



August 23, 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:

Thank you for the opportunity to comment on the SCAG SoCal Greenprint. In 2020, a coalition of nearly 50 organizations that spanned the six-countywide region supported the 2020 Regional Transportation Plan (RTP) and Sustainable Communities Strategy (SCS) called Connect SoCal because of its inclusive vision to find the “and” between housing, transportation, and conservation. We are writing to support this vision *once again*—even as others can only see value in their interests.

By way of background, this coalition has grown in size, geography, and interest since it first formed in 2012. In the 2012 RTP/SCS, the coalition focused on the inclusion of natural lands mitigation and associated policies within the SCAG plans. Later, in January 2020, we were pleased to see SCAG advancing the preservation of natural and farmlands by including it as one of the 10 goals for the plan. This was the *first time in your organization’s then 55-year history* that conservation was a plan goal.

We believed at that time, 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. If this occurred, SCAG would be in breach of its promises made in environmental documents since it is a twice listed mitigation measure. **Consequently, we support completing the Greenprint and launching it this in Fall 2021—as promised.**

To be quite direct, SCAG and the conservation community had not had a robustly positive relationship until Friends of Harbors, Beaches and Parks began following and participating in the RTP/SCS process in 2012. Through its leadership, our organizations were brought along and actively engaged in the process. It would be a terrible shame if, after three RTP/SCS cycles, SCAG ignores the voices of regional conservation partners because one very loud voice, the Building Industry Association (BIA) and its members, delayed its engagement on this topic and is suddenly not happy.

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. 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. Two reviews of the documents and its mitigation measures occurred and were approved by majority vote of the Regional Council.

Members from the conservation community commented *at every single meeting* where the Natural and Farmlands Appendix was or could be discussed during this review. Why didn't the BIA raise concerns then? This is the third Natural and Farmlands Appendix created in an RTP/SCS by SCAG, so it shouldn't come as any surprise that it was again included in the 2020 documents. The Greenprint was a natural progression from the 2016 commitments.

GREENPRINT INCLUDED IN NATURAL AND FARM LANDS APPENDIX

Contrary to the letter submitted by the BIA on May 12, 2021, the Greenprint is, in fact, listed in the Natural and Farmlands Appendix as something SCAG is developing (page 22). It is described as:

“SCAG is developing a Regional Greenprint, which is a strategic web-based conservation tool that provides the best available scientific data and scenario visualizations to help cities, counties and transportation agencies make better land use and transportation infrastructure decisions and conserve natural and farm lands. Specifically, the Regional Greenprint will serve as an online mapping platform illuminating the multiple benefits of natural and agricultural lands through data related to key topics such as habitat

connectivity, biodiversity, clean water, agriculture, and greenhouse gas sequestration.”

This tool was included in the Appendix. The Appendix is part of Connect SoCal. Therefore, the tool is part of the RTP/SCS.

Further, language incorporated in the 2016 Plan states:

“[SCAG will] Continue to gather spatial and other data to better inform regional policies regarding natural/farm lands, such as the 2014 data gathering efforts to provide coarse and fine scale habitat assessment data for the SCAG region.” (Data Sharing header, page 6)

And,

“Expanding on the Natural Resource Inventory Database and Conservation Framework & Assessment by incorporating strategic mapping layers to build the database and further refine the priority conservation areas.” (Strategies and Next Step Recommendations, page 7)

THE GREENPRINT IS A MITIGATION MEASURE

SCAG is fully aware that not only is the Greenprint a goal within the Natural and Farmlands Appendix, but it 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.

Eliminating a mitigation measure in an approved document will simply mean that SCAG will be required to start the mitigation measure over again from scratch, and the last 18 months will have been a complete waste of time and taxpayer dollars to fund the work a second time, especially when the existing Greenprint is nearly completed.

TRANSPORTATION CONFORMITY AT RISK

Further, the Connect SoCal document received its transportation conformity determination on June 5, 2020 from the Federal Highway Administration and the Federal Transit Administration. Stopping the Greenprint, and functionally eliminating a mitigation measure, would unnecessarily risk approvals and the determination.

THE GREENPRINT IS WELL SUPPORTED

As noted in our letter from January 2020, which was conveniently not referenced in the BIA letter, the Coalition believes this Greenprint “is a great next step to the 2016 Plan and we support this policy as is.” Part of the reason this Coalition supported the Natural and Farmlands Appendix and associated environmental documents for Connect SoCal is because it included this 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 never taken through eminent domain for conservation purposes.

Further, did we not just learn the value of open space close to neighborhoods during the pandemic? Natural lands and access to them was a saving grace for many families and individuals that had no other safe space to visit.

As indicated in the PowerPoint from July 2021 to the Regional Council, the Greenprint integrates nature into the built environment.

GREENPRINT SURVEY COMPLETED

While many of us completed the online survey to support the Greenprint layers, we'd like to acknowledge the thoughtful nature, inclusion, and separation by topic of the data layers into relevant categories. All of the layers have our full support. Each and every master category sheds light onto an important topic that is relevant to both the natural *and* built environment. We hope the BIA paid particular attention to this commenting opportunity so that SCAG can appropriately respond to its concerns.

Further, these layers are already publicly available. No new information was created for this Greenprint. Consequently, the Greenprint is simply synthesizing what already exists. This type of tool can, for example, benefit the development community in that they can find mitigation locations and understand site constraints 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 substantive input. 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 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 · 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