



SOUTHERN CALIFORNIA  
ASSOCIATION OF GOVERNMENTS  
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## REMOTE PARTICIPATION ONLY

# REGIONAL ADVANCED MITIGATION PLANNING ADVISORY TASK GROUP

**Friday, January 28, 2022**  
**3:00 p.m. – 5:00 p.m.**

**To Attend and Participate on Your Computer:**

**<https://scag.zoom.us/j/92156366986>**

**To Attend and Participate by Phone:**

**Call-in Number: 1-669-900-6833**

**Meeting ID: 921 5636 6986**

***Please see next page for detailed  
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### **PUBLIC ADVISORY**

Given the declared state of emergency (pursuant to State of Emergency Proclamation dated March 4, 2020) and local public health directives imposing and recommending social distancing measures due to the threat of COVID-19, and pursuant to Government Code Section 54953(e)(1)(A), the meeting will be held telephonically and electronically.

If members of the public wish to review the attachments or have any questions on any of the agenda items, please contact Maggie Aguilar at (213) 630-1420 or via email at [aguilarm@scag.ca.gov](mailto:aguilarm@scag.ca.gov). Agendas & Minutes are also available at: [www.scag.ca.gov/committees](http://www.scag.ca.gov/committees).

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1. **In Writing:** Submit written comments via email to: [scaggreenregion@scag.ca.gov](mailto:scaggreenregion@scag.ca.gov) by **5pm on Thursday, January 27, 2022**. You are **not** required to submit public comments in writing or in advance of the meeting; this option is offered as a convenience should you desire not to provide comments in real time as described below.

All written comments received after 5pm on Thursday, January 27, 2022 will be announced and included as part of the official record of the meeting.

2. **In Real Time:** If participating in real time via Zoom or phone, during the Public Comment Period (Matters Not on the Agenda) or at the time the item on the agenda for which you wish to speak is called, use the “raise hand” function on your computer or \*9 by phone and wait for SCAG staff to announce your name/phone number. SCAG staff will unmute your line when it is your turn to speak. Limit oral comments to 3 minutes, or as otherwise directed by the presiding officer. For purpose of providing public comment for items listed on the Consent Calendar, please indicate that you wish to speak when the Consent Calendar is called; items listed on the Consent Calendar will be acted on with one motion and there will be no separate discussion of these items unless a member of the legislative body so requests, in which event, the item will be considered separately.

If unable to connect by Zoom or phone and you wish to make a comment, you may submit written comments via email to: [scaggreenregion@scag.ca.gov](mailto:scaggreenregion@scag.ca.gov).

***In accordance with SCAG’s Regional Council Policy, Article VI, Section H and California Government Code Section 54957.9, if a SCAG meeting is “willfully interrupted” and the “orderly conduct of the meeting” becomes unfeasible, the presiding officer or the Chair of the legislative body may order the removal of the individuals who are disrupting the meeting.***

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### OUR MISSION

To foster innovative regional solutions that improve the lives of Southern Californians through inclusive collaboration, visionary planning, regional advocacy, information sharing, and promoting best practices.

### OUR VISION

Southern California’s Catalyst for a Brighter Future

### OUR CORE VALUES

Be Open | Lead by Example | Make an Impact | Be Courageous



## Instructions for Participating in the Meeting

SCAG is providing multiple options to view or participate in the meeting:

### To Participate and Provide Verbal Comments on Your Computer

1. Click the following link: <https://scag.zoom.us/j/92156366986>
2. If Zoom is not already installed on your computer, click “Download & Run Zoom” on the launch page and press “Run” when prompted by your browser. If Zoom has previously been installed on your computer, please allow a few moments for the application to launch automatically.
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4. The virtual conference room will open. If you receive a message reading, “Please wait for the host to start this meeting,” simply remain in the room until the meeting begins.
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2. Enter the **Meeting ID: 921 5636 6986**, followed by #.
3. Indicate that you are a participant by pressing # to continue.
4. You will hear audio of the meeting in progress. Remain on the line if the meeting has not yet started.
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## REGIONAL ADVANCED MITIGATION PLANNING – ADVISORY TASK GROUP

### Regional Advance Mitigation Planning – Advisory Task Group *Members – K*

1. **Hon. Sean Ashton**  
Downey, RC District 25
2. **Sup. Curt Hagman**  
San Bernardino County
3. **Hon. Peggy Huang**  
TCA Representative
4. **Hon. Clint Lorimore**  
Eastvale, RC District 4
5. **Hon. David Pollock**  
EEC Chair, Moorpark, RC District 46



## REGIONAL ADVANCED MITIGATION PLANNING – ADVISORY TASK GROUP AGENDA

Southern California Association of Governments  
Remote Participation Only  
**Friday, January 28, 2022**  
**3:00 PM**

The Regional Advance Mitigation Planning - Advisory Task Group may consider and act upon any of the items on the agenda regardless of whether they are listed as Information or Action items.

### **CALL TO ORDER AND PLEDGE OF ALLEGIANCE** *(The Honorable Clint Lorimore, President)*

### **PUBLIC COMMENT PERIOD (Matters Not on the Agenda)**

This is the time for persons to comment on any matter pertinent to SCAG's jurisdiction that is *not* listed on the agenda. Although the committee may briefly respond to statements or questions, under state law, matters presented under this item cannot be discussed or acted upon at this time. Public comment for items listed on the agenda will be taken separately as further described below.

**General information for all public comments:** Members of the public are encouraged, but not required, to submit written comments by sending an email to: [scagggreenregion@scag.ca.gov](mailto:scagggreenregion@scag.ca.gov) by 5pm on Thursday, January 27, 2022. Such comments will be transmitted to members of the legislative body and posted on SCAG's website prior to the meeting. Any writings or documents provided to a majority of the Regional Advance Mitigation Planning - Advisory Task Group regarding any item on this agenda (other than writings legally exempt from public disclosure) are available at the Office of the Clerk, located at 900 Wilshire Blvd., Suite 1700, Los Angeles, CA 90017 during normal business hours and/or by contacting the office by phone, (213) 630-1420, or email to [aguilarm@scag.ca.gov](mailto:aguilarm@scag.ca.gov). Written comments received after 5pm on Thursday, January 27, 2022, will be announced and included as part of the official record of the meeting. Members of the public wishing to verbally address the Regional Advance Mitigation Planning - Advisory Task Group in real time during the meeting will be allowed up to a total of 3 minutes to speak on items on the agenda, with the presiding officer retaining discretion to adjust time limits as necessary to ensure efficient and orderly conduct of the meeting. The presiding officer has the discretion to equally reduce the time limit of all speakers based upon the number of comments received. If you desire to speak on an item listed on the agenda, please wait for the chair to call the item and then indicate your interest in offering public comment by either using the "raise hand" function on your computer or pressing \*9 on your telephone. For purpose of providing public comment for items listed on the Consent Calendar (if there is a Consent Calendar), please indicate that you wish to speak when the Consent Calendar is called; items listed on the Consent Calendar will be acted upon with one motion and there will be no separate discussion of these items unless a member of the legislative body so requests, in which event, the item will be considered separately.

### **REVIEW AND PRIORITIZE AGENDA ITEMS**



## REGIONAL ADVANCED MITIGATION PLANNING – ADVISORY TASK GROUP AGENDA

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### CONSENT CALENDAR

#### Approval

1. Minutes of the Meeting – December 10, 2021

### INFORMATION/DISCUSSION ITEM

2. Information/Discussion Items No. 2 through No. 6 15 Min.  
***(Jason Greenspan, Manager of Sustainable and Resilient Development)***
3. Regional Advanced Mitigation (RAMP) Research and Draft White Paper 25 Min.  
***(Jason Greenspan, Manager of Sustainable and Resilient Development)***
4. Presentation from Orange County Transportation Commission (OCTA) on the Freeway Environmental Mitigation Program 25 Min.  
***(Lesley Hill, Freeway Environmental Mitigation Program Project Manager, OCTA and Melanie Schlotterbeck, OCTA Environmental Oversight Committee)***
5. Presentation from Riverside Conservation Authority (RCA) Western Riverside County Multiple Species Habitat Conservation Plan 25 Min.  
***(Aaron Hake, Interim Regional Conservation Deputy Executive Director, RCA)***
6. Summary of feedback shared from interviews with County Transportation Commissions on SCAG’s upcoming Regional Advanced Mitigation Program 25 Min.  
***(Kimberly Clark, Program Manager II of Resource Conservation & Resilient Communities)***

### ADJOURNMENT



Southern California Association of Governments  
Remote Participation Only  
January 28, 2022

**MINUTES OF THE MEETING  
REGIONAL ADVANCED MITIGATION PLANNING –  
ADVISORY TASK GROUP (RAMP-ATG)  
FRIDAY, DECEMBER 10, 2021**

THE FOLLOWING MINUTES IS A SUMMARY OF ACTIONS TAKEN BY THE REGIONAL ADVANCED MITIGATION PLANNING - ADVISORY TASK GROUP (RAMP-ATG). A VIDEO AND AUDIO RECORDING OF THE ACTUAL MEETING IS AVAILABLE AT: <http://scag.iqm2.com/Citizens/>.

The Regional Advanced Mitigation Planning - Advisory Task Group (RAMP-ATG) of the Southern California Association of Governments (SCAG) held its meeting virtually (telephonically and electronically), given the declared state of emergency (pursuant to State of Emergency Proclamation dated March 4, 2020) and local public health directives imposing and recommending social distancing measures due to the threat of COVID-19, and pursuant to Government Code Section 54953(e)(1)(A). A quorum was present.

**Members Present**

<b>Hon. Clint Lorimore, President, Chair</b>	<b><i>Eastvale</i></b>	<b>District 4</b>
Hon. Sean Ashton, Chair, TC	<i>Downey</i>	District 25
Hon. Curt Hagman		San Bernardino County
Hon. Peggy Huang, Vice Chair, LCMC		TCA
Hon. David Pollock, Chair, EEC	<b>Moorpark</b>	District 46

**Staff Present**

Kome Ajise, Executive Director  
Sarah Jepson, Director of Planning  
Javiera Cartagena, Director of Government and Public Affairs  
Michael Houston, Chief Counsel, Director of Legal Services  
Maggie Aguilar, Clerk of the Board

**CALL TO ORDER AND PLEDGE OF ALLEGIANCE**

The Honorable Clint Lorimore called the meeting to order at 3:01 p.m. President Lorimore asked Supervisor Curt Hagman, San Bernadino County, to lead the Pledge of Allegiance.



Given the declared state of emergency (pursuant to State of Emergency Proclamation dated March 4, 2020) and local public health directives imposing and recommending social distancing measures due to the threat of COVID-19, and pursuant to Government Code Section 54953(e)(1)(A), President Lorimore announced the meeting was being held virtually (telephonically and electronically).

**PUBLIC COMMENT PERIOD**

President Lorimore opened the Public Comment Period and outlined instructions for public comments. He noted this was the time for persons to comment on any matter pertinent to SCAG’s jurisdiction that were not listed on the agenda.

Chief Counsel Michael Houston acknowledged there were two written public comments received by email before the 5 p.m. deadline and that no written public comments had been received by email after the 5 p.m. deadline.

Rich Lambros, Southern California Leadership Council, thanked the RAMP-ATG members for taking the time to form this taskforce and for all the time they will be putting in on this important issue over the next few months. He stated they looked forward to working with them all.

President Lorimore reminded the public to submit comments via email to [scaggreenregion@scag.ca.gov](mailto:scaggreenregion@scag.ca.gov).

Seeing no public comment speakers, President Lorimore closed the Public Comment Period.

**REVIEW AND PRIORITIZE AGENDA ITEMS**

There was no prioritization of agenda items.

President Lorimore provided a brief overview on the background of how they got to this point. He reported that in October, SCAG’s Regional Council voted to continue the pause on implementation of the SoCal Greenprint, and during this pause, direction was provided for SCAG staff to develop a white paper and work with a five-member advisory task group of the Regional Council on establishing a policy framework for advance mitigation in the SCAG region to ensure the SoCal Greenprint was aligned with policy objectives. He noted that on November 4<sup>th</sup>, he announced the appointment of Hon. Sean Ashton, Hon. Curt Hagman, Hon. Peggy Huang, and Hon. David Pollock to serve on the advisory task group. He further noted that in addition to establishing a policy framework, this group would advise on a white paper on Regional Advance Mitigation Planning and that the group would disband upon reporting to both the Regional Council and Energy & Environment Committee, which is expected to occur in April 2022.

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**ACTION ITEM**

1. Selection of Chair

President Lorimore opened the Public Comment Period.

Seeing no public comment speakers, President Lorimore closed the Public Comment Period.

A MOTION was made (Pollock) to nominate Clint Lorimore as Chair to the RAMP-ATG. Motion was SECONDED (Huang) and passed by the following votes:

**AYES:** Ashton, Hagman, Huang, Lorimore, and Pollock (5)

**NOES:** None (0)

**ABSTAIN:** None (0)

**INFORMATION/DISCUSSION ITEM**

2. SCAG Welcome and Update

President Lorimore opened the Public Comment Period.

Seeing no public comment speakers, President Lorimore closed the Public Comment Period.

Sarah Jepson, Planning Director, stated she acknowledged and appreciated that they had some good discussions on the Greenprint over the last six to nine months and that staff takes that feedback very seriously. She expressed that they were glad to have this opportunity to take a step back to make sure that when the pause is lifted and as they develop the project moving forward, that they are doing it in a way that best supports the policy objectives that were established in Connect SoCal and the Programmatic Environmental Impact Report (PEIR). Most importantly, that this Greenprint tool that they are developing becomes most useful for the cities, counties, and transportation agencies. She reported that this meeting was to help them set a strong foundation for the RAMP-ATG. She noted that staff would be going through the background information, in addition to discussing the meeting schedule and outlining the issues they planned to discuss at future meetings so that they were all on the same page.

Regional Councilmember Curt Hagman, San Bernardino County, stated he was really looking forward to getting into the mechanics of this and what their due diligence is. He indicated it would be helpful to start with the basic building blocks and work their way through this.

Regional Councilmember Peggy Huang, TCA, stated their work here was important, and was looking forward to working with everyone. She stated this was a very important document and policy that they needed as part of their RTP.

### 3. Discussion on the Purpose, Goals, and Structure of the Regional Advance Mitigation Planning - Advisory Task Group (RAMP-ATG)

President Lorimore opened the Public Comment Period.

Seeing no public comment speakers, President Lorimore closed the Public Comment Period.

Jason Greenspan, Manager of Sustainable and Resilient Development provided a brief update on the vote taken by the Regional Council on October 7, to support the staff recommendation and continue the pause on the implementation of the SoCal Greenprint, allowing further engagement with stakeholders to ensure the tool advances PEIR mitigation measures and is aligned with regional policy objectives. He noted that during this pause on implementation, there were a number of ongoing steps underway as directed by the Regional Council, which included the 1) RAMP-ATG helping to establish a policy framework and white paper for advance mitigation; 2) continuing to develop the Greenprint tool with focus on maximizing benefits to cities, counties and transportation agencies; 3) reviewing and revising proposed Greenprint data layers with feedback from strategic and scientific advisors, stakeholders, and this advisory task group; 4) conducting some user testing in 2022; 5) developing a disclosure statement and user acknowledgement; and 6) returning to the Regional Council later in 2022 to seek feedback and remove the implementation pause. He also noted that they planned for the RAMP-ATG to meet 4 times between December and March 2022.

He briefly described Regional Advance Mitigation Planning as a science-based approach to identify mitigation opportunities to support regional conservation priorities. He noted that by considering mitigation development early in the planning process, prior to design and permitting phases, proponents can identify higher-quality mitigation opportunities. He also noted that advance mitigation planning can save on project costs and time for implementing agencies, helping them meet mitigation requirements early in the process and provide certainty for development. He also noted how Connect SoCal, which was adopted by the Regional Council in late 2020, discusses regional advance mitigation. He highlighted that SCAG was obligated to meet the requirements of the mitigation measures included in Connect SoCal's adopted PEIR, and that one mitigation measure related to the region's biological resources was to establish a new RAMP initiative to preserve habitat. He further noted that to assist in defining the RAMP, SCAG would lead a multi-year effort to develop new regional tools, like the Regional Data Platform and the Greenprint, with the Greenprint effort producing a whitepaper on the RAMP initiative. Additionally, that SCAG will use the Greenprint to identify priority conservation areas and work with County Transportation

Commissions to develop advanced mitigation programs or include them in future transportation measures.

Lastly, he reported that the SoCal Greenprint was an important first step in the formation of a RAMP and that through the Greenprint, stakeholders would be able to more easily identify lands to prioritize for growth and conservation based on principles such as connectivity, ecological function, endangered species habitats, climate resilience, and biodiversity. Further, that the Greenprint would also include themes and data sets that will supplement regional advance mitigation, such as environmental justice and built environment data. He noted that this would increase the tool's relevance and utility for many SCAG stakeholders and communities, some of which may be more urbanized or have needs in addition to advance mitigation such as planning for housing production or utility infrastructure. He further noted that it was important to ensure the Greenprint remains focused on consistency with SCAG's Equity and Climate Change Resolutions and to recognize that stakeholders strongly advocated for a broad range of data throughout the yearlong outreach process.

Regional Councilmember Hagman expressed that they needed to focus on the process and the governance of the Greenprint before the data and information can go into it. Mr. Greenspan acknowledged Regional Councilmember Hagman's comment. Regional Councilmember Hagman further noted that they needed a good process that they can follow so that they can take it to the board and say that this is the process for data to come together.

