



LOS ANGELES AREA
CHAMBER OF COMMERCE



SANTA CLARITA VALLEY
Chamber of Commerce



April 30, 2021

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

Re: SoCal Greenprint Initiative

Dear President Richardson and Regional Council Members:

On behalf of the business, industry and community organizations subscribing to this letter, we write today as a Business Coalition to express our concern regarding the development of the SoCal Greenprint. We understand that it is to serve as a strategic web-based conservation tool to assist landowners, developers, cities, counties and infrastructure agencies make land use and transportation decisions. With this understanding, as representatives of many of the aforementioned interests, we seek clarification on issues that have recently been brought to our attention.

First, we seek legal justification for the use of SB 1 Funds on the creation of a web-based conservation tool. Many of our organizations supported SB 1 as a means to rebuild California by fixing neighborhood streets, freeways and bridges along with funding being targeted towards

congested trade and commute corridor improvements. Tangible infrastructure improvements are essential for our business community and our labor workforce. A diversion of funds from such uses gives us pause and we appreciate your assistance in expanding upon SCAG's use of such funding for an internet tool.

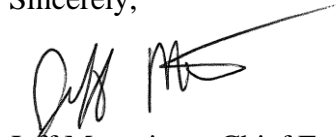
Next, we are concerned with the means by which the SoCal Greenprint is being developed. Many of our organizations are familiar with the work of The Nature Conservancy (TNC) and their strong dedication to conserving open space. It would appear, on its face, that placing TNC in charge of the development of a conservation land use tool would create a significant conflict of interest. This is not a criticism of TNC, rather, a puzzling decision by SCAG. Similar to placing an asphalt manufacturer in charge of roadway planning or a homebuilder in charge of RHNA, selecting TNC to manage the development of a conservation tool places it under a cloud of suspicion. These concerns are enhanced by early presentations on the SoCal Greenprint that have listed land as "constrained," which can have troubling consequences.

Although the SoCal Greenprint is positioned as a tool to deliver information in an easily accessible and publicly available way, unintended consequences can arise under California State law. We are deeply troubled by information that centralizing disparate data points into the SoCal Greenprint under "development constraint" headings can create renewed CEQA liabilities. It should come as no surprise that CEQA is an area of deep concern for our joint industries as all too often this environmental tool is egregiously misused as a means to simply inhibit development, rather than protect the environment. If the potential that the nomenclature used in the SoCal Greenprint can trigger new or expanded CEQA vulnerabilities, we request your immediate attention on this matter.

Finally, our respective organizations would appreciate a better understanding of the input received in the crafting of the SoCal Greenprint. Again, the Greenprint has been presented as a tool to benefit landowners, developers, cities, counties and infrastructure agencies. It would be logical that a broad cross section of landowners, developers, cities, counties and infrastructure agencies are being consulted and have been providing input during the development process. Our understanding is that TNC was selected for their unique ability to leverage resources to engage important stakeholders like these. Our concern is that this has not been the case.

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 and that we have a viable tool that can truly support our business, development and labor partners in their efforts to strengthen the Southern California region for all of its inhabitants.

Sincerely,



Jeff Montejano, Chief Executive Officer
Building Industry Association of Southern
California (BIASC)



Richard Lambros, Managing Director
Southern California Leadership Council



**SOUTHERN CALIFORNIA
LEADERSHIP COUNCIL**

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



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



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



John Hakel, Executive Director
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Maria Salinas, President & CEO
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John Vance, Chair of the Board
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