIO-2, directing SCAG to complete the Greenprint. In adopting the RTP/SCS and the accompanying CEQA findings, SCAG made a legal commitment to fulfill the mitigation. BIA’s proposal that parties step away from the Greenprint, if implemented, would violate SCAG’s obligations under CEQA.

Mitigation measures “are not mere expressions of hope.” *Lincoln Place Tenants Assn. v. City of Los Angeles* (2005) 130 Cal.App.4th 1491, 1508. CEQA requires them to “actually be implemented . . . and not merely adopted and then neglected or disregarded. *Id.* The law is

thus clear that SCAG may not abandon the Greenprint: “Once incorporated, mitigation measures cannot be defeated by ignoring them or by attempting to render them meaningless by moving ahead with the project in spite of them.” *Sierra Club v. County of San Diego* (2014) 231 Cal. App. 4th 1152, 1167 (quotation marks omitted).

Following BIA’s lead and relabeling an abandonment as an indefinite “pause” would not alter the situation. Even if SCAG formally continues the Greenprint process, endless delays would constitute effective abandonment. “Mitigation measures cannot be defeated by ignoring them” *Sierra Club*, 231 Cal.App.4th at 1167 ; *see also Katzeff v. California Dept. of Forestry and Fire Protection* (2010) 181 Cal.App.4th 601, 611 (mitigation measures are not “nullified by the passage of time”).

BIA is thus effectively asking SCAG to end the mitigation measure that centers on the Greenprint. But SCAG may not “delet[e] an earlier adopted mitigation measure,” without “a legitimate reason” supported by substantial evidence. *Lincoln Place Tenants Assn. v. City of Los Angeles* (2005) 130 Cal. App. 4th 1491, 1509. BIA has not offered SCAG any legitimate reason, let alone any supporting evidence, for its proposed “pause.” Unless and until SCAG establishes that reason and evidence in a supplemental EIR, the RTP/SCS “as modified by the deletion or deletions, [would be] invalid and cannot be enforced.” *Id.* In order to continue the use of the RTP/SCS for its intended purposes, SCAG must not abandon the Greenprint, either officially or by putting it on hold as BIA proposes.

BIA’s substantive concerns are also a dead end for the Greenprint. BIA asks to remove all lands “planned or approved for development” from the Greenprint’s database. In other words, BIA would like the Greenprint to identify for protection only lands already protected. This entirely misses the point of the Greenprint particularly because such database and map already exist through the California Protected Areas Database. Per the binding mitigation measure, the purpose of the effort is “to help local jurisdictions identify areas well suited for infill and redevelopment as well as critical habitat and natural lands to be preserved, including natural habitat corridors.” It would leave the Greenprint a redundant exercise. BIA’s preference is not what Southern California needs or what the RTP/SCS requires.

In its letters of May 12 and August 13, 2021, however, BIA has asked you to put the Greenprint on hold. Rather than move forward with this informational tool, BIA would like to take an indefinite time for more process. This pause is entirely unnecessary. As the Natural Lands Coalition pointed out in its letter of August 23, 2021, development of the Greenprint has been marked by serious engagement by officials, non-profits, and the public. Several of the data layers that BIA contests are *already in use* in other SCAG mapping tools like HELPR and within the Sustainability Program Resource Maps on the SCAG website

Kome Ajise
October 6, 2021
Page 3

(<https://scag.ca.gov/sustainability-program-resources-maps>). Now is the time to complete the project, not delay it.

Hills For Everyone has seen first-hand the importance of reliable publicly available baseline data, as unsustainable development proposals in Very High Fire Hazard Severity Zones threaten the integrity of the protected parklands, and also risk life and property. We are often called to help provide developers with mitigation ideas in and around the Puente-Chino Hills. The Greenprint could benefit development by aiding in the understanding of mitigation opportunities.

SCAG therefore must reject BIA's proposed "pause" and its attempt to alter the Greenprint's layers and must instead proceed with the plan. Hills For Everyone and the rest of the Natural Lands Coalition look forward to working with you, as we have for the last several RTP/SCS cycles, to complete this important effort.

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP



Gabriel M.B. Ross

1424174.4



August 23, 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

Dear SCAG President Lorimore,

As a climate justice and sustainability organization, the [Robert Redford Conservancy for Southern California Sustainability](#) (RRC) would like to thank the Southern California Association of Governments for its visionary move to sponsor the development of the SoCal Greenprint project. We strongly urge the organization to keep the project on track for a Fall 2021 launch.

We support the SoCal Greenprint and applaud the Southern California Association of Governments for developing a free, interactive, and easy-to-use resource for constituents like ourselves. The SoCal Greenprint is an important project that will help Southern California continue to be a leader and develop a vision for the future of the region that is committed to both economic vibrancy and environmental stewardship. We strongly urge SCAG to keep the project on track for a Fall 2021 launch.

Access to data and information is essential in making smart decisions about the future of our communities. Access to a resource like this is indispensable for our students who are researching and innovating on sustainable and balanced approaches to solve complex problems. As potential users of the SoCal Greenprint, we applaud SCAG's leadership for taking more than 100 sources of already publicly-available data and converting them into a useful tool that helps stakeholders visualize how to build healthier communities. As extreme weather, air quality, wildfires and drought become increasingly daily challenges, we expect our local leaders to seek the best tools to ensure that Southern California is prepared and resilient for the challenges that we know lie ahead. The SoCal Greenprint can be one of those crucial tools to help us prepare for these challenges.

We especially find value in the addition of an equity section that will allow us to understand how to best plan for growth that addresses the environmental injustices certain communities have disproportionately faced for far too long, such as challenges that threaten health and safety. A vibrant future for these communities is coupled with our ability to prepare for the effects of climate change. The SoCal Greenprint can help us do so in a way that makes it possible for every Southern Californian to thrive.

We want to reiterate our support for the completion of the SoCal Greenprint. We encourage SCAG to continue its leadership in demonstrating that growth and sustainability are not incompatible, but essential for a vibrant future.