President Lorimore requested that all the information on the Greenprint be placed in a centralized location for them to be able to access. He asked staff to add a link on the next agenda.

#### 4. Review of the Anticipated Agendas and Dates for the Next Three Meetings

President Lorimore opened the Public Comment Period.

Seeing no public comment speakers, President Lorimore closed the Public Comment Period.

Jason Greenspan, Manager of Sustainable and Resilient Development provided a brief overview of the content they would be covering over the four proposed meetings of the RAMP-ATG. He indicated this meeting was to help people get familiar with the content. For the January meeting, he indicated that they thought it would be very valuable to 1) have some of their partner agencies speak to this group about how advanced mitigation is helping them with their infrastructure in expediting permitting and construction funding; 2) would review some of the feedback they had received from their interviews with the County Transportation Commission's as they had been working on a white paper; 3) review some of the strategies, goals and PEIR mitigation measures; and 4) get some feedback from the RAMP-ATG and provide them with the draft outline of the white

paper. For the February meeting, he stated they would have a second presentation from another partner agency, and then start working on those recommendations for a policy framework for advanced mitigation, so that they can make sure that the data layers for the Greenprint have a rational nexus. For the March meeting, he stated they would look at the draft white paper and get their feedback so they can finalize those recommendations for a policy framework for advanced mitigation, and hopefully then advance that to the Energy and Environment Committee (EEC) and the Regional Council for their consideration and potential action in April. Lastly, he noted that: 1) in May, they would finalize the list of data layers based on feedback from their strategic and scientific advisors, stakeholders and RAMP-ATG members; 2) in June and August of 2022, they would complete the draft tool and conduct user testing; and 3) in October, they would present the tool to the Regional Council and the EEC for consideration of removing the pause.

Regional Councilmember Hagman indicated he would like to have a better understanding of the basic framework of the Greenprint and asked for a meeting with staff to better understand the background on the Greenprint. He also noted that he did not see anything on the governance or process for this and stated it would be helpful. Mr. Greenspan acknowledged the request.

President Lorimore reiterated the need to have a centralized location for them to access all information on Greenprint.

Regional Councilmember Huang stated she agreed with both President Lorimore and Regional Councilmember Hagman and asked if they could have a separate tab like they did for Regional Housing Needs Assessment (RHNA) [on the website] where they can access information. She also asked what kind of role the Nature Conservancy would play in these sessions as many concerns were expressed and if they wanted to continue with them or look for other consultants. Mr. Greenspan acknowledge the question and indicated they could provide more detail on the scope of their work.

Regional Councilmember Sean Ashton stated he would also like a similar briefing as requested by Regional Councilmember Hagman so that he has a better understanding of the Greenprint.

Regional Councilmember Hagman stated that since three members were requesting a briefing then perhaps they could have a meeting to get into the basics of the Greenprint as he realized they could not have the discussion on this day as it was a Brown Act meeting. President Lorimore and Regional Councilmembers Ashton and Pollock agreed.

President Lorimore asked if the dates had been confirmed for the next meetings as it appeared that they were going to try and add another meeting in January, assuming schedules permitted. Mr. Greenspan acknowledged the question and indicated they would be working with the Clerk on everyone's schedules.

President Lorimore asked if the RAMP-ATG would not be discussing data points.

Mr. Greenspan acknowledge the question and stated that he thought it was important for the RAMP-ATG to discuss data and ensure that that there was a nexus between what the tool would be providing and the data that would be in the Greenprint itself. He also noted that they did have a section on the Greenprint on the website, with a lot of information posted and would make sure the RAMP-ATG had the link.

Regional Councilmember Huang indicated that there was a lot of discussion on the data points. She stated that she thought that it may be worthwhile to somehow categorize the datasets and that they really needed to look at the ones that were proposed.

Ms. Jepson acknowledged Regional Councilmember Huang's comment and stated that the goal of the policy framework was to set up the larger governance structure, so that they can have their technical experts select the right type of data to fit into the tool. She further stated that they anticipated that this group would be providing the parameters around the data and that will be part of the discussion.

Regional Councilmember Pollock stated that he understood that one of the main purposes of this group was really to make sure they have a common understanding of what it is and how it's going to be used.

President Lorimore asked how they came up with the group of advisors. Mr. Greenspan acknowledge the question and noted that the group of advisors was convened in January 2020 which consisted of both policy and science advisors, and included universities as well.

Kome Ajise, Executive Director, noted that it was not unusual for them [SCAG] to convene panels of experts on different topics.

Regional Councilmember Hagman stated he appreciated the opportunity for the board to weigh in on policy. He asked about the schedule and the need to meet certain obligations. He indicated this was their opportunity to make peace with two divided camps. He further stated that he was in agreement that they should not have to go through 160 data sets because they never talked about the requirements.

Executive Director Ajise acknowledged Regional Councilmember Hagman's comments and stated staff would be prepared to staff them as needed. He clarified that what they were trying to do with the RAMP-ATG was create a policy that drives where this tool is going to be. He further stated that the tool was secondary to this conversation because it was a larger policy discussion. He noted that

he thought that Regional Councilmember Hagman’s request to do a deep dive into the governing authority was very good instinct, and that would be part of their next meeting.

President Lorimore stated they were going to remain flexible, but that they were already talking about adding another meeting and would take issues as they came up. He noted there had been some concerns regarding data points and that they needed to talk about some of the ones they had received feedback on before they disband the RAMP-ATG.

Regional Councilmember Huang stated she was very committed to this process to make sure they get it right because it was important for the region. She stated she also had concerns about the data points and there was some need to go through it to make sure it was relevant to the Greenprint.

Executive Director Ajise stated that the data points were already published and available for people to look at. He stated it would make sense to have the conversation at some point about datasets in categories. He further noted that over time, those data sets had been refined based on the input that they had received from various stakeholders.

President Lorimore stated that they needed to talk about the data points at some point with the end goal being the white paper.

Regional Councilmember Hagman asked that they also discuss a process for how they add or take off data.

The RAMP-ATG members engaged in discussions regarding the scheduling of the next meeting.

**ADJOURNMENT**

There being no further business, President Lorimore adjourned the Regular Meeting of the Regional Advanced Mitigation Planning - Advisory Task Group at 4:14 p.m.

[MINUTES ARE UNOFFICIAL UNTIL APPROVED BY THE RAMP-ATG]

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Southern California Association of Governments  
Remote Participation Only  
January 28<sup>th</sup> 2022

**To:** Regional Advance Mitigation Planning – Advisory Task Group  
(RAMP-ATG)

EXECUTIVE DIRECTOR'S  
APPROVAL

**From:** Jason Greenspan, Manager of Sustainability  
(213) 236-1859, [greenspan@scag.ca.gov](mailto:greenspan@scag.ca.gov)

**Subject:** Information/Discussion Items No. 2 through No. 6

**RECOMMENDED ACTION FOR RAMP-ATG:**

Information Only – No Action Required

**STRATEGIC PLAN:**

This item supports the following Strategic Plan Goal 3: Be the foremost data information hub for the region.

**EXECUTIVE SUMMARY:**

This report contains a summary of attached documents for the January 28<sup>th</sup> Meeting.

**BACKGROUND:**

The attachments for the January 28<sup>th</sup> RAMP-ATG meeting include reference documents for discussion items 2 through 6, as well as documents from the October 7<sup>th</sup> 2021 Regional Council meeting that provide background information on the origins of the SoCal Greenprint and stakeholder comments. Inclusion of these documents is to fulfill the request made at the December 10<sup>th</sup>, 2021 meeting to include more background information about the SoCal Greenprint in the next meeting's agenda.

Additionally, SCAG staff have posted a comprehensive repository of past Greenprint staff reports, presentations, public hearings, and meeting minutes dating back to 2018 on the SoCal Greenprint website, which can be found at this link: <https://scag.ca.gov/gis-socal-greenprint/staff-reports-presentations-and-documents>.

For further information, RAMP-ATG members are invited to refer to the Greenprint Newsletters, which are archived on the website at this link: <https://scag.ca.gov/pod/socal-greenprint-newsletter>.

The following chart provides a table of contents and a description of the attached documents:

Document	Description
<p>Agenda Item #2 – Information/Discussion Items No. 2 through No. 6</p>	<p><u>Oct 7<sup>th</sup> Regional Council Greenprint Staff Report and Attachments</u>            This staff report provides background on the SoCal Greenprint, an overview of outreach conducted prior to and after the July 1st Regional Council vote; a summary of feedback received from stakeholders; SCAG’s response to common stakeholder concerns; and proposed next steps to address stakeholder concerns. A comprehensive report in response to the Regional Council’s July 1 direction and actions pursued is included as ATTACHMENT A (which includes, among other things, responses to a number of concerns expressed during the public outreach process), along with ATTACHMENTS B, C, D, E, F and G as referenced in this report.</p> <p><u>Email Regarding Updated Presentation</u>            Email informing RC and EEC members about updated presentation for the October 7<sup>th</sup> meeting that was not included as an attachment in the original staff report.</p> <p><u>Updated October 7<sup>th</sup> RC &amp; EEC Presentation on SoCal Greenprint</u>            SCAG staff presentation to RC and EEC on SoCal Greenprint that includes updated staff recommendation to continue pause on the SoCal Greenprint</p> <p><u>Email Regarding Supplemental Staff Report</u>            Email informing RC and EEC members about supplemental staff report that includes revised staff recommendation to continue pause on SoCal Greenprint.</p> <p><u>Supplemental Staff Report</u></p>

	<p>Supplemental staff report for October 7<sup>th</sup> RC and EEC meeting with revised recommended action to continue pause on SoCal Greenprint.</p> <p><u>Public Comments Received before 5pm</u> Public comments received prior to the 5pm deadline on October 6<sup>th</sup>.</p> <p><u>Public Comments Received after 5pm</u> Public comments received after to the 5pm deadline on October 6<sup>th</sup>.</p>
<p>Agenda Item #3 – Regional Advanced Mitigation (RAMP) Research and Draft White Paper Outline</p>	<p>Current draft outline of the RAMP white paper for RAMP-ATG review.</p>
<p>Agenda Item #4 - Presentation from Orange County Transportation Commission (OCTA) on the Freeway Environmental Mitigation Program</p>	<p>Fact sheet on OCTA’s Freeway Environmental Mitigation Program to accompany presentation. Example of existing RAMP best practice in the region.</p>
<p>Agenda Item #5 – Presentation from Riverside Conservation Authority (RCA) Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP)</p>	<p>Fact Sheet on RCA’s Multiple Species Habitat Conservation Program to accompany presentation. Example of existing RAMP best practice in the region.</p>
<p>Agenda Item #6 - Summary of feedback shared from interviews with County Transportation Commissions and transportation providers on SCAG’s upcoming Regional Advanced Mitigation Program</p>	<p>Summary of interviews conducted with CTCs, Caltrans and other agencies about potential RAMP in the SCAG region. Interviews we conducted as research for the RAMP white paper.</p>

**FISCAL IMPACT:**

This project is funded in SCAG’s Fiscal Year 2021-2022 Overall Work Program under 290-4862.01 and 290-4862.02.

**ATTACHMENT(S):**

1. Oct 7<sup>th</sup> Regional Council Greenprint Staff Report and Attachments
2. Email Regarding Updated Presentation
3. Updated October 7<sup>th</sup> RC & EEC Presentation on SoCal Greenprint
4. Email Regarding Supplemental Staff Report
5. Supplemental Staff Report
6. Email Regarding Public Comments before 5pm



- 
7. Public Comments Received before 5pm
  8. Email Regarding Public Comments after 5pm
  9. Public Comments Received after 5pm



**REPORT**

Southern California Association of Governments  
Remote Participation Only  
**October 7, 2021**

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**To:** Energy & Environment Committee (EEC)  
Regional Council (RC)

**From:** Jason Greenspan, Manager of Sustainability  
(213) 236-1859, greenspan@scag.ca.gov

**Subject:** SoCal Greenprint Update

**EXECUTIVE DIRECTOR'S  
APPROVAL**

A handwritten signature in blue ink that reads "Kome Ajise". The signature is written in a cursive, flowing style.

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**RECOMMENDED ACTION FOR EEC:**

Information Only – No Action Required

**RECOMMENDED ACTION FOR RC:**

Staff recommends that the Regional Council remove the pause on Greenprint implementation as directed on July 1, 2021, and direct staff to:

1. Proceed with developing the SoCal Greenprint as identified in Connect SoCal and its associated Program Environmental Impact Report (PEIR);
2. Include features in the SoCal Greenprint to convey limitations and foster its proper use, such as a disclosure statement and mandatory user acknowledgement feature;
3. Conduct an open advisory meeting for further review and revision of data layers;
4. Remove datasets for inclusion in the tool if they are not publicly available (i.e. layers are accessible for download online, or are downloadable via request and/or license to the author or custodian of the data);
5. Complete prospective user testing with at least ten stakeholders representing the diverse array of potential users to ensure that the tool is working and functional as developed with targeted audiences;
6. Engage in continued public outreach as described at the July 1, 2021 RC meeting; and
7. Return to the Regional Council and Energy & Environment Committee once prospective user testing is complete to demonstrate the tool and seek feedback prior to public launch.

**STRATEGIC PLAN:**

This item supports the following Strategic Plan Goal 3: Be the foremost data information hub for the region.

**EXECUTIVE SUMMARY:**

*SCAG is in the process of developing the SoCal Greenprint tool as an optional, flexible, and open regional conservation-focused data and mapping tool for the six counties in the SCAG region. The SoCal Greenprint provides information to support integrated planning to advance Connect SoCal's housing, transportation and conservation goals; its development is also a program-wide mitigation measure in the Connect SoCal PEIR.*

*On July 1st, 2021, the Regional Council voted to pause implementation of the SoCal Greenprint for at least 30 days and to hold a public hearing for further discussion, thus permitting staff to engage in additional outreach with stakeholders to understand their concerns with implementing the tool. The October 7, 2021 Regional Council meeting includes a noticed public hearing, which along with the public hearing conducted on August 24<sup>th</sup>, 2021, ensures that SCAG staff meets and exceeds the direction from Regional Council.*

*The additional outreach pursued since July 1 (including a data survey, public hearing and one-on-one meetings with various stakeholders and stakeholder groups) has focused on better understanding concerns related to the data shared through the tool and the tool's operability. Data is divided into six themes: Agriculture & Working Lands, Biodiversity & Habitat, Built Environment, Environmental Justice, Equity and Inclusion, Vulnerabilities and Ecological Resilience, and Water Resources, with specific data sets identified within each theme to address the information needs of developers, local planners, infrastructure agencies, community-based organizations, and conservation professionals. The feedback on the data layers themselves, while largely supportive, has also included specific concern relating to data types and data sources that has helped SCAG identify several data sets to remove or for reconsideration to ensure alignment with the goals of the project. However, the majority of the input received has been general in nature, either in support or opposition to the project.*

*To address concerns raised by stakeholders expressing concern with the project or its scope (including concerns relating to the tool's impacts on housing production and local agency planning efforts), staff has outlined a series of actions in the recommendation that staff will pursue once the pause is lifted and as the tool is developed. These changes to the tool and its development process were informed by additional analysis of feedback received from stakeholders. Further, in response to concerns expressed by some stakeholders, SCAG received outside legal opinion of, Margaret M. Sohagi, Esq., the principal of The Sohagi Law Group, an expert in counseling public agencies on CEQA. Per the attached analysis (ATTACHMENT F), Ms. Sohagi concludes that "the Greenprint does not disrupt the traditional CEQA process in any way, nor does it interfere with a public agency's exercise of discretion when evaluating projects under CEQA. Specifically, the Greenprint is not, by itself, evidence of new information that would trigger additional CEQA review."*

*Staff is recommending the pause be lifted (along with those other actions contained in the recommendation) to allow for the completion of the Greenprint tool to support integrated*

***planning and project delivery that advances Connect SoCal's housing, transportation and conservation goals, while also meeting the program-wide mitigation measure requirements in the Connect SoCal PEIR.***

***This staff report provides background on the SoCal Greenprint, an overview of outreach conducted prior to and after the July 1<sup>st</sup> Regional Council vote; a summary of feedback received from stakeholders; SCAG's response to common stakeholder concerns; and proposed next steps to address stakeholder concerns. A comprehensive report in response to the Regional Council's July 1 direction and actions pursued is included as ATTACHMENT A (which includes, among other things, responses to a number of concerns expressed during the public outreach process), along with ATTACHMENTS B, C, D, E, F and G as referenced in this report.***

## **BACKGROUND:**

### **Project Purpose & Goals**

Development of the SoCal Greenprint tool commenced in January 2020 to provide information that can help a wide-range of stakeholders including developers, local planners, infrastructure agencies, community-based organizations, and conservation professionals integrate the protection of natural and agricultural resources into land use and infrastructure plans. The goals of the project are to:

- Balance regional growth with the multiple challenges affecting Southern California such as drought, climate change, and habitat loss;
- Better prioritize lands for mitigation that have regional conservation benefits;
- Accommodate infrastructure development while protecting important natural resources;
- Address the lack of consistent, regional data and tools that can be used across sectors to assess land use decisions transparently and objectively; and
- Help guide conservation investments and communicate the multiple benefits of natural resources, agricultural lands, and urban greening to people and communities.

