

October 6, 2021

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

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

Dear President Lorimore and Regional Council Members:

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

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

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

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

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

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

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

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

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

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

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

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

Sincerely,



Richard Lambros, Managing Director  
Southern California Leadership Council



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



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



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



Maria Salinas, President & CEO  
Los Angeles Area Chamber of Commerce



**LOS ANGELES AREA**  
CHAMBER OF COMMERCE

Jon Switalski, Executive Director  
Rebuild SoCal Partnership



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



*Dexter McLeod*

Dexter McLeod, Chief Executive Officer  
L.A. South Chamber of Commerce



South Chamber  
of Commerce

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



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



**SANTA CLARITA VALLEY**  
Chamber of Commerce

Mario Rodriguez, Chairman  
Hispanic 100



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



Donna Duperron, President & CEO  
Torrance Area Chamber of Commerce



Barbara Thomas, Executive Director  
South Orange County Economic Coalition



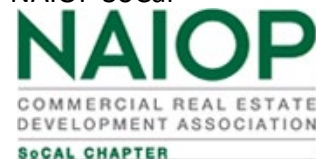
Louise Lampara, Executive Director  
Ventura County Coalition of Labor, Agriculture  
and Business (CoLAB)



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



Timothy Jemal, Chief Executive Officer  
NAIOP SoCal



Carolyn Cavecche, President & CEO  
Orange County Taxpayers Association