Sincerely,

Susan A. Phillips, Ph.D.
Professor of Environmental Analysis
Interim Director, Robert Redford Conservancy
susan_phillips@pitzer.edu



October 6, 2021

Submitted via email to: SCAGGreenRegion@scag.ca.gov

Attn: SoCal Greenprint Team
 Southern California Association of Governments (SCAG)
 900 Wilshire Blvd., Ste. 1700
 Los Angeles, CA 90017

RE: Comments on the SoCal Greenprint

Dear SCAG Greenprint Team and Regional Council members:

We are writing to support the SoCal Greenprint. The unique attribute of the 2020 Regional Transportation Plan (RTP) and Sustainable Communities Strategy (SCS) (together, Connect SoCal) is its inclusive vision to find the “and” between housing, transportation, and conservation. Support for and interest in the SoCal Greenprint continues to expand to this day.

We believed at that time Connect SoCal was drafted and approved, just as we do now, that including conservation of natural and farmlands was a step in the right direction. Because of the very public process around the adoption of the RTP/SCS at that time, we were not aware that SCAG’s goals would be challenged a year later in such a way that SCAG would even consider rescinding on its promise to develop the SoCal Greenprint.

Our concerns are as follows:

PUBLIC PROCESS HAS BEEN TRANSPARENT & INCLUSIVE

For the last five years, SCAG staff has shepherded a Natural and Farmlands Working Group in quarterly meetings—all of which are appropriately noticed and open to the public. Numerous presentations on the SoCal Greenprint and Conservation Module were given in the Working Group meetings. The Greenprint has been discussed at workshops and the Natural Lands Working Group a minimum of nine times (3/9/17, 9/28/17, 4/19/18, 7/19/18, 12/11/19, 5/28/20, 10/15/20, 2/25/21, and 5/27/21).

Further, the Greenprint was regularly highlighted multiple times at the Energy and Environment Committee; the Community, Economic, and Human Development Committee; and Regional Council meetings. All of these are public meetings. This is why it comes as such a shock to see such fierce opposition stemming from one constituent-base toward the Greenprint now. What happened? We've been engaged in this process for five years—the Greenprint has been an ongoing, sustained project of SCAG's for years. It was also highlighted in the SCAG Work Plans as well.

MULTIPLE DOCUMENT REVIEWS/APPROVALS OCCURRED

Not only did the SCAG Regional Council approve the RTP/SCS and all other mitigation measures in the Program Environmental Impact Report/Statement (PEIR/S) at its May 2020 meeting, but it *reaffirmed* that approval at its September 2020 meeting after a tightening up and refinement of the mitigation measures. This means there were two reviews of the documents and its mitigation measures before it was approved by majority vote of the Regional Council.

THE GREENPRINT IS A MITIGATION MEASURE

The Greenprint is also a twice-listed mitigation measure in the PEIR/S. Specifically, SCAG Mitigation Measure Agricultural Resources AG-2 (SMM AG-2) expressly requires development of a Greenprint, and SCAG Mitigation Measure Biological Resources BIO-2 (SMM BIO-2) also expressly requires the development of new regional tools, like the Greenprint. This cannot be ignored, or undone without re-opening the environmental review process with legitimate cause.

THE GREENPRINT IS WELL SUPPORTED

Part of the reason this Coalition supported the Natural and Farmlands Appendix and associated environmental documents for Connect SoCal is because it included the Greenprint and other ways to meet the regional greenhouse gas emission and vehicle miles traveled reduction goals *set by the State*. Conservation is one tool to reduce both. We cannot build our way to a better climate. We can conserve our way to it. We are facing immediate and dire consequences from the climate crisis—right now. Any lands protected would be through a willing seller acquisition—land is not taken through eminent domain for conservation purposes.

GREENPRINT LAYERS

No new information was created for this Greenprint. Consequently, this tool is simply synthesizing what already exists. Further, these layers are already publicly available. This type of tool can, for example, benefit the development community in that they can find mitigation locations and understand baseline site conditions or future impacts related to climate change. Planning in a vacuum is never a good idea. The inclusivity of this information makes the tool valuable to many types of stakeholders.

Thank you for the opportunity to comment and provide our collective and individual support. We hope that SCAG leaders, and even the BIA, recognize the value of collaboration, tools that cross multiple sectors, and that an all-or-nothing approach does more harm than good.

Should you have any questions, please reach out to this coalition coordinator, Melanie Schlotterbeck of Friends of Harbors, Beaches and Parks at 714-779-7561.

Sincerely,

Amigos de Bolsa Chica · Amigos de los Rios · Ballona Wetlands Land Trust · Banning Ranch Conservancy · Bolsa Chica Land Trust · California Chaparral Institute · California Cultural Resource Preservation Alliance · California Native Plant Society - Orange County Chapter · California Wildlife Foundation/California Oaks · Center for Biological Diversity · Coachella Valley Waterkeeper · Defenders of Wildlife · Diamond Bar-Pomona Valley Task Force of the Sierra Club · Endangered Habitats League · Fallbrook Land Conservancy · Friends of Coyote Hills · Friends of Harbors, Beaches and Parks · Hills For Everyone · Hobo Aliso Task Force of the Sierra Club · Huntington Beach Tree Society, Inc. · Inland Empire Waterkeeper · Laguna Canyon Conservancy · Laguna Ocean Foundation · League of Women Voters of Orange Coast · Los Angeles, Santa Monica Chapters of the California Native Plant Society · Los Cerritos Wetlands Land Trust · Natural Resources Defense Council · Naturalist For You - Santa Ana Mountains Wild Heritage Project · Orange Coast River Park · Orange County Interfaith Coalition for the Environment · Orange County League of Conservation Voters · Orange County Coastkeeper · Pomona Valley Audubon Society · Puente-Chino Hills Task Force of the Sierra Club · Residents for Responsible Desalination · Responsible Land Use (Diamond Bar) · Rio Hondo Group of the Sierra Club · Rural Canyons Conservation Fund · Saddleback Canyons Conservancy · Sea and Sage Audubon Society · Stop Polluting Our Newport · Surfrider - Newport Beach Chapter · Surfrider - South Orange County Chapter · Surfrider LA · The Trust for Public Land · Tri-County Conservation League · Ventura Land Trust · Wild Heritage Planners · Women 4 Orange County

Celina Oliveri- Associate Biologist Caltrans- I support the SoCal Greenprint: The SoCal Greenprint has a wide range of benefits for the inhabitants and visitors within our specific region. Fundamentally, the SoCal Greenprint can create more opportunities for protection of open space and working lands by linking them to a community's economic and social values. Conservation investments can help a community improve water quality, provide healthy recreational opportunities, preserve the agricultural economy, and protect the heritage and character of a region. The tool is not creating/enacting any new laws, and is not seeking to hinder any development; it is merely providing important information for infrastructure agencies, such as the DOT, which can be used in informing where mitigation should occur. It is an important tool that will allow for early planning decisions in regard to climate change as well.