Once completed, the SoCal Greenprint can serve as an optional, flexible, and open regional conservation-focused data and mapping tool for the six counties in the SCAG region. It can also expedite project delivery and reduce uncertainty by identifying potential environmental issues early in project development, which can be especially beneficial for under-resourced local agencies.

The SoCal Greenprint advances Connect SoCal's specified goals to "promote conservation of natural and agricultural lands and restoration of habitats" and to balance the region's need for increased housing production with environmental protection. Development of the SoCal Greenprint is also required by mitigation measures of Connect SoCal's Program Environmental Impact Report (PEIR), which state that SCAG shall develop and use the Greenprint to identify priority conservation areas in support of advanced mitigation efforts in the region (SMM AG-2) and that new regional tools like the Greenprint will provide an easily accessible resource to help municipalities, conservation

groups, developers and researchers prioritize lands for conservation based on the best available scientific data (SMM BIO-2).

Importantly, these mitigation measures apply only to SCAG, and nothing in the PEIR supersedes existing regulations and policies of individual jurisdictions. Since SCAG has no authority to impose mitigation measures, mitigation measures to be implemented by local jurisdictions in their own processing of projects are subject to a lead agency's independent discretion as to whether measures are applicable to projects in their respective jurisdictions. Lead agencies are under no obligation to use measures identified in the PEIR. The determination of significance and identification of appropriate mitigation under the California Environmental Quality Act (CEQA) is solely the responsibility of the lead agency.

### **Scope of Work & Project Deliverables**

In 2019 SCAG entered into a contract with The Nature Conservancy (TNC) to secure assistance in developing the SoCal Greenprint based on their extensive experience and expertise in developing Greenprints in California. They have been actively involved in helping staff achieve project objectives including engaging stakeholders; work plan development; identification of themes; existing dataset collection; data framework development; web-based tool development; and identification of next steps and resources.

Stakeholder engagement has been a key component of tool development since the project launched in 2020 and has featured several rounds of feedback and input from a diverse group of stakeholders in the fields of planning, land development, transportation, infrastructure, conservation, and community services organizations. The project's first year entailed extensive, targeted outreach to stakeholders to gain insight on the tool's potential key stakeholders, uses, main themes, and the most useful datasets to include. More than 60 organizations, representing every county in the SCAG region, have participated in the development process. Eighteen science advisors from regional universities, conservation entities, and museums have also provided guidance to ensure that the best available scientific data is utilized in the tool.

This input has helped inform the data identified for potential inclusion available to view in the Greenprint. In addition, all data sources must meet all the following criteria:

- Data must be publicly available, meaning that existing datasets are available online or can be accessed if requested and/or licensed;
- Data was vetted for inclusion by the SoCal Greenprint Scientific Advisors; and
- Data would support decision-making from the five key user groups identified through the planning process (planners, infrastructure agencies, developers, community-based organizations, and conservation organizations) based on suggestions and feedback from Science and Strategic Advisors.

Importantly, stakeholder engagement helped match user needs with data availability. For example, developers and builders indicated that it would be useful to understand where existing infrastructure such as utility lines are located to make it easier to understand where it would be more efficient and affordable to build new development. Other data additions made by stakeholder input include data from CalEnviroScreen that helps local leaders understand the relationship between socioeconomic factors and environmental hazards. For additional information on the SoCal Greenprint's data vetting process, please refer to **ATTACHMENT G**.

Each dataset will be used in the same way on the SoCal Greenprint platform to view data by one of several methods: (1) webmaps with individual/combined layers, (2) multi-benefit asset maps that combine data layers by theme, and (3) summary reports that explain data outputs for a user-generated area. Further explanation of each feature is described as follows:

1. An interactive webmap function will allow users to view any individual data layer on its own, or a combination of layers. Users turn on and turn off layers, or can adjust transparency based on what's important to them. These layers are already publicly available and downloadable from existing resources, either online or via request to the author or custodian of the data. The map merely permits users to aggregate these available data sets in a customizable and easy to use fashion. Layers will be shown in their native versions, and will not be altered;
2. Multi-benefit asset maps combine data layers along a common theme, and are used for visualization purposes. The application of this data is flexible and priorities are user driven, as users can toggle transparencies to see how benefits within that data theme vary by area based on what's important to them. This enables users to view data based on their unique needs and perspectives; and
3. Users can access summary reports for an area by drawing boundaries in the application or adding a shapefile with boundaries. The tool will generate reports summarizing underlying data elements in the area, and users can compare two areas side-by-side if desired. Summary reports and the underlying data will be available for download.

Beyond sorting data sets into relevant themes (Agriculture & Working Lands, Biodiversity & Habitat, Built Environment, Environmental Justice, Equity and Inclusion, Vulnerabilities and Ecological Resilience, and Water Resources), there is no separate or special use for individual datasets and the "use" of the data to populate the maps or summary reports will be based on users' selections.

#### **Regional Council Direction, Staff Activities and Findings**

On July 1st, 2021 the Regional Council voted to pause implementation on the SoCal Greenprint for at least 30 days and to hold a public hearing at a future date for further discussion, permitting staff to engage in further outreach with stakeholders. In adherence to the Regional Council's direction, SCAG staff and the project consultant, TNC, have continued to engage stakeholders and have solicited feedback on the tool as well as the proposed datasets in multiple formats – principally,

through a stakeholder survey on the proposed data layer list, a public hearing on the tool, and one-on-one meetings with various stakeholder groups expressing concern and/or support for implementation of the tool.

#### *Stakeholder Survey*

On July 19, the SoCal Greenprint's Proposed Data Layer List (**ATTACHMENT C**) list was posted online, and stakeholders were invited to provide feedback on specific data layers through a survey. This data listing currently provides background information on the proposed individual data layers that draw from diverse sources, including public agencies, universities, non-profit organizations, amongst others. Data is divided into six themes: Agriculture & Working Lands, Biodiversity & Habitat, Built Environment, Environmental Justice, Equity and Inclusion, Vulnerabilities and Ecological Resilience, and Water Resources.

The survey was distributed widely and made publicly available between July 19 and August 13, 2021. SCAG sent the survey to more than 4,200 people, including all SoCal Greenprint advisors, city managers, clerks, council members, mayors, planning directors, planning staff, public works directors, representatives from the building industry, business councils, chambers of commerce, and others. The survey was also published on SCAG's website for any stakeholder or member of the public to access. Results of the survey show that:

- Thirty-three respondents submitted the survey. Users could comment on one or more layers, with 69 survey comments addressing 45 different data layers;
- Feedback on the data layers was generally positive: 75% of comments were supportive of the data layer(s), 13% offered suggestions to improve data layer(s) or consider additional data, 3% expressed a concern over the data layer(s), and no comments through the survey requested exclusion of specific data layer(s). Letters provided in lieu of the survey before the deadline identified less than five data layers with potential issues;
- When asked for feedback on concerns about the goal of the SoCal Greenprint, 53% of respondents reported no concerns about the goal and no respondents reported concerns. However, 12% of respondents expressed concerns over pausing or not completing the project and 18% of respondents expressed other concerns; and,
- When asked for feedback on general concerns about the SoCal Greenprint, 47% of respondents expressed concern over pausing or not completing the project, 27% expressed concern over the data content, 13% expressed other concern, and 13% expressed no concern.

Some stakeholders opted to provide written feedback on data layers independent of the survey. These letters frequently requested that data and layers generated by universities and non-profit entities be removed from the tool. A request was also made for the tool's function to be narrowed so that it would apply only to lands designated for open space or agricultural uses in local general

plans, and exclude lands where transportation projects have been included in Connect SoCal. Analysis and response to these concerns, along with a number of others identified below, is included in **ATTACHMENT A**.

#### *August 24<sup>th</sup> Public Hearing*

SCAG held the first of two planned public hearings on August 24th, 2021 from 4pm to 6pm. After a presentation on the SoCal Greenprint from SCAG Staff, stakeholders had the opportunity to provide verbal comments. Written comments were also accepted from July 28th through the close of the hearing. A recording of the hearing can be found on the SCAG website, and written comments can be found in **ATTACHMENT B**.

A total of 34 speakers participated in the public hearing. An equal number of comments expressed support for the project to those who expressed concerns. Specifically:

- 41% expressed support;
- 41% expressed concerns;
- 9% expressed support and concerns; and
- 9% had general feedback or questions

Additionally, a total of 39 comment letters were received. Of the 39 letters, there were 35 unique respondents/letters. A significant majority of the comment letters received were supportive of the project.

- Of the 35 letters, 74% of letters were supportive and 26% expressed concerns;
- Most letters did not address specific data layers and provided more general comments and/or concerns; and
- Of the 35 letters, 17% of letters addressed specific data layers and 2 letters requested including additional data layers.

Common general concerns included:

- Broken or inaccessible links to background information on the data layers, which were subsequently repaired and reposted by SCAG on September 14, 2021;
- Inclusion of non-governmental data sets;
- Data credibility and transparency;
- Process challenges such as CEQA litigation;
- Perceived conflicts with other regional development goals; and,
- Exclusion or inclusion of certain data.

Common general comments included: support for the inclusion of an equity section and data; reiteration of the SoCal Greenprint's goals and expectations; expected housing and transportation service needs; support to advance sustainable development and conservation amid environmental challenges (e.g., climate change); and the importance of including data on essential infrastructure, natural resources, and climate change impacts.

### *Stakeholder Meetings*

SCAG staff made presentations on the SoCal Greenprint to the Technical Working Group (TWG) on July 15 and September 30, and hosted a special hour-long workshop for TWG members on July 29. At this workshop, participants were given an in-depth overview of the data and technical aspects of the tool and had an extended question and answer period with SCAG and TNC staff. SCAG staff also made a presentation on the SoCal Greenprint to the Global Land Use & Economic (GLUE) Council meeting on August 9, and included the topic on their October 4 meeting agenda. Members were invited to provide feedback.

SCAG staff and leadership have also been engaging in one-on-one meetings with stakeholders. On August 16, SCAG's Board Officers and staff met with representatives from the building industry, with a follow-up meeting on September 13. Building industry representatives expressed concerns about moving forward the Greenprint without reevaluating several of its proposed data layers and expressed concern in having the tool include lands designated for open space or agricultural uses in local general plans, and exclude lands where transportation projects have been included in Connect SoCal. On August 18, SCAG's Board Officers and staff met with representatives of environmental and architecture organizations, who emphasized the importance of removing the current pause on tool implementation and developing the Greenprint as identified in Connect SoCal and the PEIR.

TNC and SCAG staff have also met with stakeholders who responded to the survey to address any questions about the Proposed Data List and listen to comments and concerns about proposed data layers.

### **Proposed Next Steps in Response to Stakeholder Concerns**

Staff is recommending the pause be lifted to allow the project team to pursue a series of activities in response to stakeholder concerns and complete the Greenprint tool, as further described below and contained in the staff recommendation:

#### *Removal of Certain Data Layers*

As previously noted, the complete list of proposed data layers has been made publicly available and SCAG collected feedback via survey on the inclusion of individual layers (**ATTACHMENT C & D**). The Proposed Data Layer List is not final, and SCAG staff is actively evaluating stakeholder comments and concerns about specific data sets. SCAG will consider removal or replacement of certain data layers with alternative datasets based on the recommendations and concerns raised by stakeholders. Ultimately, SCAG staff, in consultation with the SoCal Greenprint's Scientific and Strategic Advisory Committees, will determine which proposed data layers will be available in the Greenprint tool.

After hearing concerns from stakeholders and applying data vetting criteria, SCAG staff have decided to remove the Antelope Valley Regional Conservation Investment Strategy (AVRCIS) Cores

and Linkages dataset from consideration for the final list of data layers. This decision was made since the AVRCIS has not received approval from the California Department of Fish and Wildlife.

It is important to emphasize that over 50 data sets were removed from consideration prior to the release of the Proposed Data Layer List for a number of reasons, including but not limited to:

- Datasets did not meet the criteria listed above;
- Advisors noted concerns about limitations or incompleteness of the data; and
- Data elements could be replaced with a similar, but superior dataset

The full list of data sets removed from consideration for the Proposed Data Layer list can be found in **ATTACHMENT E**.

#### *Expanded Stakeholder Engagement & User Testing*

After revising the Proposed Data Layer List according to stakeholder feedback, SCAG staff will present the revised list to the Technical Working Group (TWG) for further consultation on revisions to data layers for inclusion in the tool. The Charter for the Technical Working Group can be found on SCAG's webpage at <https://scag.ca.gov/technical-working-group>. After receiving feedback from the TWG, SCAG will make recommendations for layer adjustments and subsequently seek feedback from project stakeholders and Scientific Advisors at an open project Advisory Committee meeting. From there, SCAG staff will determine the final list of data layers to include in the SoCal Greenprint.

SCAG will then conduct User Acceptance Testing (UAT), specifically live application beta testing, where at least 10 targeted stakeholders will test a draft version of the tool to identify any issues with functionality before it is completed and publicly launched. Included in the SoCal Greenprint's Scope of Work, User Acceptance Testing (UAT) is an important process necessary to draft the tool and engage with stakeholders on its refinement.

#### *Development and Inclusion of Disclosure and User Acknowledgment Language*

To emphasize to users that the SoCal Greenprint is a non-regulatory tool with no legal effect on land-use decisions made by local agencies or property owners, some stakeholders requested that SCAG include disclosure language in the tool. The final, publicly available version of the tool will include a pop-up screen displaying disclosure language. Prior to using the tool, users will be required to click an "I understand/acknowledge" box.

#### **Recommendation**

To ensure these activities can be completed, staff is recommending that Regional Council remove the pause on Greenprint implementation. Staff will then return to the Regional Council and Energy & Environment Committee once prospective user testing is complete to demonstrate the tool and seek feedback prior to public launch. Thereafter, regular updates will be provided to the Energy and Environment Committee.

**FISCAL IMPACT:**

This project is funded in SCAG's Fiscal Year 2021-2022 Overall Work Program under 290-4862.01 and 290-4862.02.

**ATTACHMENT(S):**

1. ATTACHMENT A - SoCal Greenprint Background and Analysis Report
2. ATTACHMENT B - Written Comments from the August 24, 2021 Public Hearing
3. ATTACHMENT C - SoCal Greenprint Proposed Data Layer List
4. ATTACHMENT D - Proposed Data Layers Survey Results
5. ATTACHMENT E - Datasets removed prior to posting of Proposed Data Layer List
6. ATTACHMENT F - Correspondence from Margaret Sohagi, Esq regarding CEQA
7. ATTACHMENT G - SoCal Greenprint Data Vetting Process
8. PowerPoint Presentation - SoCal Greenprint Hearing

## ATTACHMENT A

### SoCal Greenprint Background and Analysis Report Related to July 1, 2021 Board Directive

#### Report Contents:

1. **REGIONAL POLICY FOUNDATION**
  - 1a. Connect SoCal and the Sustainable Communities Strategy (SCS)
  - 1b. Natural and Farm Lands Conservation and Climate Resolution 21-628-1
  - 1c. Connect SoCal's PEIR
2. **SO CAL GREENPRINT PURPOSE AND SCOPE**
3. **STAKEHOLDER OUTREACH PRIOR TO JULY 2021**
4. **REGIONAL COUNCIL ACTION RECAP AND SUBSEQUENT ACTIVITIES**
  - 4a. Proposed Data Layer List and Survey
  - 4b. August 24th Public Hearing
  - 4c. Stakeholder Meetings
5. **SCAG RESPONSE TO COMMENTS**
  - 5a. Is the SoCal Greenprint a plan that will dictate local land use decisions?
  - 5b. Will local jurisdictions need to align data used in general plans and environmental assessments with the SoCal Greenprint?
  - 5c. 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.
  - 5d. Why are non-governmental data layers generated by non-governmental organizations and universities included? Are layers from these non-governmental institutions vetted?
  - 5e. Will SoCal Greenprint be used or referenced by SCAG as part of the Intergovernmental Review Program (IGR)?
  - 5f. Are locally-approved General Plans included in the SoCal Greenprint?
  - 5g. How will datasets be used in the tool?
  - 5h. Planned High Quality Transit Areas (HQTAs) for year 2045 should be removed and the 2016 base year data should be utilized in its place.
  - 5i. Links to datasets are not working on the proposed data list that was posted online.
  - 5j. Is this project being rushed? What is the project schedule and delivery timeline?
  - 5k. Why was The Nature Conservancy Chosen as a Consultant for this Project? Since they purchase and manage conservation easements, is there a conflict of interest?
  - 5l. What are the SoCal Greenprint related Connect SoCal PEIR Mitigation Measures and what are SCAG's required actions?
  - 5m. Pertinence of California Environmental Quality Act (CEQA)
  - 5n. Data Vetting Criteria
  - 5o. Data Citation Requirements
6. **PROPOSED NEXT STEPS TO ADDRESS STAKEHOLDER CONCERNS**
  - 6a. Removal and/or replacement of certain data layers
  - 6b. Consultation with SCAG's Technical Working Group
  - 6c. Advisory Committee Meeting for final Data Layer List Review
  - 6d. User Acceptance Testing
  - 6e. Development and Inclusion of Disclosure language
  - 6f. Regular updates to SCAG Energy and Environment Committee
  - 6g. Staff Recommended Action

*Note: This Background and Analysis Report refers to, and incorporates, Attachments B, C, D, E, F and G as included in the associated Regional Council staff report prepared for October 7, 2021. This report is a part of and incorporated into the staff report by this reference.*

## 1. REGIONAL POLICY FOUNDATION

### 1a. Connect SoCal and the Sustainable Communities Strategy (SCS)

Development and deployment of the SoCal Greenprint tool is part of SCAG’s comprehensive efforts to provide cities, counties and transportation agencies with the best available scientific information and tools needed to implement the vision outlined in Connect SoCal, namely to advance the region’s economic vitality, improve mobility options, and grow in a sustainable way that builds healthy and vibrant communities. The tool is intended to advance Connect SoCal’s specified goal to “promote conservation of natural and agricultural lands and restoration of habitats.”<sup>1</sup> It also is meant to balance Connect SoCal’s housing production strategies with the conservation of natural and agricultural lands as well as the restoration of habitats, and support strategies to preserve existing affordable housing and avert displacement.<sup>2</sup>

Connect SoCal includes specific strategies to support implementing the region’s adopted Sustainable Communities Strategy (SCS). Several strategies are directly tied to supporting related greenhouse gas (GHG) reductions while others support the broader plan goals. The SoCal Greenprint tool can provide important information to help implement several “Green Region” SCS strategies including:

- Support development of local climate adaptation and hazard mitigation plans, as well as project implementation that improves community resiliency to climate change and natural hazards;
- Support local policies for renewable energy production, reduction of urban heat islands and carbon sequestration;
- Integrate local food production into the regional landscape;
- Promote more resource efficient development focused on conservation, recycling and reclamation;
- Preserve, enhance and restore regional wildlife connectivity;
- Reduce consumption of resource areas, including agricultural land; and
- Identify ways to improve access to public park space.<sup>3</sup>

### 1b. Natural and Farm Lands Conservation and Climate Resolution 21-628-1

Connect SoCal includes a Natural and Farm Lands Conservation Technical Report that outlines an integrated land use and conservation planning approach that seeks to protect the environment and reduce GHG emissions while meeting the needs of current and future populations. Specific next steps are included to support further development of a regional conservation strategy, including the development of a regional greenprint to provide “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.”<sup>4</sup> Moreover, Resolution 21-628-1, which was adopted unanimously by the Regional Council on January 7, 2021, affirmed a climate emergency in the SCAG region

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<sup>1</sup> Connect SoCal p. 9

<sup>2</sup> Connect SoCal p. 153

<sup>3</sup> Connect SoCal p. 50

<sup>4</sup> Connect SoCal Natural and Farm Lands Conservation Technical Report p. 22

and emphasized the SoCal Greenprint as a tool to highlight the benefits of natural lands, waters and agricultural lands, including access to parks and trails, habitat protection and connectivity, food production and increased resilience to climate change.

### 1c. Connect SoCal's PEIR

Development of the SoCal Greenprint fulfills required mitigation measures of Connect SoCal's Program Environmental Impact Report (PEIR), which state that SCAG shall develop and use the Greenprint to identify priority conservation areas in support of advanced mitigation efforts in the region (SMM AG-2) and that new regional tools like the Greenprint will provide an easily accessible resource to help municipalities, conservation groups, developers and researchers prioritize lands for conservation based on the best available scientific data (SMM BIO-2). Please refer to section 5I for additional information and language reflected in these measures. Importantly, this mitigation measure applies only to SCAG, and nothing in the PEIR supersedes existing regulations and policies of individual jurisdictions. Since SCAG has no authority to impose mitigation measures on other jurisdictions, mitigation measures to be implemented by local jurisdictions in their own processing of projects are subject to a lead agency's independent discretion as to whether measures are applicable to projects in their respective jurisdictions. Lead agencies are under no obligation, legal or otherwise, to use measures identified in the PEIR. The determination of significance and identification of appropriate mitigation under the California Environmental Quality Act (CEQA) is solely the responsibility of the lead agency.

## 2. SOCAL GREENPRINT PURPOSE AND SCOPE

The SoCal Greenprint will be an optional, flexible, and open regional conservation-focused data tool for the six counties in the SCAG region. It will allow users to convert more than 100 existing data sources into interactive maps and summary reports, making it easier to understand how to integrate nature into future planning and development at a user's discretion. The SoCal Greenprint tool itself will not be a policy document, report, plan, or manual and has not regulatory effect on any jurisdiction. Examples of the data that will be available to inform interactive maps and summary reports generated by user-derived priorities include locations of groundwater sources, wildlife corridors, areas at risk of experiencing wildfires, and places that will experience extreme temperatures threatening public health. Each map and summary report will include a thorough explanation of what the data is conveying, how the data was generated, data sourcing, and context for how the information may be used to integrate nature into project planning. For example, a data layer that highlights where groundwater sources are located can offer guidance for best management practices and designs that protect and reduce impacts to groundwater. Suggestions can be included on how to plan and mitigate for the impacts of climate change in support of Resolution # 21-628-1 adopted by the Regional Council on January 7, 2021.

The tool was built with five user groups in mind who are shaping the future of the region: developers, planners, infrastructure agencies, community-based organizations and conservation professionals. One of the project goals is to make it simpler for intended users to easily access information about natural resources so that planning and mitigation measures can be identified early in project development, thereby reducing overall project costs, expediting project-delivery, and making it possible to proactively address issues to help avoid potential litigation.

In 2019 SCAG contracted with The Nature Conservancy (TNC) to assist in developing the SoCal Greenprint. TNC has extensive experience and expertise in developing Greenprints in California that serve as easy-to-use resources to promote conservation and smart growth.

Overall, the SoCal Greenprint will be an important tool to identify environmental challenges and opportunities early in the planning process to help expedite and reduce risks to infrastructure project delivery and build healthy communities. It is important to understand the limitations of the tool and recognize that it is not a plan for future development.

A GREENPRINT IS	A GREENPRINT IS NOT
A data tool that can help to advance the pace and scale of voluntary conservation in a region.	A regulatory plan or acquisition map that puts constraints on land use for any public or private entity.
A data tool that identifies landscape features that are important to residents and communities, like recreation, habitat, water resources, habitat, climate change resiliency or community.	A required tool for use in project-level mitigation
A data tool that illustrates how conservation values may work in concert with each other and with other values, like climate resilience.	A complete inventory of everything important within an area or new data set, nor a comprehensive solution for natural resource protection.
A resource that helps stakeholders understand factors in a specific area to help facilitate collaboration.	A requirement that stakeholders engage in projects.
An information tool to support data-driven decision making for infrastructure investments.	An effort to subvert private property rights.

### 3. STAKEHOLDER OUTREACH PRIOR TO JULY 2021

Development of the SoCal Greenprint launched in 2020 and has featured several rounds of feedback and input from a diverse group of stakeholders in the fields of planning, land development, transportation, infrastructure, conservation, and community services organizations. The project’s first year entailed extensive, targeted outreach to stakeholders to gain insight on the tool’s potential key stakeholders, uses, main themes, and the most useful datasets to include. More than 60 organizations, representing every county in the SCAG region, have participated in the development process. Eighteen science advisors from regional universities, conservation entities, and museums have also provided guidance to ensure that the best available scientific data is utilized in the tool.

Additional information on project stakeholders, outreach, and how feedback informed the data vetting process for the selection of proposed layers for inclusion in the tool is included in **ATTACHMENT G**.

### 4. REGIONAL COUNCIL ACTION RECAP AND SUBSEQUENT ACTIVITIES

On July 1st, 2021 the Regional Council voted to pause implementation on the SoCal Greenprint for at least 30 days and to hold a public hearing at a future date for further discussion, permitting staff to engage in further outreach with stakeholders.

An initial hearing to solicit feedback from stakeholders was conducted on August 24, 2021. A recording of the meeting can be found on [SCAG’s website](#), and written comments received prior to the August 24<sup>th</sup>

meeting can be found in **ATTACHMENT B**. A noticed public hearing is also scheduled during the Regional Council's October 7, 2021 regularly scheduled meeting.

In adherence to the Regional Council's direction, SCAG staff and TNC continue to engage stakeholders and have solicited feedback on the tool as well as the proposed datasets for inclusion in multiple formats – principally, through a stakeholder survey on the proposed data layer list, a public hearing on the tool, and one-on-one meetings with various stakeholder groups expressing concern and/or support for implementation of the tool.

#### 4a. Proposed Data Layer List and Survey

On July 19, the SoCal Greenprint's Proposed Data Layer List (**ATTACHMENT C**) list was posted online, and stakeholders were invited to provide feedback on specific data layers through a survey. This data listing currently provides background information on the proposed individual data layers that draw from diverse sources, including public agencies, universities, non-profit organizations, amongst others. Data is divided into six themes: Agricultural & Working Lands; Built Environment; Vulnerabilities & Resilience; Environmental Justice, Equity & Inclusion; Habitat & Biodiversity; and Water Resources.

SCAG staff was made aware of certain inoperable links to data on the Proposed Data Layer List. Staff determined that this was due to a technical error in converting the original Excel file into Portable Document Format (.pdf). All links were fully repaired and reposted by September 14, 2021.

The six themes and datasets were developed with robust stakeholder engagement throughout 2020 and during the first half of 2021 to ensure that the tool is crafted to address the information needs of developers, local planners, infrastructure agencies, community-based organizations, and conservation professionals. The SoCal Greenprint team has conducted regular engagements with over 60 advisors from these key user groups and other stakeholders through meetings with the project's Steering, Advisory, and Scientific committees, and have also completed interviews with 35 partners. Further, "Rapid Assessment" sessions have been conducted with a diverse array of organizations to identify their priorities and walk individual stakeholders through potential data outputs for inclusion in the SoCal Greenprint.

A survey was conducted to continue engagement with stakeholders and solicit additional feedback on individual data layers proposed to be included in the SoCal Greenprint. The survey builds on the project's continuous engagement process and was developed in response to the July 1, 2021 motion by SCAG's Regional Council to pause the implementation of the SoCal Greenprint and engage with stakeholders to consider and address concerns.

The survey was distributed widely and made publicly available between July 19 and August 13, 2021. SCAG sent the survey to more than 4,200 people, including all SoCal Greenprint advisors, city managers, clerks, council members, mayors, planning directors, planning staff, public works directors, representatives from the building industry, business councils, chambers of commerce, and others. The survey was also published on SCAG's website for any stakeholder or member of the public to access. Results of the survey show that:

- Thirty-three respondents submitted the survey. Users could comment on one or more layers, with 69 survey comments addressing 45 different data layers;
- Feedback on the data layers was generally positive: 75% of comments were supportive of the data layer(s), 13% offered suggestions to improve data layer(s) or consider additional data, 3%

expressed a concern over the data layer(s), and no comments through the survey requested exclusion of specific data layer(s). Letters provided in lieu of the survey before the deadline identified less than five data layers with potential issues;

- When asked for feedback on concerns about the goal of the SoCal Greenprint, 53% of respondents reported no concerns about the goal and no respondents reported concerns. However, 12% of respondents expressed concerns over pausing or not completing the project and 18% of respondents expressed other concerns; and,
- When asked for feedback on general concerns about the SoCal Greenprint, 47% of respondents expressed concern over pausing or not completing the project, 27% expressed concern over the data content, 13% expressed other concern, and 13% expressed no concern.

Some stakeholders opted to provide written feedback on data layers independent of the survey. These letters requested that data and layers generated by universities and non-profit entities be removed from the tool. A request was also made for the tool's function to be narrowed so that it would apply only to lands designated for open space or agricultural uses in local general plans, and exclude lands where transportation projects have been included in Connect SoCal. SCAG's response to these concerns are included in section #5, SCAG RESPONSE TO COMMENTS.

#### 4b. August 24th Public Hearing

SCAG held the first of two planned public hearings on August 24th, 2021 from 4pm to 6pm. After a presentation on the SoCal Greenprint from SCAG Staff, stakeholders had the opportunity to provide verbal comments. Written comments were also accepted from July 28th through the close of the hearing. A recording of the hearing can be found on the SCAG website, and written comments can be found in **ATTACHMENT B**.

A total of 34 speakers participated in the public hearing. An equal number of comments expressed support for the project to those who expressed concerns. Specifically:

- 41% expressed support;
- 41% expressed concerns;
- 9% expressed support and concerns; and
- 9% had general feedback or questions

Additionally, a total of 39 comment letters were received. Of the 39 letters, there were 35 unique respondents/letters. A significant majority of the comment letters received were supportive of the project.

- Of the 35 letters, 74% of letters were supportive and 26% expressed concerns;
- Most letters did not address specific data layers and provided more general comments and/or concerns; and
- Of the 35 letters, 17% of letters addressed specific data layers and 2 letters requested including additional data layers.

Common general concerns included:

- Broken or inaccessible links to background information on the data layers, which were subsequently repaired and reposted by SCAG on September 14, 2021;
- Inclusion of non-governmental data sets;
- Data credibility and transparency;

- Process challenges such as CEQA litigation;
- Perceived conflicts with other regional development goals; and,
- Exclusion or inclusion of certain data.

Common general comments included: support for the inclusion of an equity section and data; reiteration of the SoCal Greenprint’s goals and expectations; expected housing and transportation service needs; support to advance sustainable development and conservation amid environmental challenges (e.g., climate change); and the importance of including data on essential infrastructure, natural resources, and climate change impacts.

#### 4c. Stakeholder Meetings

SCAG staff made presentations on the SoCal Greenprint to the Technical Working Group (TWG) on July 15 and September 30, and hosted a special hour-long workshop for TWG members on July 29. At this workshop, participants were given an in-depth overview of the data and technical aspects of the tool and had an extended question and answer period with SCAG and TNC staff. SCAG staff also made a presentation on the SoCal Greenprint to the Global Land Use & Economic (GLUE) Council meeting on August 9, and included the topic on their October 4 meeting agenda. Members were invited to provide feedback.

SCAG staff and leadership have also been engaging in one-on-one meetings with stakeholders. On August 16, SCAG’s Board Officers and staff met with representatives from the building industry, with a follow-up meeting on September 13. Building industry representatives expressed concerns about moving forward the Greenprint without reevaluating several of its proposed data layers and expressed concern in having the tool include lands designated for open space or agricultural uses in local general plans, and exclude lands where transportation projects have been included in Connect SoCal. On August 18, SCAG’s Board Officers and staff met with representatives of environmental and architecture organizations, who emphasized the importance of removing the current pause on tool implementation and developing the Greenprint as identified in Connect SoCal and the PEIR.

TNC and SCAG staff have also met with stakeholders who responded to the survey to address any questions about the Proposed Data List and listen to comments and concerns about proposed data layers.

### 5. SCAG RESPONSE TO COMMENTS

Since the project kicked-off in January 2020, SCAG has received multiple letters expressing concerns or support for the SoCal Greenprint, in addition to verbal comments made during the Public Hearing on August 24<sup>th</sup>. The following is an overview of frequently cited concerns, with SCAG’s response:

#### 5a. Is the SoCal Greenprint a plan that will dictate local land use decisions?

The SoCal Greenprint will not be a policy document, plan, regulation, manual, or report. As with the region’s adopted 2020 Sustainable Communities Strategy (contained within the Connect SoCal plan), it will be non-regulatory, optional resource providing convenient access to multiple datasets that can help inform local land use decisions. The tool will provide access to existing data to inform interactive maps and summary reports generated by user-derived priorities. It will not be a regulatory document that is intended to limit or restrict land use decisions made by local jurisdictions. Consistent with the Connect SoCal PEIR mitigation measures referenced previously, the SoCal Greenprint is being developed as an optional GIS-based mapping tool that permits users at their own discretion to view and summarize data

related to agriculture and working lands, the built environment, vulnerabilities and resilience, environmental justice and equity, habitat and biodiversity, and water resources in a user-defined area. Nothing requires a local agency or governmental jurisdiction to use the SoCal Greenprint for land use planning.

### 5b. Will local jurisdictions need to align data used in general plans and environmental assessments with the SoCal Greenprint?

Foremost, local jurisdictions have land use authority and are therefore best equipped to make decisions on what data is utilized for local planning initiatives, including general plans and environmental assessments. The SoCal Greenprint tool is not a regulatory program or plan, and local jurisdictions have no obligation whatsoever to use or consult the SoCal Greenprint tool as part of their planning process. The SoCal Greenprint tool will make it easy for users to view a range of publicly available, existing data sets that may or may not be the same as those datasets used by local jurisdictions in their environmental assessments. Further, the SoCal Greenprint will be utilizing datasets that have regional coverage, and local jurisdictions may be better suited to identify datasets with more precision at smaller scales (e.g. parcel, neighborhood, and community levels). SCAG will convey to users that local jurisdictions are the authority on land use decisions and data selected for local planning in the tool through inclusion of disclosure language that users must acknowledge when using the tool (as discussed further in section 6e). The SoCal Greenprint tool returns data results based on user inputs, which will vary based on user interest. As a result, local jurisdictions may use data sets of their choosing when completing environmental assessments. Users will be able to turn map layers on and off in the web map portion of the tool to better understand the overlap of different environmental resources in their area of interest. As previously noted, the SoCal Greenprint tool will not be a policy document, plan, regulation, manual, or report that establishes a course of action for local agencies and other stakeholders. It will be a resource that aggregates data that is already open, existing, and public information into a mapping tool. If a selected area of interest is too small for certain data to support, the data will deprecate and not be reported. In such cases, the summary report will include language saying that the area of interest is below the tool's acreage thresholds.