Francis Appiah
Mitigation Specialist
Department of Transportation
Division of Environmental Planning
100 S. Main Street, Los Angeles, CA 90012
Mobile: [REDACTED]



October 6, 2021

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

Dear Chairperson Lorimore and Councilmembers,

Thank you for your continued efforts to develop the SoCal Greenprint. This essential resource will help all stakeholders plan for a healthier and more sustainable Southern California, as we work together to improve housing, transportation, and economic opportunity. We applaud your leadership and appreciate the staff commitment made to prepare this interactive tool for launch, and are excited for the chance to begin utilizing it.

Prevention Institute is a nonprofit organization with offices in Los Angeles and three other cities. Our mission is to build prevention and health equity into key policies and actions at all levels of government, to ensure that the places where people live, work, play and learn foster health, safety, and wellbeing. Since 1997, we have partnered with communities, local government entities, foundations, and public health agencies to bring cutting-edge research, practice, strategy, and analysis to the pressing health and safety concerns of the day. Our work focuses on addressing the social determinants of health, which includes improving the quality of the built and natural environment to advance health equity.

While we know that the SoCal Greenprint does not create new policy or regulations, the value of having easy access to a regional perspective on environmental conditions can help us address issues that do not follow boundaries and jurisdictions such as air quality, conservation of important habitat space and preparing for the impacts of climate change. By compiling various existing data sources into a single mapping platform, stakeholders who are shaping the region's future will be empowered to make smarter planning decisions.

Tomorrow's meeting follows two previous public meetings where the SCAG Regional Council has received input from more than 80 organizations, expressing the need for a data-driven resource that supports the region's environmental and development goals. Additionally, a yearlong outreach process to help form project committees included feedback from more than 60 organizations that represent the six SCAG counties and diverse sectors such as academia, conservation, development, and government, all who have provided important feedback on making the SoCal Greenprint a useful resource. Furthermore, SCAG collected survey feedback on the data sources to be included, 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 the region prepare to accommodate new housing and economic growth, further delays in launching this resource will impede smart decision-making about how to incorporate nature into the future of the region. It is time to complete this project and reinforce our regional commitment to building a sustainable Southern California. Thank you for your time and consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "Elva Yañez". The signature is fluid and cursive, with a long horizontal stroke at the end.

Elva Yañez
Director of Health Equity



October 6, 2021

Attn: SoCal Greenprint Team
Southern California Association of Governments (SCAG)
900 Wilshire Blvd., Ste. 1700
Los Angeles, CA 90017

Submitted via email to: SCAGGreenRegion@scaag.ca.gov

RE: SoCal Greenprint Public Hearing (10/7/2021)

Dear President Lorimore:

The Laguna Ocean Foundation is writing to offer its full support for the SoCal Greenprint. Since 2003, our mission has been to optimize the health of Laguna's vital coastal ecosystems through science, education, and community involvement. To do this, the health of the coast is essential.

Laguna Beach is a premier coastal destination. Our community depends on dollars brought in from tourists spending at restaurants, hotels, and shops. Those same tourists come to enjoy the beaches, tidepools, and 20,000 acres of wildlands and trails nearby. The Orange County Visitors Association reported in 2018 that the County brought in \$13 **billion** from 50 million visitors. The environment is the attraction.

In order to maintain this tourist destination and continue to bring in revenue that supports our community, organizations like ours help educate the public about the importance of the land and sea connection. The Greenprint provides the connections in a digital format that helps organizations like ours educate the public through a science-based tool.

The SoCal Greenprint crosses multiple jurisdictions and boundaries between land and sea. This is of critical import to our organization. For example, impaired water bodies impact the health of the ocean. If too much bacteria exists, the beaches are shut down and the economy suffers. Other examples of Greenprint data layers our organization is focused on include: coastal habitat vulnerability, the coastal zone, stream courses, and runoff.

California's coastal resources are so important that the state created 124 Marine Protected Areas—three are in Laguna Beach. From tidepoolers to beach goers, scuba divers to surfers—visitors and residents expect and deserve clean and healthy waters.

In conclusion, the Foundation urges SCAG to finish the Greenprint as promised.

Sincerely,

A handwritten signature in blue ink, appearing to read "Virginia Esperanza Lorne".

Virginia Esperanza Lorne
Managing Director

Robert Wang, Senior Environmental Planner/GIS/Drone Specialist, Caltrans: Greenprinting is a GIS-based service that will help communities prioritize their parks and conservation goals. Using spatial analysis (GIS) and aerial photo interpretation (photogrammetry) in a transparent mapping and modeling process, a Greenprint delivers both a long-term vision for conservation and a concrete plan to protect the places most important to a community.

Thank you,

Francis Appiah
Mitigation Specialist
Department of Transportation
Division of Environmental Planning
100 S. Main Street, Los Angeles, CA 90012
Mobile: [REDACTED]

October 6, 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

Dear SCAG President Lorimore,

As a 5013c desert conservation organization which has to date conserved over 100,000 acres of fragile and unique desert lands within the California Desert Conservation Area, we are reaching out to thank the Southern California Association of Governments for development of the SoCal Greenprint project.

As potential users of the SoCal Greenprint, we applaud SCAG's leadership for taking more than 100 sources of already publicly-available data and converting them into a useful tool that helps stakeholders visualize how to conserve and protect our invaluable desert ecosystems and landscapes. As development pressures, wildfires and climate change become increasingly greater threats, we expect our local leaders to seek the best tools to ensure that Southern California is prepared and resilient for the challenges that we know lie ahead. The SoCal Greenprint can be one of those crucial tools to help us prepare for these challenges. Specifically, we would request map layers to include boundaries for the California Desert Conservation Area; wildlife corridors and habitat; and desert landscapes that have been identified as having high biological diversity and importance for conservation.

As a region, Southern California is connected by National Parks and wilderness areas, wildlife corridors, conservation areas and economic activity. The SoCal Greenprint will help to promote smart regional planning that also makes sense to promote environmental conservation.

We urge you to take the feedback collected to strengthen the tool and develop the resources we need for sustainable growth in Southern California.