### 5c. 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 has solicited input from a number of stakeholders on the Proposed Data Layer List and will continue to work with strategic advisors, scientific advisors, and members of the Technical Working Group. One layer that has been flagged as a concern from these stakeholders is the "Tree Equity Score" data produced by American Forests, which calculates a score for all 150,000 neighborhoods and 486 municipalities in urban America. Each score indicates whether there are enough trees for everyone to experience the health, economic and climate benefits that trees provide. The scores are based on how much tree canopy and surface temperature align with income, employment, race, age and health factors. SCAG will be examining this layer for inclusion based on feedback provided, and will be seeking guidance on its potential exclusion from strategic advisors, scientific advisors, and members of the Technical Working Group in fall 2021.

#### 5d. Why are non-governmental data layers generated by non-governmental organizations and universities included? Are layers from these non-governmental institutions vetted?

Consistent with the Connect SoCal PEIR mitigation measures, the SoCal Greenprint must utilize the best available scientific data. Best available science and data enables sound decisions based on current conditions, which is critical in a region that is continually changing. The majority of data sources used for the SoCal Greenprint are government sources. Other data sources include academic sources, many which are either peer reviewed, based on peer reviewed methods, or are used for official government purposes and thus have been vetted. Many datasets are the result of collaboration between government agencies, non-governmental organizations, and/or academic institutions. These datasets are often hosted by government agencies. Excluding non-governmental layers from the SoCal Greenprint would reduce the comprehensiveness of the tool and ignores general tenets of sound planning.

In several instances, non-governmental organizations were contracted by governmental agencies to develop datasets due to their expertise in a particular area of science and geographic information systems. Of the layers included in the Proposed Data Layer List, more than 80% are developed by government institutions. Nearly 10% of layers in the Proposed Data Layer List are funded by governmental agencies, but authored by non-governmental organizations. The remaining layers that are produced by non-profit organizations and universities.

In many instances, non-governmental institutions are better equipped to develop data layers due to their scientific expertise and/or ability to collaborate across political boundaries. One example is the South Coast Missing Linkages data, which was developed by the non-profit organization SC Wildlands in collaboration with National Park Service, U.S. Forest Service, California State Parks, The Wildlands Conservancy, The Resources Agency, California State Parks Foundation, The Nature Conservancy (TNC), Santa Monica Mountains Conservancy, Resources Legacy Foundation, Conservation Biology Institute, San Diego State University Field Stations Program, Environment Now, Mountain Lion Foundation, and the Zoological Society of San Diego's Conservation and Research for Endangered Species, among others. Cross-border alliances were also formed with Pronatura, Universidad Autonoma de Baja California, Terra Peninsular, and Conabio. This layer was used for modeling purposes by SCAG in Connect SoCal is widely used by local governments and other actors to support decision-making on strategic conservation investments, and builds from a highly collaborative inter-agency effort to identify and conserve the highest priority linkages in the South Coast Ecoregion. Origination of the data layer by a non-governmental organization helped facilitate this collaboration between public and private entities.

#### 5e. Will SoCal Greenprint be used or referenced by SCAG as part of the Intergovernmental Review Program (IGR)?

SCAG's Intergovernmental Review (IGR) Program is responsible for providing informational resources to regionally significant plans, projects, and programs per CEQA Guidelines Section 15206 to facilitate the consistency of these projects with SCAG's adopted regional plans, to be determined by the lead agencies. Informational resources include regional goals and policies, jurisdictional-level growth forecast and mitigation measures contained in the Program Environmental Impact Report. This process helps lead agencies to identify the project's impact on a regional scale and how the proposed project contributes to our region's plan and vision as SCAG is also the designated Regional Transportation Planning Agency under state law and is responsible for preparation of the Regional Transportation Plan (RTP) including the

Sustainable Communities Strategy (SCS) pursuant to Senate Bill (SB) 375. Informational resources such as SCAG’s Regional Transportation Plan/Sustainable Community Strategies (RTP/SCS) goals, strategies and mitigations measures referenced in SCAG’s comment letters during the Notice of Preparation (NOP) stage are provided as guidance for lead agencies for consideration during project development. Since the SoCal Greenprint is not an adopted plan, it will not be utilized for Intergovernmental Review.

#### 5f. Are locally-approved General Plans included in the SoCal Greenprint?

Every four years, SCAG engages one-on-one with the 197 local jurisdictions in the region to develop a regional snapshot of general plan land uses, specific plan land uses, zoning, and existing land uses at the parcel-level for all areas in the SCAG region. Importantly, these layers include both local general plan codes and regional general plan standardized codes, and were shared with local jurisdictions for review and refinement in 2017 and 2018. These datasets are included for each county in the Proposed Data Layer List as items number 52 to 57, as described:

*“This is SCAG’s 2016 land use dataset developed for the Final Connect SoCal, the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), including general plan land use, specific plan land use, zoning code and existing land use.”*

#### 5g. How will datasets be used in the tool?

Each dataset will be used in the same way on the SoCal Greenprint platform, to view data by one of several methods: (1) webmaps with individual/combined layers, (2) multi-benefit asset maps that combine data layers by theme, and (3) summary reports that explain data outputs for a user-generated area with more detail on each feature as follows:

1. An interactive **webmap function will allow users to view any individual data layer on its own, or a combination of layers**. Users turn on and turn off layers, or can adjust transparency based on what’s important to them. These layers are already publicly available and downloadable from existing resources, either online or via request to the author or custodian of the data. The map merely permits users to aggregate these available data sets in a customizable and easy to use fashion. Layers will be shown in their native versions, and will not be altered;
2. **Multi-benefit asset maps** combine data layers along a common theme, and are used for visualization purposes. The application of this data is flexible and priorities are user driven, as users can toggle transparencies to see how benefits within that data theme vary by area based on what’s important to them. This enables users to view data based on their unique needs and perspectives; and
3. Users can access **summary reports** for an area by drawing boundaries in the application or adding a shapefile with boundaries. The tool will **generate reports summarizing underlying data elements** in the area, and users can compare two areas side-by-side if desired. Summary reports and the underlying data will be available for download.

Beyond sorting data sets into relevant themes (Agriculture & Working Lands, Biodiversity & Habitat, Built Environment, Environmental Justice, Equity and Inclusion, Vulnerabilities and Ecological Resilience, and Water Resources), there is no separate or special use for individual datasets and the “use” of the data to populate the maps or summary reports will be based on users’ selections.

5h. Planned High Quality Transit Areas (HQTAs) for year 2045 should be removed and the 2016 base year data should be utilized in its place.

SCAG will take this feedback and consider excluding planned HQTAs, with consultation from the Strategic and Scientific Advisors for the SoCal Greenprint as well as SCAG’s Technical Working Group (TWG).

5i. Links to datasets are not working on the proposed data list that was posted online.

There were a handful of hyperlinks that were not working due to a technical error in converting the original Excel file into Portable Document Format (.pdf). The majority of the inoperable links were replaced with working ones on September 9, 2021. A few more were spotted subsequently, and the remainder were resolved on September 14, 2021.

5j. Is this project being rushed? What is the project schedule and delivery timeline?

Developing the SoCal Greenprint is a multi-year process and has included numerous opportunities for public input and involvement. The contract with TNC was approved at a public meeting of SCAG’s Regional Council in June 2019 and the project kicked off in January 2020, with a planned launch of the tool during the first half of 2022, reflecting a more than two-year development process.

The Greenprint was included as a project feature and mitigation measure of the Connect SoCal plan, which was approved following numerous meetings and opportunities for stakeholder input. Since engaging in the project, SCAG has delivered multiple presentations and reports to policymakers and working group members including the Regional Council; Energy and Environment Committee; Community, Economic and Human Development Committee; Emerging Technologies Committee; Natural and Farm Lands Conservation Working Group; Technical Working Group; and the Global Land Use and Economic (GLUE) Council. Additionally, SCAG has continued the pause on project implementation for over 70 days to get more stakeholder feedback, well past the minimum 30 days. Timely completion and launch of the SoCal Greenprint is important to align with implementation of mitigation measures contained in the 2020 Connect SoCal PEIR and sufficiently in advance of the 2024 Connect SoCal Plan.

5k. Why was The Nature Conservancy Chosen as a Consultant for this Project?

The TNC has extensive experience and expertise in developing Greenprints in California that serve as easy-to-use resources to promote conservation. TNC is the only entity to have developed a large-scale regional web-based Greenprint tool specifically for use by local and transportation agencies. As a non-profit public charity, TNC’s actions are designed to benefit the public.

5l. What are the SoCal Greenprint related Connect SoCal PEIR Mitigation Measures and what are SCAG’s required actions?

As a mitigation measure for the Connect SoCal plan, the SoCal Greenprint will provide the best available scientific data to help local jurisdictions and transportation agencies make better land use and transportation infrastructure decisions that can support conservation of natural and farm lands. Further, the SoCal Greenprint will help SCAG, municipalities, conservation groups, and developers to prioritize lands for future conservation to support advanced mitigation in established and forthcoming transportation measures as well as the development of advanced mitigation programs.

Regarding the comment that the SoCal Greenprint should apply only where the respective local jurisdiction has identified areas as permanent open space/agricultural land, and should exclude lands where transportation projects have been included in Connect SoCal, it is important to understand the precise language of the PEIR, and its call for advanced mitigation. The specific PEIR mitigation measures referencing the need to establish the SoCal Greenprint are included here:

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

*SMM BIO-2: SCAG shall continue to develop a regional conservation strategy in coordination with local jurisdictions and other stakeholders, including the county transportation commissions. The conservation strategy will build upon existing efforts including those at the sub-regional and local levels to identify potential priority conservation areas. SCAG will also collaborate with stakeholders to establish a new Regional Advanced Mitigation Program (RAMP) initiative to preserve habitat. The RAMP would establish and/or supplement regional conservation and mitigation banks and/or other approaches to offset impacts of transportation and other development projects. To assist in defining the RAMP, SCAG shall lead a multi-year effort to SCAG shall develop new regional tools, like the Regional Data Platform and Regional Greenprint that will provide an easily accessible resource to help municipalities, conservation groups, developers and researchers prioritize lands for conservation based on best available scientific data. The Regional Greenprint effort shall also produce a whitepaper on the RAMP initiative, which includes approaches for the RAMP in the SCAG region, needed science and analysis, models, challenges and opportunities and recommendations.*

Advanced mitigation is a “science-based approach to identify mitigation opportunities to support regional conservation priorities. By considering mitigation development early in the planning process prior to design and permitting phases, proponents can identify higher-quality mitigation opportunities”<sup>5</sup> Identifying mitigation opportunities early in the planning stages can reduce costs for projects, and can also reduce uncertainty in the CEQA process. Advanced mitigation involves identifying areas that are rich in habitat value that are not presently preserved for conservation. In supporting the future conservation of these lands elsewhere in the region, environmental impacts from a project in an immediate vicinity can be mitigated. In pursuing advanced mitigation, local stakeholders should use the best available scientific information to identify areas that are valuable for habitat value but are not presently conserved.

Limiting the utility of the SoCal Greenprint tool and/or narrowing its data accessibility or applicability to only select areas within the region (e.g. lands designated for open space or agricultural uses in local general plans, or excluding lands that cover Connect SoCal transportation projects) would effectively negate its utility for advanced mitigation purposes. Regional advanced mitigation opportunities would be hamstrung since users would not be able to identify areas apt for conservation using the tool – especially areas that would be in close proximity to transportation projects. Since the SoCal Greenprint could

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<sup>5</sup> California Department of Fish and Wildlife

connect stakeholders across political boundaries, it can also be a strong tool to identify areas apt for conservation in one county when a project falls in another.

### 5m. Pertinence of California Environmental Quality Act (CEQA)

Concerns have been raised about how the use of the SoCal Greenprint’s data sets and tool may impact a project’s CEQA analysis. Please see the attached correspondence from Margaret Sohagi, Esq., the principal of The Sohagi Law Group, who has been retained to render an opinion on this matter (**ATTACHMENT F**).

### 5n. Data Vetting Criteria

After many rounds of consultation with the SoCal Greenprint Scientific and Strategic Advisors, as well as other stakeholders, data will be selected for potential inclusion by SCAG staff through ongoing consultation with stakeholders and the consultant team and must meet all the following criteria:

- Data must be publicly available, meaning that existing datasets are available online or can be accessed if requested and/or licensed;
- Data was vetted for inclusion by the SoCal Greenprint Scientific Advisors; and
- Data would support decision-making from the five key user groups identified through the planning process (planners, infrastructure agencies, developers, community-based organizations, and conservation organizations) based on suggestions and feedback from Science and Strategic Advisors.

Importantly, stakeholder engagement helped match user needs with data availability. For example, developers and builders indicated that it would be useful to understand where existing infrastructure such as utility lines are located to make it easier to understand where it would be more efficient and affordable to build new development. Other data additions made by stakeholder input include data from CalEnviroScreen that helps local leaders understand the relationship between socioeconomic factors and environmental hazards. For additional information on the SoCal Greenprint’s data vetting process, please refer to **ATTACHMENT G**.

### 5o. Data Citation Requirements

The SoCal Greenprint will include an extensive glossary that cites the data sources, explains the data, and offers guidance on how the information can be used.

Consistent with SCAG’s past and current practice, all data layers included in the SoCal Greenprint will feature individual background information on methods, limitations, sourcing, as well as guidance on their proper use, including:

- A narrative glossary definition explaining what the measure is in user-friendly terms;
- A description of the methodology used to include the data. If any more complex formulas were used, those will be detailed;
- Names, URLs, and last-updated date for data source(s). Usually a single source, but in rare instances one measure might draw on two data sources. In all cases, URLs will link back to the original source of the data; and
- Minimum reporting size. Where data is accurate at larger areas but not smaller, we will display the minimum reporting size alongside the glossary entry. (Note that this reporting threshold will

be used in the tool to hide reporting for measures that are not precise enough for a given area of interest report).

Further, layers will be combined in a single database for external use through an Automated Programming Interface (API), and the database will include metadata consistent with the Geospatial Metadata Standards and Guidelines established by the Federal Geographic Data Committee (FGDC), as such:

- Identification Information (originator, publication date, title, abstract, purpose, time period for content, currentness, progress, maintenance, etc.);
- Data Quality Information (attribute accuracy, completeness, positional accuracy, etc.);
- Spatial Data Organization Information (indirect spatial reference for locating data without using coordinates);
- Spatial Reference Information (geographic coordinate system, latitude and longitude, etc.);
- Entity and Attribute Information (detailed description of dataset, overview description, attribute domain values, etc.);
- Distribution Information (contact information for the individual or organization that distributes the data, a statement of liability assumed by the distributing individual or organization); and
- Metadata Reference Information (date metadata was written, contact information for the metadata author, metadata standard, metadata access constraints, metadata use constraints).

## 6. PROPOSED NEXT STEPS TO ADDRESS STAKEHOLDER CONCERNS

SCAG recommends the following steps and actions in order to address stakeholder concerns:

### 6a. Removal and/or replacement of data layers

As previously noted, the complete list of proposed data layers has been made publicly available and SCAG collected feedback via survey on the inclusion of individual layers (**ATTACHMENT C & D**). The Proposed Data Layer List is not final, and SCAG staff is actively evaluating stakeholder comments and concerns about specific data sets. SCAG will consider removal or replacement of data layers with alternative datasets based on the recommendations and concerns raised by stakeholders. Ultimately, SCAG staff, in consultation with the SoCal Greenprint's Scientific and Strategic Advisory Committees, will determine which proposed data layers will be available in the Greenprint tool.

After hearing concerns from stakeholders and applying data vetting criteria, SCAG staff have decided to remove the Antelope Valley Regional Conservation Investment Strategy (AVRCIS) Cores and Linkages dataset from consideration for the final list of data layers. This decision was made since the AVRCIS has not received approval from the California Department of Fish and Wildlife.

It is important to emphasize that over 50 data sets were removed from consideration prior to the release of the Proposed Data Layer List for a number of reasons, including but not limited to:

- Datasets did not meet the criteria listed above;
- Advisors noted concerns about limitations or incompleteness of the data; and
- Data elements could be replaced with a similar, but superior dataset

The full list of data sets removed from consideration for the Proposed Data Layer list can be found in **ATTACHMENT E**.

### 6b. Consultation with SCAG’s Technical Working Group

After revising the Proposed Data Layer List according to stakeholder feedback, SCAG staff will present the revised list to the Technical Working Group (TWG) for further consultation on revisions to data layers for inclusion in the tool. The Charter for the Technical Working Group can be found on SCAG’s webpage at <https://scag.ca.gov/technical-working-group>.

### 6c. Advisory Committee Meeting for final Data Layer List Review

After receiving feedback from the TWG, SCAG will make recommendations for layer adjustments and subsequently seek feedback from project stakeholders and Scientific Advisors at an open project Advisory Committee meeting. From there, SCAG staff will determine the final list of data layers to include in the SoCal Greenprint.

### 6d. User Acceptance Testing

Should the pause be lifted, SCAG will conduct User Acceptance Testing (UAT), specifically live application beta testing, where at least 10 targeted stakeholders will test a draft version of the tool to identify any issues with functionality before it is completed and publicly launched. Included in the SoCal Greenprint’s Scope of Work, User Acceptance Testing (UAT) is an important process necessary to draft the tool and engage with stakeholders on its refinement.

### 6e. Development and Inclusion of Disclosure and User Acknowledgment Language

To emphasize to users that the SoCal Greenprint is a non-regulatory tool with no bearing on land-use decisions made by local agencies or property owners, stakeholders requested that SCAG include disclosure language in the tool. The final, publicly available version of the tool will include a pop-up screen displaying disclosure language. Prior to using the tool, users will be required to click an “I understand/acknowledge” box.

### 6f. Regular updates to SCAG Energy and Environment Committee

Should the pause be lifted, during the development process and after its release, SCAG staff will provide quarterly updates to the Energy and Environment Committee.

### 6g. Staff Recommended Action

To ensure these activities can be completed, staff is recommending that Regional Council remove the pause on Greenprint implementation as directed on July 1, 2021, and direct staff to:

1. *Proceed with developing the SoCal Greenprint as identified in Connect SoCal and its associated Program Environmental Impact Report (PEIR);*
2. *Include features in the SoCal Greenprint to convey limitations and foster its proper use, such as a disclosure statement and mandatory user acknowledgement feature;*
3. *Conduct an open advisory meeting for further review and revision of data layers;*

4. *Remove datasets for inclusion in the tool if they are not publicly available (i.e. layers are accessible for download online, or are downloadable via request and/or license to the author or custodian of the data);*
5. *Complete prospective user testing with at least ten stakeholders representing the diverse array of potential users to ensure that the tool is working and functional as developed with targeted audiences;*
6. *Engage in continued public outreach as described at the July 1, 2021 RC meeting; and*
7. *Return to the Regional Council and Energy & Environment Committee once prospective user testing is complete to demonstrate the tool and seek feedback prior to public launch.*

**Attachment B**

**Written Comments from the August 24, 2021 Public Hearing**

List of Organizations that Submitted Comment Letters
Active SGV
American Institute of Architects
Belinda Faustinos, Nature for All
Bowman Change, Inc.
Building Industry Association of Southern California
California Department of Transportation (Caltrans)
California League of Conservation Voters
Center for Demographic Research
Central Coast Alliance United for a Sustainable Economy
City of Mission Viejo
Coalition A (Climate Resolve, Endangered Habitats League, California YIMBY, Everyone In, Natural Resources Defence Council, Abundant Housing LA, Center for Biological Diversity, The Climate Reality Project Los Angeles Chapter, League of Women Voters of Los Angeles County)
Coalition B (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)
Coalition C (Southern California Leadership Council, Los Angeles County Business Federation (BizFed), Orange County Business Council, Inland Empire Economic Partnership, Los Angeles Area Chamber of Commerce, Rebuild SoCal Partnership, Engineering Contractors’ Association Southern California, Contractors Association, San Gabriel Valley Economic Partnership, Santa Clarita Valley Chamber of Commerce, Hispanic 100, Long Beach Area Chamber of Commerce, Torrance Area Chamber of Commerce, Southern Orange County Economic Coalition, Ventura County Coalition of Labor, Agriculture and Business (CoLAB), Construction Industry Air Quality Coalition / Construction Industry Coalition on Water Quality, NAIOP SoCAL Chapter, North Orange County Chamber of Commerce)

Attachment: ATTACHMENT B - Written Comments from the August 24, 2021 Public Hearing (SoCal Greenprint Update)

Coalition for Clean Air
Communities for a Better Environment
Construction Industry Air Quality Coalition
Council of Mexican Federations
Diamond Bar - Pomona Valley Sierra Club, Angeles Chapter
Endangered Habitats League
Friends of Harbors, Beaches, and Parks
Inland Empire Resource Conservation District
LA Conservation Corps
Los Angeles Alliance for a New Economy
Maria del Carmen Lamadrid
Mojave Desert Land Trust
Orange County Transportation Authority
Orange County Business Council
Peoples Collective for Environmental Justice
Pitzer College - Robert Redford Conservancy
Puvungna Wetlands Protectors; Sierra Club's Los Cerritos Wetlands Task Force
Santa Clara Valley Transportation Authority
Stephanie Pincetl, UCLA Institute of the Environment and Sustainability
Tejon Ranch Company
US Green Building Council Los Angeles
Warehouse Workers Resource Center

August 19, 2021

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

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Chris Tran

**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

---

**From:** Will Wright [REDACTED]  
**Sent:** Tuesday, August 24, 2021 2:04 PM  
**To:** SCAG Green Region  
**Subject:** Support for SoCal Greenprint Initiative

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

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

[REDACTED]  
[www.aialosangeles.org](http://www.aialosangeles.org)

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August 19, 2021

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

Re: SoCal Greenprint

Dear SCAG President Lorimore,

I have been honored to serve on the SoCal Greenprint Advisory Committee and applaud the efforts of SCAG in undertaking this effort which will substantively benefit regional planning for all stakeholders. The advisory committee represents a broad range of interest groups who have been actively engaged in providing input on development of this GIS tool.

Therefore I am deeply concerned about the July 1 discussion about the future of the SoCal Greenprint, I urge the SCAG Regional Council to keep the project on track and ensure that the free, interactive, easy-to-use resource is completed in time to make it possible to plan for the sustainable growth needed to build a healthy and vibrant Southern California.

The SCAG Regional Council's efforts to ensure that there is rigorous debate and substantive public input for the launch of the informational resource tool welcomed, clearly this needs to be a transparent process. However, it is essential that the plan move forward in order to make more than 100 publicly available data sources available via interactive maps to make it easier to integrate nature into the future growth and development of the region.

The data layers chosen were selected based on feedback provided on what information is essential to the five primary stakeholders that will be building the future of the region: developers, planners, government agencies, community organizations and conservation professionals. Data such as the location of essential infrastructure like sewage lines, where wildfires have historically occurred, groundwater sources and where tree canopies are located are among the maps that will make it clear what the most efficient locations are for building new housing, what natural resources need to be protected and the climate change impacts that need to be considered to build resilient communities.

Access to information will make it easier to build the housing needs required to sustain an economically dynamic region, and that is what the SoCal Greenprint offers. It does not establish new rules, create new regulations or alter existing data, as some opponents have claimed. It was built by experts on environmental stewardship and data, with transparent input from a diverse number of stakeholders, including the building industry, to make it a free, useful and optional resource to protect the environmental assets of the region.

I enthusiastically support the project and agree that it is important to listen to other stakeholders who may have additional feedback to strengthen the usefulness of the tool. However, I hope that the Aug. 24 public hearing and subsequent action serve as a way to improve the tool and process and not derail it. At a time when the threats of climate change – including drought, wildfire, environmental degradation and air quality – are clearer than ever, now is not the time to ignore the information that will empower us to make smarter decisions.

Thank you,



Belinda Faustinos  
Retired Executive Director  
Nature for All

August 20, 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 local business, we are reaching out 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.

There is no question that Southern California as a region will continue to expand and develop in the years to come. Southern California needs additional housing and transportation services to help it continue to be an economically vibrant region. Bowman Change, Inc. is a supporter of the SoCal Greenprint because it elevates existing data to help decision makers and stakeholders like ourselves understand how to best integrate nature into the future growth and development of the region.

The SoCal Greenprint is a tool that is in line with SCAG and the region's leadership in ensuring that our continued growth is done so in a sustainable way that prepares our communities for the climate challenges that lie ahead. As a region, Southern California is connected by watersheds, wildlife corridors, air quality issues and economic activity that is not constrained by jurisdictional boundaries. The SoCal Greenprint will help our organization and others overcome those boundaries to promote smart regional planning that also makes sense locally. We appreciate the opportunity to leverage the SoCal Greenprint's data to understand how to better plan and prepare for a collective future of growth and environmental leadership.

We appreciate the opportunity to express our support for the continued development of the SoCal Greenprint as part of the August 24 public hearing. We urge you to take the feedback collected to strengthen the tool and develop the resource we need for sustainable growth in Southern California.

Thank you,



Tom Bowman  
President

283 Argonne Avenue  
Long Beach, California 90803  
562-572-3317  
bowmanchange.com



## Building Industry Association of Southern California, Inc.

Greenprint Survey Response  
Southern California Association of Governments  
900 Wilshire Blvd., Suite 1700  
Los Angeles, CA 90017

Re: SoCal Greenprint Themes and Data Survey

On behalf of the Building Industry Association of Southern California (BIASC), thank you for the opportunity to continue our conversation on the SoCal Greenprint. Our concerns with the Themes and Data proposed for the SoCal Greenprint span generally across all data sets and in an effort to reduce repetitive survey submissions, we submit the following comment:

- 1. Require Transparency.** The planned content of Greenprint must be fully disclosed, inclusive of all “factors” chosen to “map” what SCAG’s Greenprint team has concluded is a “constraint” on development in the region, along with the agency, academic, NGO, or other “open source” which developed either the factor, the mapping criteria to measure the factor, or the actual maps that apply each factor. On July 28, 2021 an email was sent that offered the first disclosure of the proposed data list that will be used to create the SoCal Greenprint’s interactive maps. This was an important first step that must be continued, in real time, as changes are made to data points proposed for inclusion within the SoCal Greenprint.
- 2. Require Accountability.** As stated on the SoCal Greenprint website, once developed, the SoCal Greenprint will be an “online mapping tool to help stakeholders prioritize lands for growth and conservation based on the best available scientific data.” The July 28<sup>th</sup> Proposed Data Layer List includes multiple sources that offer data from private organizations and/or data that has not been peer reviewed or credibly vetted, preventing it from being called scientific data. Inclusion of such data sets in the SoCal Greenprint impart the credibility of the SCAG organization to it and as such, create significant new information that can be used in CEQA challenges. To avoid this concern, all data points included in the SoCal Greenprint must, at a minimum, be from official Government sources.
- 3. Right-Size Scope.** Unless otherwise directed by Regional Council Resolution, “Greenprint” shall be applied only to lands designated for open space or agricultural uses in local General Plans, excluding such lands for which transportation projects have been included in the SCAG Regional Transportation Plan (2020). The proposed boundaries of “Greenprint” mapping shall be disclosed within 30 days of the Regional Council direction, and the full draft content of Greenprint shall be disclosed no later than 60 days prior to Regional Council action to approve the final version of Greenprint for its use, as required by Connect SoCal’s Program EIR Agricultural and Biological Resource Mitigation Measures, to identify which of the open space and agricultural lands designated in locally-approved General Plans can also provide agricultural and biological resource mitigation for implementation of the Regional Transportation Plan, and local General Plans.

---

**From:** Appiah, Francis O@DOT [REDACTED]  
**Sent:** Tuesday, August 24, 2021 4:40 PM  
**To:** SCAG Green Region  
**Subject:** Supporting the Greenprint

Hello,

My name is Francis Appiah, Senior Environmental Planner and Mitigation Specialist with Caltrans. I am here to express my support for the SoCal Greenprint project and underscore the importance of data in planning for the future transportation needs of the state and region.

As Connect SoCal made clear, the future of the region's vitality and continued economic prowess depends on building enough homes and ensuring that the transportation network supports the region's mobility needs. That will mean increasing transportation options, continuing to expand the region's transit network and ensuring that roads and highways are safe and maintained.

Transportation projects and smart environmental planning go hand-in-hand. At Caltrans, we understand that any transportation project must consider how to best integrate nature and protect essential natural resources. A tool like the SoCal Greenprint will provide essential information to give us a baseline view of how projects can impact the natural environment and how to be efficient in our planning and development.

Access to information will make it easier for us to identify early challenges, proactively work with community members to build awareness and support, and better understand how to make our projects sustainable. We currently rely on many of the data sources that will be available in the SoCal Greenprint and making them publicly available in one easy-to-navigate location will be an invaluable resource to any planner, transportation agency or developer building any development project in the region.

We urge you to complete the SoCal Greenprint and make the resource widely available to all stakeholders.

Thank you,

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

---

**From:** Appiah, Francis O@DOT [REDACTED]  
**Sent:** Tuesday, August 24, 2021 5:08 PM  
**To:** SCAG Green Region  
**Subject:** Greenprint Support

Hello,

As a Senior Environmental Planner and Mitigation Specialist with Caltrans; I am here to express my support for the SoCal Greenprint project and underscore the importance of data in planning for the future transportation needs of the state and region.

1. As a State Transportation Agency in a busy SCAG Region, having a Greenprint in this region will assist us to plan future projects within the region by considering resources available within the region either to improve the resources or protect them using our best management practice that will bring benefits to these highlighted by this Greenprint.
2. Future Caltrans projects must consider the current issues such sea level rise, adaptation, and resiliency within the SCAG's Region. Having Greenprint in the region will help us to prioritize and address these issues during project planning stages before implementation.
3. Greenprints will allow Caltrans to plan for multiple benefits projects within the region, and as a result, we can create partnerships among practitioners, unlock different funding sources, inform smart growth, and lead to durable and lasting results at many levels and in many sectors.
4. A transportation agency within a data driven Region like ours, A tool like the SoCal Greenprint will provide essential information to give us a baseline view of how projects can impact the natural environment and how to be efficient in our planning and development.

Therefore, we urge you to complete the SoCal Greenprint and make the resource widely available to all stakeholders.

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

Attachment: ATTACHMENT B - Written Comments from the August 24, 2021 Public Hearing (SoCal Greenprint Update)

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**From:** Appiah, Francis O@DOT [REDACTED]  
**Sent:** Tuesday, August 24, 2021 5:59 PM  
**To:** SCAG Green Region  
**Subject:** Favor the SoCal Greenprint

Hello,

After listening to many people talk with my coworker, I heard Housing shortage, but no affordable housing. They did not mention capacity increase on roads and highways when these expensive houses are built. As a staff to transportation agency, I am worry about our infrastructure network such Highways, freeways, bridges and more. Also, water crisis: The Developers and their associations who have concerns did not see water crisis in the SCAG region. One person was bold enough to say there is no shortage of open spaces, but we have seen wildlife such as mountain lions, bobcats, coyotes, to name few coming to residential areas. This means there is a shortage in open spaces, so we need to preserve the existing ones and make that information available for all SCAG citizens and our visitors. Think about future for all. We support the SoCal Greenprint. It has not new laws and it does not against development. Lastly should SCAG tagged UCLA, or USC or UCSB or UCI or any of the institution in the SCAG Region, would the Developers accept or favor the Greenprint? Thank you,

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

Attachment: ATTACHMENT B - Written Comments from the August 24, 2021 Public Hearing (SoCal Greenprint Update)



August 20, 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 an environmental organization, the California League of Conservation Voters writes to express our thanks to 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.

The California League of Conservation Voters represents over 130,000 members, with a mission to protect and enhance the environment and the health of all California communities by electing environmental champions, advancing critical priorities, and holding policymakers accountable.

There is no question that Southern California as a region will continue to expand and develop in the years to come. Southern California needs additional housing and transportation services to help it continue to be an economically vibrant region. The California League of Conservation Voters is a supporter of the SoCal Greenprint because it elevates existing data to help decision makers and stakeholders like ourselves understand how to best integrate nature into the future growth and development of the region.

The SoCal Greenprint is a tool that is in line with SCAG and the region's leadership in ensuring that our continued growth is done so in a sustainable way that prepares our communities for the climate challenges that lie ahead. The tool also ensures the legacy of development in Southern California is about advancing science and data in ways that will guide the development of healthy cities and places for all. As a region, Southern California is connected by watersheds, wildlife corridors, air quality issues and economic activity that is not constrained by jurisdictional boundaries. The SoCal Greenprint will help our organization and others overcome those boundaries to promote smart regional planning that also makes sense locally. We appreciate the opportunity to leverage the SoCal Greenprint's data to understand how to better plan and prepare for a collective future of growth and environmental leadership.

We appreciate the opportunity to express our support for the continued development of

**california league of conservation voters** / [www.ecovote.org](http://www.ecovote.org)

□ 350 Frank H. Ogawa Plaza, Suite 1100, Oakland, California 94612 / phone: 510.271.0900 / fax: 510.271.0901  
□ 6310 San Vicente Boulevard, Suite 425, Los Angeles, California 90048 / phone: 323.939.6790 / fax: 323.939.6791

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the SoCal Greenprint as part of the August 24 public hearing. We urge you to take the feedback collected to strengthen the tool and develop the resource we need for sustainable growth in Southern California.

Thank you,

A handwritten signature in cursive script that reads "Melissa Romero".

Melissa Romero  
Legislative Affairs Manager  
**California League of Conservation Voters**

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**From:** Diep, Deborah [REDACTED]  
**Sent:** Monday, August 9, 2021 1:04 PM  
**To:** Kimberly S. Clark <[Clark@scag.ca.gov](mailto:Clark@scag.ca.gov)>  
**Cc:** [REDACTED]

**Subject:** Greenprint feedback

Hi Kim,  
As follow up to my phone message, I haven't been able to dedicate much time to the Greenprint, but I did notice in the attached document something that I've commented on in regard to other data elements.

The document attached lists SCAG as the source for multiple data points but doesn't differentiate between what the original source data was and how SCAG modified/aggregated/manipulated the data. An example is the land use data. These layers may be the land use categories that SCAG aggregated and standardized from the original source data from the jurisdictions, but the source or description should indicate that. The "SCAG Open Data Portal" isn't actually a source; it is the location of where the data can be found.

Original categories in attached document:  
Source: SCAG Open Data Portal  
Description: This is SCAG's 2016 landuse dataset developed for the Final Connect SoCal, the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), including general plan landuse, specific plan landuse, zoning code and existing landuse.  
Additional Information: ...website link...

Recommended:  
Source: 197 SCAG local jurisdictions' General Plan, specific plan, zoning and existing land use databases from ~2016-2017.  
Description: This land use dataset was aggregated and standardized by SCAG from local jurisdiction land use information developed for SCAG's Final 2020 Connect SoCal, the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), which includes general plan land use, specific plan land use, zoning code and existing land use (year 2016).  
Additional Information/Location: SCAG Open Data Portal ...website link...

BTW- the whole document needs to be proofed, e.g., land use is not one word, but is used as "landuse" throughout.