Thank you,

Susy Boyd
Public Policy Coordinator
Mojave Desert Land Trust

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COMMITTEES
CHAIR: TRANSPORTATION
ARTS, ENTERTAINMENT, SPORTS,
TOURISM, AND INTERNET MEDIA
NATURAL RESOURCES
WATER, PARKS AND WILDLIFE

October 6, 2021

Chair Clint Lorimore and the Regional Council
Southern California Association of Governments
ATTN: Maggie Aguilar <aguilarm@scag.ca.gov>
900 Wilshire Blvd., Ste. 1700
Los Angeles, CA 90017

RE: Support for the SoCal Greenprint (Hearing date, October 6, 2021)

Dear Chair Lorimore and Councilmembers,

I would like to express enthusiastic support for the SoCal Greenprint project and convey how essential the interactive, web-based mapping resource will be to help shape the future of the Southern California region. The SoCal Greenprint will help local governments, infrastructure agencies, the private sector, land use planners, community based organizations and other stakeholders incorporate nature into communities, increase access to nature and protect and enhance the extraordinary natural resources and working lands that are essential to healthy, vibrant and resilient communities.

In a region where watersheds, wildlife corridors, air quality and economic activity overlap among various jurisdictions, the ability to comprehensively visualize these issues at a regional scale is essential to success. As Southern California grows and develops, the vibrancy and health of its communities requires an understanding of how to incorporate nature into our growing region, including ensuring that vulnerable communities and communities of color have equitable access to nature. Data is a critical tool in planning for communities that will have the environmental resources needed to ensure resilience in the face of climate threats, sustainability, economic vitality and public health; including park space, clean air and water, and habitat for the diverse plants and wildlife that call Southern California home.

Moreover, the SoCal Greenprint will help integrate nature early into the planning process for transportation, water and energy infrastructure and housing projects, reducing the risk for delays and costly expenses from potential mitigation needs, permitting challenges or community opposition. Integrating conservation information into infrastructure and other development processes through tools like greenprints is a common practice that has been successful throughout the SCAG region, in California and nationwide.

The SoCal Greenprint will help the 191 cities and six counties in the SCAG region prepare for a future where housing, increased transportation options and good jobs will be needed. The SoCal Greenprint will help SCAG and its member jurisdictions create a roadmap for the future that proactively balances economic, environmental and public health goals.

I commend SCAG for its leadership and urge you to continue supporting the SoCal Greenprint to its launch this fall. Thank you for building an essential resource that once again demonstrates the region's economic and environmental leadership.

Sincerely,

A handwritten signature in black ink, appearing to read "Laura Friedman". The signature is fluid and cursive, with the first name "Laura" written in a larger, more prominent script than the last name "Friedman".

Assemblymember Laura Friedman,
43rd Assembly District

Hello,

My name Francis Appiah, Senior Environmental Planner/Mitigation Specialist Caltrans and I support the SoCal Greenprint: A Greenprint helps a community make informed decisions about how to grow while preserving character, identifies opportunities for recreation, clean water, environmental health, and quality of life. Both guides began with community engagement and have resulted in protection of many of the identified important places in SoCal to be preserved. The Greenprint Guide is an inventory of publicly-identified natural, agricultural, and historic resources worthy of protection. In SoCal, I believe the Greenprint will identify important resources like springs, productive agricultural lands, scenic roads, important gateways, greenspace buffers, etc. Because citizens drove the Greenprinting process, the inventory represents public opinion about what is important to save for future generations.

Thank you,

Francis Appiah
Mitigation Specialist
Department of Transportation
Division of Environmental Planning
100 S. Main Street, Los Angeles, CA 90012
Mobile: [REDACTED]

Hello,

I am Newton Wong, Associate Biologist, Caltrans. I support the Greenprint because the Greenprint will promote ecological health and cultural landscape preservation for Southern California. It is a plan to preserve and protect SoCal land for the betterment of its ecology, economy and quality of life. Also the Greenprint does not create any new laws for the developers to be afraid of. These GIS-based plans help communities build partnerships, develop policies, and secure funding for conservation.

Thank you,

Francis Appiah
Mitigation Specialist
Department of Transportation
Division of Environmental Planning
100 S. Main Street, Los Angeles, CA 90012
Mobile: [REDACTED]

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

Re: SoCal Greenprint Initiative
August 17, 2021

Dear SCAG President Lorimore,

Southern California is a region that needs additional housing and public transportation services. The SoCal Greenprint is an additional tool that enables understanding the region's resources and their importance to human well-being and thus an important planning guide. Southern California will likely add population growth, the SoCal Greenprint provides the resources necessary to ensure this development happens in a way that is more socially, environmentally, and economically sustainable. The tool helps to assist the Southern California Association of Governments and California to guide the development of healthy cities and places for all.

The SoCal Greenprint can help provide the analysis such that proposed projects are built to mitigate some of the environmental challenges we know lie ahead and protect the region's many resources. To date, development has occurred largely with little forethought of impacts. The development, for example, on the region's alluvial fans, has exposed people to fire and flood, as well as having reduced ground water infiltration. Extensive development in the wildland/urban interface has unnecessarily exposed people to danger and fire fighting has cost all of us an enormous amount of money and stress. There is plenty of land remaining in the urbanized areas for further housing, ensuring the region can meet its AB 32 goals and enable people to commute effectively and less expensively. Intelligent development policy is a matter of political will and foresight by our elected officials. To continue to permit sprawl as usual is increasingly socially, environmentally, and economically. The Greenprint can point out such impacts of proposed developments such that policy makers can make more thoughtful decisions.

At a time when environmental conditions related to drought, wildfire, earthquakes, and pollution in Southern California are apparent, I urge SCAG to continue to move the Greenprint project along, it is benign enough, a map. In the end, its simply another tool that the region can use to build better into the future.

Sincerely,

Stephanie Pincetl,

Professor, UCLA Institute of the Environment and Sustainability.

Author: *Transforming California, a Political History of Land Use in the State; Energy Use in Cities, a Roadmap for Urban Transformation* and over 100 additional articles on land use development, habitat conservation planning, water and energy management.