Let me know if you have any questions.  
Thanks for the consideration.  
Deborah



**Deborah S. Diep**  
Director  
Center for Demographic Research  
1121 N. State College Blvd., Suite 238  
Fullerton, CA 92831-3014



[www.fullerton.edu/cdr](http://www.fullerton.edu/cdr)

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**Attachment: ATTACHMENT B - Written Comments from the August 24, 2021 Public Hearing (SoCal Greenprint Update)**

August 24, 2021

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

Re: SoCal Greenprint

Dear SCAG President Lorimore,

CAUSE is an organization that works to support environmental restoration efforts to enhance equitable access to green space in “park-poor” communities like Oxnard and Santa Paula facing severe health and environmental disparities. Accessing data about existing green space access in our communities is vital to our work. Furthermore, as a community in Ventura County which has been hard-hit by wildfires in recent years, engaging our residents to understand risk and build resilience to natural disasters is more important than ever.

Following the July 1 discussion about the future of the SoCal Greenprint, we urge the SCAG Regional Council to keep the project on track and ensure that the free, interactive, easy-to-use resource is completed in time to make it possible to plan for the sustainable growth needed to build a healthy and vibrant Southern California.

We appreciate the SCAG Regional Council’s efforts to ensure that there is rigorous debate and substantive public input for the launch of the informational resource tool that will make more than 100 publicly available data sources available via interactive maps to make it easier to integrate nature into the future growth and development of the region. We represent one of the more than 60 organizations from across the six counties that have provided feedback and input to get the SoCal Greenprint to where it is today.

The data layers chosen were selected based on feedback provided on what information is essential to the five primary stakeholders that will be building the future of the region: developers, planners, government agencies, community organizations and conservation professionals. Data such as the location of essential infrastructure like sewage lines, where wildfires have historically occurred, groundwater sources and

Attachment: ATTACHMENT B - Written Comments from the August 24, 2021 Public Hearing (SoCal Greenprint Update)

where tree canopies are located are among the maps that will make it clear what the most efficient locations are for building new housing, what natural resources need to be protected and the climate change impacts that need to be considered to build resilient communities.

Access to information will make it easier to build the housing needs required to sustain an economically dynamic region, and that is what the SoCal Greenprint offers. It does not establish new rules, create new regulations or alter existing data, as some opponents have claimed. It was built by experts on environmental stewardship and data, with transparent input from a diverse number of stakeholders, including the building industry, to make it a free, useful and optional resource to protect the environmental assets of the region.

We are eager for the opportunity to reiterate our support for the project and listen to other stakeholders who may have additional feedback to strengthen the usefulness of the tool. However, we hope that the Aug. 24 public hearing and subsequent action serve as a way to improve the tool and process and not derail it. At a time when the threats of climate change – including drought, wildfire, environmental degradation and air quality – are clearer than ever, now is not the time to ignore the information that will empower us to make smarter decisions.

Thank you,

A handwritten signature in black ink that reads "Maricela Morales". The signature is written in a cursive, flowing style.

Maricela Morales, Executive Director

CAUSE (Central Coast Alliance United for a Sustainable Economy)



# City of Mission Viejo

## Community Development Department

**Trish Kelley**  
Mayor

**Wendy Bucknum**  
Mayor Pro Tem

**Brian Goodell**  
Council Member

**Greg Raths**  
Council Member

**Ed Sachs**  
Council Member

Electronic Transmittal:  
[scaggreenregion@scag.ca.gov](mailto:scaggreenregion@scag.ca.gov)

August 13, 2021

Ms. Sarah Jepson  
Planning Director  
Southern California Association of Governments  
900 Wilshire Blvd., Suite 1700  
Los Angeles, California 90017

Subject: City of Mission Viejo Comments: SoCal Greenprint

The City of Mission Viejo appreciates the opportunity to review and provide initial comments on the proposed data layers for SCAG's SoCal Greenprint project, and our key comments are enclosed. We sincerely hope that SCAG's exploration and SCAG's responses to the provided questions and comments, will help the targeted stakeholders – including local jurisdictions and the building community – better understand the proposed scope and application of SoCal Greenprint.

We also appreciate the assistance that SCAG staffmembers Kimberly Clark and India Brookover have provided to us on requested background information on SoCal Greenprint.

Should you have any questions on the City's comments, please do not hesitate to contact our consultant, Gail Shiomoto-Lohr.

Respectfully,

Elaine Lister,  
Director of Community Development  
City of Mission Viejo

Attachment: City of Mission Viejo Comments: SoCal Greenprint

cc: Mayor Pro Tem Wendy Bucknum, SCAG Regional Council District 13 Representative  
Mayor Trish Kelley, SCAG Transportation Committee Representative  
Councilmember Greg Raths, SCAG Energy & Environment Committee Representative  
Dennis Wilberg, City Manager  
Mark Chagnon, Public Works Director  
Larry Longenecker, Planning Manager  
Rich Schlesinger, City Engineer  
Jason Greenspan, SCAG, [greenspan@scag.ca.gov](mailto:greenspan@scag.ca.gov)  
India Brookover, SCAG, [brookover@scag.ca.gov](mailto:brookover@scag.ca.gov)  
Kimberly Clark, SCAG, [clark@scag.ca.gov](mailto:clark@scag.ca.gov)  
Marnie O'Brien Primmer, OCCOG Executive Director, [marnie@occog.com](mailto:marnie@occog.com)  
Nate Farnsworth, OCCOG TAC Chair, City of Yorba Linda, [nfarnsworth@yorbalingaca.gov](mailto:nfarnsworth@yorbalingaca.gov)  
Justin Equina, OCCOG TAC Vice-Chair, City of Irvine, [jequina@cityofirvine.org](mailto:jequina@cityofirvine.org)  
Warren Whiteaker, OCTA, [wwhiteaker@octa.net](mailto:wwhiteaker@octa.net)

**Attachment**  
**City of Mission Viejo Comments: SCAG SoCal Project Greenprint**

**Technical Accuracy of Data Layer; Appropriateness of Including Additional Non-Resource Data Points in Any Proposed Data Layer**

Question/Comment:

Does SoCal Greenprint consist of published data alone, or does it also apply published data to suggest a best management practice or mitigation action? If a SoCal Greenprint data layer proposes recommendations that result from the application of a published data layer, it is critical that the origin data be vetted for accuracy, to avoid incorrect or misrepresented conclusions. Further, the City of Mission Viejo questions the appropriateness of including non-resource data points in any proposed data layer. These topics are illustrated in the discussion of the proposed Tree Equity Score Data Layer (Data Layer #166), as outlined below:

Tree Equity Score Data Layer: #166 and Application to the City of Mission Viejo:

SoCal Greenprint includes Data Layer #166: Tree Equity Score, developed by American Forests (see Exhibit A). The SCAG data layer description says “The Tree Equity Score tool *calculates* a score for all 150,000 neighborhoods and 486 municipalities in urban America. Each score indicates whether there are enough trees for everyone to experience the health, economic and climate benefits that trees provide. The scores are based on how much tree canopy and surface temperature align with *income, employment, race, age and health factors.*” [emphasis added].

The website for the Tree Equity Score explains its use of a 0 to 100 point system to identify how a community fares on the number of trees in the geographic census block group area, with a score of 100 representing tree equity. The first release of scores was conducted in June 2021, and includes cities and towns that have at least 50,000 people.

The City of Mission Viejo is included in the Tree Equity database. There is not a citywide tree score. The City’s Tree Equity Score is based on a specific census block designation. The City’s tree score ranges from a high of 94 for Census Tract 320.27 that also includes the City of Lake Forest, to a low of 36 for Census Block Group 320.223 that includes Saddleback Community College and the Arroyo Trabuco Golf Club. As illustrated in Exhibit B – a print out of the Tree Equity tool – for Census Block Group 320.223, the surface temperature is identified to be 100 degrees, with a current canopy cover of 14% and a recommended canopy cover goal of 48%. In addition, other indicators besides surface temperature have been factored into the development of the tree equity score. These additional indicators include Unemployment, a Health Index, a People in Poverty percentage, a Seniors (65+) percentage, a Children (0-17) percentage, and a People of Color percentage, as illustrated in Exhibit B.

City of Mission Viejo Comments:

- 1) Socioeconomic Data Points Used in Developing the Tree Equity Score: One of the stated objectives of SoCal Greenprint is to map and identify natural resources from already published data. Such a tool allows stakeholders, such as local jurisdictions and project applicants, to understand and achieve an early identification of the location of natural resources in the project study area, and from this inventory, to better plan a project with such natural resources in mind.

The City of Mission Viejo expresses several concerns with the SoCal Greenprint Tree Equity Score data layer, as detailed below:

- a) In developing a Tree Equity Score for a census area, the data layer goes beyond just the identification of natural resources data (i.e., how much tree canopy cover is in the area and what is the reported surface temperature of that area), to also include additional, non-resource data points such as Unemployment, a Health Index, a People in Poverty percentage, a Seniors (65+) percentage, a Children (0-17) percentage, and a People of Color percentage. This tool appears to reach beyond the factual presentation of resource data, to include an application of non-resource related, socioeconomic data points that are weighted and used in the calculation of a community's Tree Equity Score. The City of Mission Viejo expresses concern that this approach seems to delve into a grey, policy area where there has not been any evaluation or acceptance of the approach that uses socioeconomic data points such as unemployment or age cohort data, to not only calculate a community's tree score, but also suggest a proposed percentage of how much more the tree canopy should be increased. The City would suggest that there needs to be a robust vetting and determination to accept any approach that uses more than just natural resource data to compile a community index, in SoCal Greenprint.
- b) Regarding the socioeconomic data points used in the Tree Equity Score Tool, the City of Mission Viejo consulted with the Center for Demographic Research at CSU Fullerton on the non-resource, socioeconomic score indicators that were used. The data points of Unemployment, a People in Poverty percentage, a Seniors (65+) percentage, a Children (0-17) percentage, and a People of Color percentage, largely mirror data points in the U.S. Census American Community Survey (ACS) data. However, in further examining some of the ACS data points, two issues surface:
  - (1) Frequency of Data Layer Updates: The socioeconomic data points in the Tree Equity Score Tool seem to be derived from the 2014 – 2018 ACS, but there is also a more recent and published 2015 – 2019 ACS dataset. Aside from the larger issue of whether non-resource, socioeconomic data should be used in the calculation of a community's tree score, there is the technical question of why the more current 2015 – 2019 ACS dataset is not used, especially when this tool was released in June 2021. How often should we expect any of the data layers to be updated in SoCal Greenprint?

- (2) Accuracy of data points: One of the data points used in the Tree Equity Score Tool, is the percentage of People In Poverty. In looking at the two census block groups in Mission Viejo that have the lowest tree equity scores, there seems to be a disconnect with the percentages reported in the Tree Equity Tool versus what is reported in the ACS. For example, as illustrated in Exhibit B, the Tree Equity Score Tool identifies that Census Block Group 320.223 is reported to have 32% of said census group's population in poverty. However, the 2014 – 2018 ACS data, which is the year of ACS data used for the other socioeconomic data points, identifies that 15% of the population is reported to be in poverty, versus 32%. The current 2015 – 2019 ACS data reports that 17% of the population is reported to be in poverty. Is the Tree Equity Score data point on poverty accurate, or does it use other considerations besides the ACS poverty data information to arrive at the percentage of population in poverty?
- c) Reported Surface Temperatures: Surface temperature represents the heat energy given off by land, buildings and other surfaces. According to the Tree Equity Score Tool methodology, the reported surface temperature is based on USGS Earth Explorer Landsat 8 imagery and thermal bands. However, CalEPA has also been assessing Urban Heat Island Impacts, as a result of AB 296 adopted in 2012. CalEPA's efforts is summarized at:

<https://calepa.ca.gov/climate/urban-heat-island-index-for-california/understanding-the-urban-heat-island-index/>

Of particular interest is the identification that CalEPA is defining and examining the characteristics of the urban heat island for each census tract in and around most urban areas in the State of California. The City of Mission Viejo suggests that the CalEPA effort be examined by SCAG staff, to better understand the status of this effort and if there has been any public outreach on this effort, especially if any of the CalEPA data is planned to be incorporated or applied to other statewide efforts. It would be helpful to know if the CalEPA effort is comparable or compatible with the approach used in the national Tree Equity Tool, especially since CalEPA also identifies that its urban heat index could be used for prioritizing urban greening.

### **Compatibility of SoCal Greenprint Data Layers with Local General Plan and Project CEQA Analyses**

#### Question/Comment:

How is the information in SoCal Greenprint, envisioned to be used or not used, for project mitigation assessment and mitigation? How do the SoCal Greenprint data layers align with data used by local jurisdictions in their environmental assessments? Are there definitive, recognized data sources for certain subject areas, such as Noise?

City of Mission Viejo Comments:

SoCal Greenprint proposes to include data on noise levels for Aviation, Passenger Rail, and Road Noise, using 2018 Noise data from the U.S. Bureau of Transportation Statistics (BTS). This is identified in Proposed Data Layer #13: 2018 Noise Data (See Exhibit C).

From a project analysis perspective, conducting a Noise assessment and mitigating Noise impacts is a requirement of both the California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA). From a General Plan perspective, noise analyses and assessment are conducted to develop a jurisdiction's required General Plan Noise Element, to ensure that the noise contours are used as a guide to establish a pattern of land uses in the Land Use Element to minimize exposure to excessive noise.

The City of Mission Viejo did not know if the use of the U.S. Bureau of Transportation Statistics (BTS) is the definitive data source to measure noise data, and sought the counsel of environmental consultants for their input on this issue. There was consensus that there is no one, individual data source for noise. Further, there was recognition that the BTS data source may have been used because of the large scale of the SCAG region, and the difficulty to consolidate the individual noise contour maps from local jurisdiction General Plans into one map. However, one key concern that was raised, is the level of detail in the BTS source data, and whether it is too generalized to be useful for the SCAG region.

One of the environmental consultants contacted the BTS to better understand what populates the BTS map and the detail level of the data. The U.S. Department of Transportation responded to this inquiry with the following caveat:

*"Please note that the National Transportation Noise Map and associated data were developed for national level analysis and includes simplified noise modeling. It is intended for the tracking of trends and should not be used to evaluate noise levels in individual locations and/or at specific times. There are potential differences in the data sources and the complexity of the models used for noise modeling depending on type of analysis. The term "potential to be exposed" is used because there are several conservative assumptions that go into the analysis. If any one of those assumptions were to change, the noise exposure numbers could also change. For example, the documentation states "Shielding is not considered (i.e. attenuation due to barriers and terrain are not considered)"; for areas that have shielding, the noise levels may be overestimated. The average implies that sound levels could be both higher and lower, depending upon time of day, season of the year, etc. Additionally, sounds from transportation sources other than aviation and road (e.g. rail and maritime) as well as non-transportation sources are not considered. Sounds from things such as construction sites, rock quarries, power plants, etc., could dampen some of the transportation noise."*

The consultant further noted that there could be conflict or inconsistency between local noise assessment data and the BTS noise data. It is recommended that one area that should be further examined, is the BTS's use of a 24-hour  $L_{eq}$  noise measurement. The consultant noted that  $L_{eq}$  data might not provide any nighttime noise weighting that is used for the  $L_{dn}$  measurement in California or the evening weighting for the CNEL metric, which would be important for land use siting decisions in the SCAG region.

The City of Mission Viejo respectfully requests that the use of the 2018 Noise data from the U.S. Bureau of Transportation Statistics be further examined with the input provided by the U.S. Department of Transportation and local environmental consultants consulted.

Related to SoCal Greenprint, the larger key issue is to clearly understand and explain how any data in SoCal Greenprint is to be used for local planning efforts, including environmental assessment and mitigation, and to address the potential that data in SoCal Greenprint may conflict with local planning data, adopted policies and adopted plans.