Southern California Association of Governments (SCAG) Regional Council
 900 Wilshire Blvd., Ste. 1700
 Los Angeles, CA 90017

August 23, 2021

RE: The SoCal Greenprint Tool - Support

Dear SCAG Regional Councilmembers,

The SoCal Greenprint will compile more than one hundred existing data sources into interactive maps that help stakeholders visualize how to better integrate nature into future growth and development. The Greenprint will be an immense help for local jurisdictions, transportation agencies, developers, non-profits and other stakeholders in advancing the policies adopted in Connect SoCal.

This project is not only crucial in implementing various SCAG policies, but will also be of monumental benefit to organizations across the region as we work on a broad range of projects, issues, and goals. The layers with information on agriculture and working lands, built environment, vulnerabilities and resilience, environmental justice, equity and inclusion, habitat and biodiversity, and water resources will be elucidating for many organizations that don't have access to this information. Providing a centralized hub for this data will help greatly to expedite important work in the interest of the public good.

As such, we, the below signed organizations, would like to express our strong support of the SoCal Greenprint tool's implementation.

Sincerely,

Bryn Lindblad
Deputy Director
Climate Resolve

Dan Silver
Executive Director
Endangered Habitats League

Louis Mirante
Legislative Director
CA YIMBY

Leonora Camner
Executive Director
Abundant Housing

Carter Rubin
Mobility and Climate Advocate
NRDC

Tommy Newman
Vice President
Engagement and Activation
Everyone In

Elizabeth Reid-Waistcoat
Urban Wildlands Campaigner
Center for Biological Diversity

Tara Barauskas and Andy Hattala
Chapter Co-Chairs
The Climate Reality Project, Los
Angeles Chapter

Ismar Enriquez, AIA, LFA, LEED AP
AIA, Los Angeles Chapter
Chair
Committee On The Environment

Fatima Malik
President
League of Women Voters of Los
Angeles County

Zachary Schlagel
Senior Director of Public Policy
PATH (People Assisting The
Homeless)



Officers:

Terry Welsh, M.D.
President

Suzanne Forster
Vice-President

Deborah Koken
Secretary

Carol Lind
Treasurer

Melanie Schlotterbeck
Executive Director

Board Members:

Diane Silvers, Ed.D.

Rick Huffman

Paul Waggoner

Jan Vandersloot, M.D.
In Memoriam

Mailing Address:

P.O. Box 15333
Newport Beach, CA
92659-5333

Phone:

(714) 719-2148

E-Mail Address:

info@BanningRanch
Conservancy.org

October 6, 2021

Submitted via email to: SCAGGreenRegion@scag.ca.gov

Attn: SoCal Greenprint Team
Southern California Association of Governments (SCAG)
900 Wilshire Blvd., Ste. 1700
Los Angeles, CA 90017

RE: SoCal Greenprint - SUPPORT

Dear SoCal Greenprint Team:

The Banning Ranch Conservancy wishes to express its **support** for the SoCal Greenprint under consideration at the SCAG Regional Council on Thursday, October 7, 2021.

Ours isn't the typical story as it relates to land conservation. Currently, the landowner is a willing seller (Newport Banning Ranch), the property is under contract for conservation, and we are less than a year away from acquiring this important 384-acre coastal resource. As of last week, we have \$83M of the \$97M appraised value secured through public and private grants.

Digital tools like the SoCal Greenprint offer an opportunity to view the landscape through a different lens and provide a wealth of scientific facts about the area that are typically only available through individual websites. For example, the Banning Ranch property is in close proximity to disadvantaged, socially vulnerable, and park poor communities. Further, the property contains over 3,000 years of documented evidence of Native Nation habitation and sits within the coastal zone along the Santa Ana River. All of these important on-the-ground details exist today and are the types of datasets included in the SoCal Greenprint. None of this should be controversial, they are simply the baseline facts for this (and other) properties throughout Southern California.

To this end, we support the SoCal Greenprint, urge the Regional Council to meet the goals of the Natural and Farmlands Appendix as well as Connect SoCal. We encourage your vote to complete this web-based tool.

Sincerely,

Terry M. Welsh, M.D.
President



October 6, 2021

Submitted via email to: SCAGGreenRegion@scag.ca.gov

Attn: SoCal Greenprint Team
Southern California Association of Governments (SCAG)
900 Wilshire Blvd., Ste. 1700
Los Angeles, CA 90017

RE: SoCal Greenprint Public Hearing (10/7/2021)

Dear SCAG Greenprint Team:

This letter serves as written comments for the October 7, 2021 Public Hearing on the SCAG Greenprint.

Friends of Harbors, Beaches and Parks (FHBP) has been engaged with SCAG for many years. Since 2012, we have organized a conservation coalition to support the natural and farmland policies and regional advance mitigation programs (RAMPs) included in the Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS). Every year the RTP/SCSs were considered, the coalition expanded. It now approaches 50 organizations across the six-county region.

We remain deeply concerned about the recent attempts to end the completion and release of the SCAG Greenprint for the following reasons:

1. **The Greenprint is a tool, not a plan.** Comments during the August 24th public hearing seemed to miss that the Greenprint is an online tool. When groups say they support the Greenprint, they are supporting the comprehensive database that synthesizes information for users. There is no associated plan that goes with it. Look no further than the SCAG HELPR tool. It is another example of what a digital tool can look like—layers turning on and off, the user controlling what information is displayed, etc.
2. **SCAG already uses many layers being contested.** Many of the layers in the HELPR tool will also be in the Greenprint, so this information already exists in a SCAG produced publicly available spatial format. These layers have also been used in the Sustainability Program Resource Maps on the SCAG website (<https://scag.ca.gov/sustainability-program-resources-maps>). So, why are the data layers unfit for use in the Greenprint, but okay for use in other SCAG tools and maps without objection?
3. **The Greenprint is a mitigation measure.** The Greenprint is included in the Program Environmental Impact Report and Environmental Impact Statement. This is a legally

binding commitment made by SCAG to reduce the impacts of the RTP/SCS. Mitigation measures can't be undone without legitimate reasons—of which none exist.

4. **The Greenprint has included significant public participation.** The Greenprint has been envisioned since the 2016 RTP/SCS and has broad support. The Building Industry Association (BIA) had ample opportunity to raise their concerns during other public hearings to adopt the RTP/SCS plans. The Regional Council heard it in 2016 and twice in 2020 when this document was being considered. There were also opportunities to raise concerns at the various Committee meetings—those opportunities were ignored. Further, the Greenprint was also covered in *nine* meetings held by the Natural and Farmlands Working Group.
5. **Conservation and housing can co-exist.** Conservation of natural lands (parks/open space) is a designated land use and zone in state law. Housing and infrastructure are also designated land uses and zones. These are not conflicting positions; they are all included on the map and belong there *together*.
6. **HELPR is a digital mapping tool created by SCAG and released unimpeded.** The existing SCAG HELPR tool looks for potential infill or refill sites for the 6th cycle of the Regional Housing Needs Assessment. The conservation community didn't attempt to stop housing production by ending this tool when it was released. We recognize housing and natural land preservation can and does co-exist.
7. **Two state mandates exist: housing and conservation.** While there is a state mandate for housing, there is also an Executive Order (N-82-20) that sets the target of protecting 30% of California's lands and coastal waters by 2030. These housing and conservation mandates exist *simultaneously*.
8. **Natural lands help create sustainable communities.** We cannot build our way to a better climate, smarter cities, and more transit friendly neighborhoods. Natural lands and farmland preservation *can* help achieve a more sustainable future. Habitat and soil both sequester carbon and protect the land from future conversion to urban uses that increase greenhouse gas emissions and vehicle miles traveled.
9. **SCAG's purview is regional in nature and should include everything, not exclude certain parts.** All of Southern California's landscapes (developed/undeveloped and preserved/unpreserved) must be included in the map. The context of preserved lands, development, transportation corridors, and possible opportunities for infill or conservation is critically important for the comprehensive view. Ensuring the entirety of the region is included *is the regional context necessary for cross jurisdictional evaluation*. Without it, SCAG is simply back to siloed planning with cities and counties.
10. **No new data is being created for the Greenprint's use.** Information included in the Greenprint is already publicly available and if a development project were to proceed, those data layers and a complete written analysis would be included in the Environmental Impact Report for the proposed project. To act as if those basic facts don't exist *until a*

project is proposed is nonsense.

11. **The Greenprint meets the Connect SoCal goals.** Natural land preservation is supported by no less than four Connect SoCal goals. These include:

5. Reduce greenhouse gas emissions and improve air quality
6. Support healthy and equitable communities
7. Adapt to a changing climate and support an integrated regional development pattern and transportation network
10. Promote conservation of natural and agricultural lands and restoration of habitats

For these reasons and more, **we still support the SoCal Greenprint.**

To conclude, we urge SCAG to continue the commitments made and finish the Greenprint this fall.

Thank you,



Michael Wellborn
President



COUNTY of VENTURA

Board of Supervisors

SUPERVISOR KELLY LONG
Third District

MEMBERS OF THE BOARD

Matt LaVere
Linda Parks
Kelly Long
Bob Huber
Carmen Ramirez

September 29, 2021

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

Dear President Lorimore and Regional Council Members,

I am writing to express my individual concerns with the Greenprint open data platform and the intended uses which could overstep local governments and the unique issues associated with each.

As currently presented, the ramifications of this program are unknown as it relates to a variety of issues such as: communities expanding job opportunities, improving local infrastructure and addressing the very real issues related to housing shortages.

Greenprint appears to be a one size fits all approach meant to group all local governments together. This is problematic because it does not reflect the very diverse and unique issues that each community faces. Specifically, local General Plans need to be considered as to not create local policy conflicts which creates chasms that cannot be addressed.

For instance, Ventura County already has several land-use measures in place which prevent urban sprawl. They include polices like "Guidelines for Orderly Development" and voter approved initiatives such as Save Open Space Agriculture Resources (SOAR) which requires a majority vote of the people before agricultural land or open space areas can be rezoned for development. Together, they represent some of the strictest zoning restrictions in place across the country. As such, the Greenprint does not reflect our local issues and needs. This inadvertent dismissal of Ventura County's specific issues is concerning and demonstrates the flaws and vulnerabilities of Greenprint.

My request, which is shared by many, is to slow this process down to ensure that it does not overstep local policies currently in place. Furthermore, as many local jurisdictions are in the process of updating their General Plans, the timing of Greenprint is problematic and the likelihood of potential conflicts is high. My office is open and ready for further discussions to work together to create something less intrusive that works for all local governments.

Sincerely,

Kelly Long
Ventura County Supervisor, District 3



BUILDING INDUSTRY LEGAL DEFENSE FOUNDATION

October 7, 2021

Hon. Clint Lorimore
Southern California Association of Governments
900 Wilshire Blvd., Ste. 1700
Los Angeles, CA 9001

RE: SoCal Greenprint October 7th Public Hearing

Dear President Lorimore:

As recently as late last week, SCAG staff released additional documents endorsing the SoCal Greenprint but even with this additional disclosure, there has been no information shared explaining how each of the Greenprint's proposed 166 "datasets" are supposed to be used. The 166 "datasets" are themselves an odd collection of more than 40 academic journals, anti-development activist group invented "indexes," and other anti-development criteria. The menagerie of "data" includes a mysterious assortment of other content ranging from things like Congressional district boundaries and county renewable energy project siting ordinances, to century-old maps, outdated and inaccurate lists and maps, and only recently-repaired links to websites that are expressly self-identified as containing inaccurate or "expired" data.

As we have previously communicated to you, these "Greenprint datasets" were selected by a "Science Advisory Committee" whose members were disclosed a scant two months ago, and included two anti-development activists and various academics – but no scientists qualified to attest to the labor, public health, environmental justice, environmental, climate, or economic benefits of implementing the infrastructure, housing, and economic development plans and projects already approved by the elected leaders of our region's six counties and 191 cities. Greenprint also had what SCAG staff identified as a "stakeholder" committee, but we know from experience that scheduled stakeholder meetings were tightly-constrained, where questions remained unanswered and objections were not addressed. With these facts in mind, we have several key points that must be brought to the attention of the Regional Council.

1. SCAG's Rush to Judgment: The September 2020 Connect SoCal Plan (Where Greenprint is Identified Only in an Appendix) Says Development of Greenprint is a "Multi-Year" Process – But SCAG Seeks Approval In 2021.

"Greenprint" is a top-down decision that establishes scores of new criteria intend to be applied to both development and land conservation decisions. As passionately stated by one of the environmental activists who spoke in favor of this Greenprint, elected officials and project applicants can "change their mind" and reverse course on an approved plan or project. Another

activist ominously threatened that SCAG would create a massive schism with environmentalists if Greenprint was not adopted as proposed in October 2021. It is no coincidence that this coincides with the time that local agencies are adopting, and implementing, local Housing Elements to comply with Regional Housing Needs Assessment allocations – and it is no coincidence that Greenprint creates over 40 new tools to challenge adoption or implementation of these plans in CEQA lawsuits.

We believe that Greenprint is intended to frustrate, through CEQA lawsuits, implementation of plans and projects adopted by local-elected leaders. These lawsuits will delay or destroy housing production in furtherance of two goals:

- Adopting Greenprint to empower anti-housing lawsuits against local government will reduce production of housing. In these lawsuits, local government will be blamed under the RHNA process for failing to meet its RHNA goals, and delayed housing production will further strengthen the Legislature’s desire to preempt and end local land use control – and be politically “solved” with more top-down land use authority.
- The perceptually conflicted organization whom SCAG hired to run Greenprint, (which selected biased and conflicted groups of scientists and stakeholders), is creating a system that will limit naturally occurring affordable housing. Local governments planning infill housing on surplus lands such as school sites or defunct golf courses interfere with activists seeking to convert these lands into parks, and planning balanced edge-development on undeveloped parcels interfere with activists seeking to enforce current urban edges as urban limit lines.

SCAG staff has steadfastly declined to disclose any purported urgency for adopting Greenprint in October 2021. There is no deadline established in Connect SoCal 2020, which in fact describes Greenprint as a “multi-year” process. What is clear, however, from a comment letter filed by anti-housing activists (who routinely sue to block approved plans and projects in the region), is their urgent demand that Greenprint be immediately approved (as these organizations have themselves designed this “tool”), just in time to challenge Housing Elements, and housing projects – required by the Regional Housing Needs Assessment process. It is clear to us that these activist organizations have every intention of continuing their decades-long practice of filing lawsuits against housing, infrastructure, and economic development plans and projects – and favor only high-density housing in transit-dependent neighborhoods.

2. SCAG Staff’s Embrace of Top-Down Planning, and Rejection of “Local Control” and “Local Input”

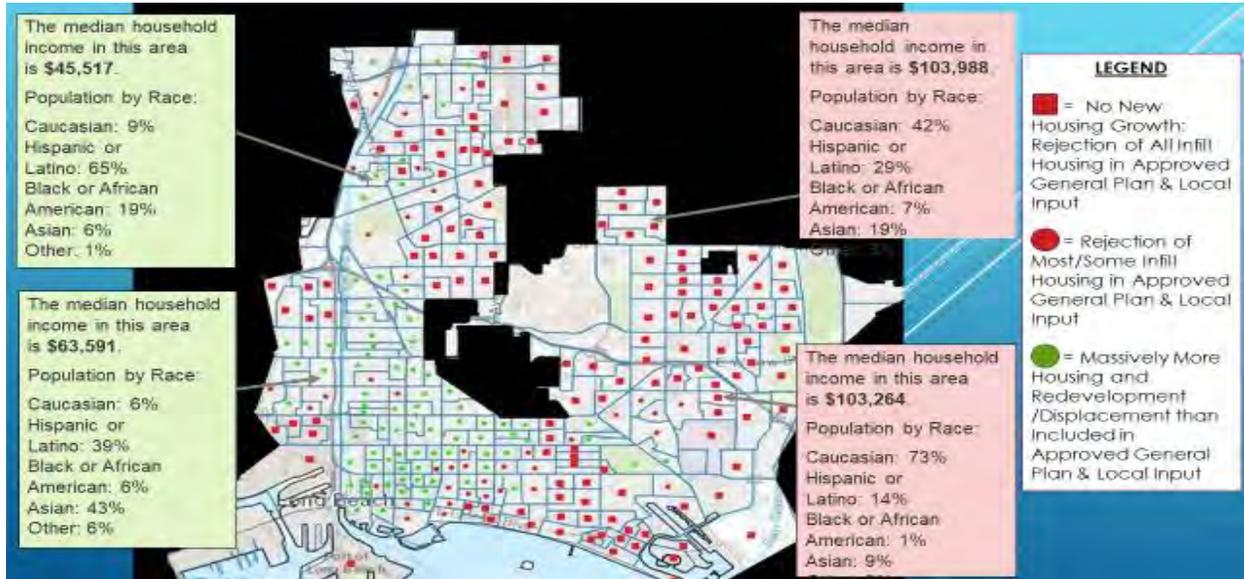
In 2020, (contrary to dozens of assurances that Connect SoCal respected “local input” and deferred to “local control,”) SCAG developed Traffic Analysis Zone maps identifying where new housing should – and should not – be allowed to achieve “vehicle mile traveled” mandates dictated by the California Air Resources Board (CARB). This TAZ dispute was ultimately resolved by Regional Council leadership’s decision to reverse SCAG staff’s decision, and after a mandated “pause,” the Regional Council joined our diverse coalition and prohibited future use of these TAZ maps. Absent this Regional Council rejection, these TAZ maps would have established the mandatory “pattern of development” that local governments must follow in future housing elements under

RHNA law. Tables 1 and 2, below, shows the massive rejection of “local input” that would undermine locally-approved plans and projects:

| Figure 1 SCAG Staff Rejection Rate of Housing Local Input by County in Traffic Analysis Zone Maps for Connect SoCal 2020 | |
|---|--------------|
| Riverside | 71.6% |
| San Bernardino | 53.5% |
| Imperial | 65.6% |
| Ventura | 40.5% |
| Orange | 36.3% |
| Los Angeles | 33.9% |

| Figure 2 SCAG Staff Rejection Rates for Local Housing Input Within Each City Varies Dramatically | |
|---|--------------------------|
| Long Beach Los Angeles | 91% 10% |
| Pasadena Torrance | 90+% 0% |
| South Gate Glendale | 90+% 0% |
| Culver City Downey | 90+% 0% |
| Compton Covina | 90+% 0% |
| Beverly Hills Burbank | 90+% 0% |

The SCAG TAZ map housing plan would have created the most problematic housing approach in more than a century – forbidding new housing in wealthy neighborhoods with few racial minorities, and cramming almost all new housing in the poorest, most densely populated, majority-minority neighborhoods. This shocking outcome, outlawed under California civil rights and housing laws, is shown on Figure 3 for Long Beach:



SCAG staff's TAZ map housing plan for growing cities, where homeownership remains accessible to working families (and Latinos and other communities of color that comprise the majority of homeowners), is equally troubling. In Ontario, SCAG staff's TAZ maps called for a halt to housing already in production, for which roads and infrastructure had already been financed and partly installed, in the long-planned southern portion of Ontario – while limiting new housing to employer locations along the I-10 corridor and cramming the remainder of new housing into the city's majority-minority, low-income neighborhood:



Based on these shocking maps, the Regional Council resolution expressly identified the conflicts between state housing and climate laws – and pledged to work to resolve the conflict. We are aware of no work to implement this express direction by the Regional Council. Instead, we have spent much of 2021 attempting to require disclosure of what the Greenprint actually is (partly completed, with many broken website links, in September 2021), who created it (membership of science and stakeholder groups), how each of the 166 data sets is to be used and why inaccurate, activist-invented, and unvetted datasets are included at all. Further, there has been no disclosure as to why this “multi-year” Greenprint development process has been prioritized over more urgent Connect SoCal tasks like maximizing infrastructure funding for the transportation projects included in the Regional Transportation Plan.

3. Response to New Greenprint Support Letters

This section briefly responds to two of SCAG staff’s solicited Greenprint support letters:

1. Caltrans: As our coalition has repeatedly made clear, we support completion of a Greenprint that helps Caltrans and other infrastructure agencies identify priority voluntary biological and agricultural resource mitigation lands for planned and approved infrastructure improvement projects, including those proposed by Caltrans.

Under the Brown Administration, Caltrans staff expanded their agency’s mission into housing and other local land use decisions. Caltrans is not in a position to engage in top-down local housing, economic development, and infrastructure planning or project approvals, and has no statutory authority to either override or undermine local control. Various Sacramento authorities, (including Caltrans and CARB), are enthusiastic about expanding their role into a top-down land use authority similar to the Coastal Commission. Former CARB Chair Mary Nichols, for example, proposed that CARB serve in the equivalent of a Coastal Commission role for non-coastal lands statewide. We do not support top-down planning by state agencies, and note that there are dozens of federal, state and local regulations that already parse jurisdictional control over transportation infrastructure projects.

We are aligned with Caltrans to the extent that Greenprint is limited to agricultural and open space, and not aligned to the extent that Caltrans is seeking to expand its own role – or expand SCAG’s role – or expand the role of anti-housing activists – through Greenprint.

2. Sohagi Opinion: SCAG also hired an outside counsel whose firm exclusively represents public agencies to opine that Greenprint is not “significant new information” under CEQA. While respecting that differing lawyers have differing opinions, we offer three points in rebuttal.

First, for private projects, employers and developers must pay CEQA litigation defense costs – and suffer the economic costs of litigation delays – and an attorney who represents only public agencies does not have the same client, or litigation cost and delay exposure, as private applicants. Had the Center for Biological Diversity, one of the region’s most prolific anti-housing CEQA litigants (which also holds a rare seat on

Greenprint's exclusive Science Advisory Board responsible for selecting the 166 datasets), agreed that under no conceivable scenario could they ever make a CEQA litigation claim based on Greenprint (inclusive of any and all of the activist/academic datasets included in Greenprint), this legal opinion would have been more relevant. In fact, however, the opposite is true: CBD has already used one of the datasets in its unsuccessful challenge to a Los Angeles County project, and both Los Angeles County and the applicant in that case were both forced to defend CBD's use of the dataset even before it was embraced and elevated into Greenprint by SCAG staff.

Second, as former Governor Jerry Brown repeatedly pronounced, CEQA is a "blob" that continues to grow and change shape based on unpredictable and sometimes inconsistent judicial decisions. No lawyer can be certain of a judicial outcome. Just one of many clear examples of the uncontrollable nature of the "blob" is the evolution of CEQA's greenhouse gas (and vehicle miles travelled) mitigation requirements based on a 2010 guidance document prepared by consultants working for California's Air Pollution Control Officers' Association (CAPCOA Manual). The CAPCOA Manual acknowledges uncertainties in the content and analysis, acknowledges that CAPCOA has no legal jurisdiction on GHG/VMT mitigation under CEQA or otherwise, and expressly prohibits use of the CAPCOA Manual in any legal proceeding, including for example rulemaking and CEQA litigation. Notwithstanding these uncertainties, qualifications, and express prohibitions as to future use, the CAPCOA Manual has emerged as "the" authoritative source of "substantial evidence" regarding GHG/VMT mitigation. The CAPCOA Manual was expressly and repeatedly used to establish VMT reduction mandates and methodologies in the state rulemaking process resulting in changes to the CEQA Guidelines, is routinely used in all CEQA documents addressing GHG/VMT mitigation and is in fact the subject of numerous CEQA lawsuits. Governor Jerry Brown couldn't control "the blob" – and neither can an opinion offered by counsel retained by SCAG.

Third, SCAG itself has no "skin in the game" if prolific anti-housing organizations use Greenprint to litigate against local government infrastructure, housing and economic development projects. If SCAG is wrong – as ALL of the CAPCOA Manual authors were wrong in 2010 when they thought they could prohibit CEQA use of their Manual – then it is the targets of CEQA lawsuits (and those needing the homes, infrastructure and jobs that are targeted by CEQA lawsuits) who will pay the lawyers and suffer the costs and harms of delays. **If SCAG is truly confident that Greenprint could NEVER be used in any CEQA context against a project, then SCAG should indemnify local governments and applicants for legal costs and delay damages caused by any such lawsuit.** If SCAG is right, this indemnity will cost SCAG nothing. If SCAG is wrong – and we believe it is – then SCAG should absorb the cost of its error.

Conclusion:

The SoCal Greenprint will reject and undermine plans and projects approved by the region's elected officials. Therefore, we respectfully repeat our urgent request that Greenprint be stopped and re-started with a Regional Council-approved purpose, scope, and process that is designed to support and facilitate the timely funding and implement the infrastructure, housing and economic development decisions of elected city and county leaders included in the approved

Regional Transportation Plan, approved General Plans (including Housing Elements), and approved and pending projects.

Thank you for your thoughtful consideration of the important points raised above.

Sincerely,

A handwritten signature in black ink, appearing to be 'AW', with a long horizontal stroke extending to the right.

Adam Wood
Administrator
Building Industry Legal Defense Foundation
17192 Murphy Avenue, #14445
Irvine, CA 92623