#	Theme	Data Name	Source	Description	Additional Information
166	Environmental Justice, Equity, and Inclusion	Tree Equity Score	American Forests	The Tree Equity Score tool calculates a score for all 150,000 neighborhoods and 486 municipalities in urban America. Each score indicates whether there are enough trees for everyone to experience the health, economic and climate benefits that trees provide. The scores are based on how much tree canopy and surface temperature align with income, employment, race, age and health factors.	<a href="https://www.americanforests.org/our-work/tree-equity-score/">https://www.americanforests.org/our-work/tree-equity-score/</a>



#	Theme	Data Name	Source	Description	Additional Information
11	Built Environment	Light pollution	1) Falchi, Fabio; Cinzano, Pierantonio; Duriscoe, Dan; Kyba, Christopher C. M.; Elvidge, Christopher D.; Baugh, Kimberly; Portnov, Boris; Rybnikova, Nataliya A.; Furgoni, Riccardo (2016): Supplement to: The New World Atlas of Artificial Night Sky Brightness. GFZ Data Services. <a href="http://doi.org/10.5880/GFZ.14.2016.001">http://doi.org/10.5880/GFZ.14.2016.001</a>  2) Falchi F, Cinzano P, Duriscoe D, Kyba CC, Elvidge CD, Baugh K, Portnov BA, Rybnikova NA, Furgoni R. The new world atlas of artificial night sky brightness. Science Advances. 2016 Jun 1;2(6):e1600377.	www.lightpollutionmap.info is a mapping application that displays light pollution related content over Microsoft Bing base layers (road and hybrid Bing maps). The primary use was to show VIIRS/DMSP data in a friendly manner, but over the many years it received also some other interesting light pollution related content like SQM/SQC measurements, World Atlas 2015 zenith brightness, almost realtime clouds , aurora prediction and IAU observatories features.	<a href="https://www.lightpollutionmap.info/">https://www.lightpollutionmap.info/</a>
12	Built Environment	Desert Renewable Energy Conservation Plan (DRECP) Development Focus Areas & Variance Lands	Bureau of Land Management	Zones where renewable energy development is permitted.	<a href="https://www.blm.gov/programs/planning-and-nepa/plans-in-development/california/desert-renewable-energy-conservation-plan#:~:text=The%20Desert%20Renewable%20Energy%20Conservation,San%20Bernardino%2C%20and%20San%20Diego;">https://www.blm.gov/programs/planning-and-nepa/plans-in-development/california/desert-renewable-energy-conservation-plan#:~:text=The%20Desert%20Renewable%20Energy%20Conservation,San%20Bernardino%2C%20and%20San%20Diego</a> ;  <a href="https://navigator.blm.gov/data?keyword=DRECP">https://navigator.blm.gov/data?keyword=DRECP</a>
* 13	Built Environment	2018 Noise Data	Bureau of Transportation Statistics	Data within the National Transportation Noise Map represent potential noise levels across the nation for an average annual day for the specified year. This dataset is developed using a 24-hr equivalent A-weighted sound level (denoted by LAeq) noise metric. The results represent the approximate average noise energy due to transportation noise sources over a 24-hour period at the receptor locations where noise is computed. Layers include Aviation, Passenger Rail (prototype), and Road Noise for the Lower 48 States as well as Alaska and Hawaii.	<a href="https://data-usdot.opendata.arcgis.com/datasets/2018-noise-data">https://data-usdot.opendata.arcgis.com/datasets/2018-noise-data</a>
14	Built Environment	Local Area Transportation (vehicle miles traveled)	Bureau of Transportation Statistics	Average weekday household Vehicle Miles Traveled (VMT) is the estimated miles traveled by a household. The estimate is derived using data from the National Household Transportation Survey and the American Community Survey. Data is available at the census tract level.	<a href="https://www.bts.gov/latch/latch-data">https://www.bts.gov/latch/latch-data</a>
15	Built Environment	Sewer network - LA county	LA County	Los Angeles Public Works Sanitary Sewer System includes sewer lines, manholes, pump stations, treatment plants and SMD Operations grid.	<a href="https://egis-lacounty.hub.arcgis.com/datasets/lacpw-sanitary-sewer-network">https://egis-lacounty.hub.arcgis.com/datasets/lacpw-sanitary-sewer-network</a>

Attachment: ATTACHMENT B - Written Comments from the August 24, 2021 Public Hearing (SoCal Greenprint Update)

**COALITION A LETTER – COALITION MEMBERS**

Climate Resolve

Endangered Habitats League

CA YIMBY

Abundant Housing LA

Natural Resources Defense Council

Everyone In

Center for Biological Diversity

The Climate Realty Project, Los Angeles Chapter

League of Women Voters of Los Angeles County



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, LA

Carter Rubin  
Mobility & Climate Advocate  
NRDC

Tommy Newman  
Vice President,  
Engagement & 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

Fatima Malik  
President  
League of Women Voters of Los Angeles County

**COALITION B LETTER – COALITION MEMBERS**

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



August 23, 2021

Submitted via email to: [SCAGGreenRegion@scag.ca.gov](mailto: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

**COALITION C LETTER – COALITION MEMBERS**

Southern California Leadership Council  
Los Angeles County Business Federation (BizFed)  
Orange County Business Council  
Inland Empire Economic Partnership  
Los Angeles Area Chamber of Commerce  
Rebuild SoCal Partnership  
Engineering Contractors' Association  
Southern California Contractors Association  
San Gabriel Valley Economic Partnership  
Santa Clarita Valley Chamber of Commerce  
Hispanic 100  
Long Beach Area Chamber of Commerce  
Torrance Area Chamber of Commerce  
Southern Orange County Economic Coalition  
Ventura County Coalition of Labor, Agriculture and Business (CoLAB)  
Construction Industry Air Quality Coalition / Construction Industry Coalition on Water Quality  
NAIOP SoCAL Chapter  
North Orange County Chamber of Commerce



**SOUTHERN CALIFORNIA LEADERSHIP COUNCIL**



**Los Angeles County Business Federation**

Strengthening the Voice of Business Since 2008



**LOS ANGELES AREA CHAMBER OF COMMERCE**



**ORANGE COUNTY BUSINESS COUNCIL**



**HISPANIC 100**  
Leadership • Advocacy • Community

**SCCA**  
SOUTHERN CALIFORNIA CONTRACTORS ASSOCIATION

**CoLAB**  
Ventura County



**SANTA CLARITA VALLEY Chamber of Commerce**

**TORRANCE**  
Area Chamber of Commerce

**The Chamber**  
Long Beach Area Chamber of Commerce

**CIAQC**

**CICWQ**

**nocc**  
NORTH ORANGE COUNTY CHAMBER

**NAIOP**  
COMMERCIAL REAL ESTATE DEVELOPMENT ASSOCIATION  
SoCAL CHAPTER

August 24, 2021

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

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

Dear President Lorimore and Regional Council Members:

Attachment: ATTACHMENT B - Written Comments from the August 24, 2021 Public Hearing (SoCal Greenprint Update)

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Sincerely,



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



Jon Switalski, Executive Director  
Rebuild SoCal Partnership



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



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



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



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



Mario Rodriguez, Chairman  
Hispanic 100



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



Donna Duperron, President & CEO  
Torrance Area Chamber of Commerce



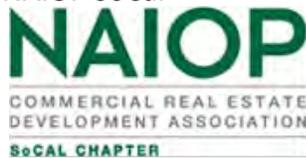
Barbara Thomas, Executive Director  
South Orange County Economic Coalition



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



Timothy Jemal, Chief Executive Officer  
NAIOP SoCal



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



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





August 23, 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,

On August 9<sup>th</sup>, the International Panel on Climate Change announced new findings that climate disruptions are widespread, rapid, and intensifying. While the report's findings were dire, the message was clear: immediate proactive action is needed to mitigate the increasing threats of the climate crisis. Meanwhile, disadvantaged communities – which consist primarily of low-income earners and people of color, continue to suffer disparate impacts from health-harming pollutants. The twin threats of climate and dirty air puts the quality of life, health and lives of California's most vulnerable residents in peril.

We urge you to keep the SoCal Greenprint project on track as it is an important asset in the effort to build an economically vibrant and sustainable region. The SoCal Greenprint 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. Given the challenges that lie ahead, planning has to be smarter and focused on protecting community health and our treasured natural resources.

The SoCal Greenprint does not create new data or regulations. Instead, it makes it easier to understand how to best integrate the environment and into future growth and development. By understanding where existing infrastructure, such as sewage lines, are located, developers can see where it is cheaper and more efficient to build new projects. Knowing where groundwater sources are located can help developers understand how to incorporate water quality features into project designs, resulting in community support for projects and ensuring vital natural resources are protected. City officials can use the data on tree canopies and the urban heat island effect to better understand where more trees are needed.

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Many of the disproportionate impacts facing disadvantaged communities are rooted in both poor land use decisions and historical discrimination. As local governments and developers design the future of our communities, data can help us make better and more equitable decisions. 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 continue moving the SoCal Greenprint along 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 that reads "Christopher Chavez". The signature is fluid and cursive, with a long horizontal stroke extending to the right from the end of the name.

Chris Chavez  
Deputy Policy Director

August 20, 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,

Communities for a Better Environment (CBE) is pleased to submit this letter of support for the completion of the SoCal Greenprint. CBE is a nationally recognized environmental justice (EJ) organization that works to defend the rights of low-income communities of color most impacted by environmental contamination and pollution in California. For more than three decades CBE has organized families from the Harbor Area, South East Los Angeles, East Oakland and Richmond communities to ensure that local and state agencies address efforts in pollution prevention-reduction and building green sustainable communities. CBE provides technical, legal, storytelling, civic engagement, and organizing resources to fully equip community members to create policy and long-lasting change.

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. 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.

Thank you,

A handwritten signature in black ink, consisting of several overlapping loops and a small dot at the top right.

Milton Nimatuj  
Southern California Program Director

**Construction Industry Air Quality Coalition  
Comments on SCAG GreenPrint Program  
Michael Lewis  
August 24, 2021**

I want to express our serious concerns about the construction of the GreenPrint data and its ultimate use.

A great deal of land is held in this region as AG land. It is not used for that purpose, but it becomes a holding zone for land until it is acquired for other uses designated and consistent with community and general plans.

Applying layer, upon layer, upon layer of limitations is not going to help us meet our housing, employment, transportation, or open space goals.

Trying to apply it to some properties and not others is not a realistic application of the data and that is not how it will ultimately be used despite SCAG's disclaimers.

These layers of data are weaponizing the land use process to impede any alternative use of these lands. That will be the real effect of this exercise and it is the goal of some of the advocates.

Shouldn't this data have to meet some minimal test for accuracy or veracity?

Shouldn't there have been some peer review?

Shouldn't it have been subjected to some public review and vetting process?

Accepting raw data from a reasonably biased source is not a sustainable planning process.

Applying these limitations and burdens, and that is what they are—not one of these layers represents an opportunity—to private property without the owner's knowledge or opportunity to refute the accuracy seems entirely unfair and well beyond the scope of SCAG's authority and responsibility.

It also tramples all over the rights of property owners.

Everyone of these layers was created by someone for a specific purpose. Not one of those purposes was more housing, more jobs, more mobility or more recreation.

Where are the priorities in this effort?

Shouldn't all this data be weighted and counterbalanced with the needs of the region?

Elevating the wants of a few special interests without considering the needs of the region and its residents is not providing a useful service or tool for policy makers.

I hope you'll pause this effort and let's step back to the purpose for this effort and craft some objectives that will help the region meet all its goals; not just the narrow objectives of a small group of advocacy organizations looking for a hammer to use in their pursuit of limiting development throughout the region.

**Affiliated Federations**

ANÁHUAK Youth  
Soccer Association

Federación de Clubes y  
Asociaciones de  
Michoacán  
(FEDECAMIN)

Federaciones Colima USA  
(FEDECOL)

Federación  
Duranguense USA

Federación de  
Guanajuatenses

Federación de  
Hidalguenses en California

Federación de Nayaritas  
en Estados Unidos  
(FENAY-USA)

Federación Sonora USA

Fraternidad Sinaloense de  
California, INC (FSC)

Mujeres Unidas Sirviendo  
Activamente (MUSA)

Organización Regional de  
Oaxaca (ORO)

August 24, 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

SCAG President Lorimore,

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Access to data and information is essential in making smart decisions about the future of our communities. 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

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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.

Best,

*Sandy Barrows*  
Conservation Program Assistant  
1515 Sixth St. Coachella, CA 92236  
[sbarrows@cofem.org](mailto:sbarrows@cofem.org)  
(760) 984-2724

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**From:** Diamond Bar-Pomona Valley Sierra Club Task Force  
[REDACTED]  
**Sent:** Tuesday, August 24, 2021 5:40 PM  
**To:** SCAG Green Region  
**Subject:** Public Comment Aug. 24, 2021 Greenprint Hearing

TO: Southern California Association of Governments

RE: Receive Written Public Comments for Public Hearing: Greenprint

To Whom It May Concern ---

My name is Cynthia Robin Artish Smith. I am the chair of the Diamond Bar - Pomona Valley Sierra Club, Angeles Chapter. We are part of the Natural and Farmlands Coalition that supported SCAG's Connect SoCal.

Our support occurred, in part, because of *your* prioritization of conservation in the solutions to achieving sustainable communities. I am here today to support the SoCal Greenprint because of the many benefits it offers the public, decision makers, developers, and planners.

The geography we work with in our area, straddles the Los Angeles and San Bernardino County line. Unfortunately, planners typically only look at the geography they are in and not the entire picture. For example, Diamond Bar's planning stays in Diamond Bar and Los Angeles County—even though some of the connected natural lands here are in Chino Hills, in San Bernardino County.

The regional context of this tool will provide immeasurable value to those of us working in geographies that span multiple jurisdictions.

It is also critically important to provide the entire picture for the SCAG region—not just what's already been conserved or the "what's left" picture.

Even if lands are entitled for a land use other than conservation, the decision to build can *change*. For example, look no further than Orange County, where The Irvine Company chose to donate 20,000 acres of its land, some of which was entitled in Anaheim for housing. This land became the Irvine Ranch Open Space owned and managed by OC Parks.

This is why it is important to keep the entire suite of lands (developed/undeveloped, natural and not) on the map. The context of preserved lands, development, transportation corridors, and possible opportunities for infill or conservation is critically important for the regional view.

Many of us completed the online survey to support the Greenprint layers, and again I offer my full support. Each and every master category sheds light onto an important topic that is relevant to both the natural *and* built environments. We hope the Building Industry Association paid particular attention to this commenting opportunity, which was offered because of its concerns.

In conclusion, planning in a vacuum is *never* a good idea. The inclusivity, accessibility, and regional nature of this information makes the tool valuable to many types of stakeholders.

Thank you for your time and for listening to the many stakeholders that have been engaged in this project for years.

Respectfully Submitted,

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C. Robin Smith, <sup>Chair</sup>  
**324 S. Diamond Bar Blvd. #230**  
**Diamond Bar, CA 91765**  
[REDACTED]

Host Website: <http://www.diamondbarisbeautiful.com>

<https://angeles.sierraclub.org/conservation>

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August 20, 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 - Support**

Dear President Lorimore and Members of the Regional Council:

Endangered Habitats League (EHL) supports the Greenprint. We are a Southern California regional conservation group dedicated to ecosystem protection, sustainable land use, and collaborative conflict resolution.

Over 30 years, we have been part of many endeavors to reconcile environmental and economic interests, particularly housing. Examples are the General Plan in Riverside and Los Angeles Counties, multiple species conservation plans in Orange, Riverside, and Los Angeles Counties, and advanced mitigation for the Orange County Transportation Authority. Currently, we co-chair the San Bernardino County Environment Element, along with the BIA.

In all efforts, stakeholders have reached remarkable consensus on accommodating housing and infrastructure and protecting the environment. The foundation for this consensus has always been in mutually accepted, good information, whether that be biological information or housing projections. The Greenprint is such a source of information. It can provide input for decision-making so that better planning results.

The Greenprint will serve all interests well, and will help identify the best locations for needed housing development. Thank you for your consideration.

Yours truly,



Dan Silver  
Executive Director

Attachment: ATTACHMENT B - Written Comments from the August 24, 2021 Public Hearing (SoCal Greenprint Update)



August 23, 2021

Submitted via email to: [SCAGGreenRegion@scag.ca.gov](mailto: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:

Friends of Harbors, Beaches and Parks (FHBP) has been engaged with SCAG for many years. In 2012, we formed a coalition that promoted natural lands policies and regional advance mitigation programs (RAMPs) at the SCAG level. These policies were ultimately adopted by SCAG leadership in the 2012 Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS). We advanced support of the RTP/SCS again in 2016 with a bigger coalition. In 2020, we were able to gain a broader, more inclusive, and geographically diverse coalition for Connect SoCal. The Coalition is submitting its own Greenprint support letter. This letter serves to communicate FHBP's concerns about delaying the development of this web-based tool.

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

1. 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.
2. The Greenprint has been envisioned since the 2016 RTP/SCS and has broad support. The concerns of the Building Industry Association (BIA) should have been raised in 2016 or in 2020 when this document was being considered and/or during any of the nine meetings held by the Natural and Farmlands Working Group.
3. Conservation of natural lands (parks/open space) is a designated land use and zone. 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*.
4. The existing SCAG HELPR tool looks for potential infill or refill sites for the 6<sup>th</sup> cycle of the Regional Housing Needs Assessment. The conservation community didn't attempt to end this tool when it was released. We recognize housing and natural land preservation must co-exist. Why can't the BIA understand this?
5. 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.

6. 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, you are simply back to siloed planning with cities and counties.

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

Further, having a representative on the Greenprint Steering Committee has been extremely beneficial for Orange County, our Green Vision Coalition, and the broader region. We thank you for the opportunity to serve.

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

Thank you,



Michael Wellborn  
President

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 natural resources conservation organization, we are reaching out 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.

There is no question that Southern California as a region will continue to expand and develop in the years to come. Southern California needs additional housing and transportation services to help it continue to be an economically vibrant region. The Inland Empire Resource Conservation District (IERCD) is a supporter of the SoCal Greenprint because it elevates existing data to help decision makers and stakeholders like ourselves understand how to best integrate nature into the future growth and development of the region. As a public agency that works to promote conservation of natural resources in partnership with residents, municipalities, and other organizations, this tool would be a great asset in our efforts to identify projects that would increase our region's fire resiliency, food security, habitat connectivity, and opportunities to access open space.

The SoCal Greenprint is a tool that is in line with SCAG and the region's leadership in ensuring that our continued growth is done so in a sustainable way that prepares our communities for the climate challenges that lie ahead. As a region, Southern California is connected by watersheds, wildlife corridors, air quality issues and economic activity that is not constrained by jurisdictional boundaries. The SoCal Greenprint will help our organization and others overcome those boundaries to promote smart regional planning that also makes sense locally. We appreciate the opportunity to leverage the SoCal Greenprint's data to understand how to better plan and prepare for a collective future of growth and environmental leadership.

We appreciate the opportunity to express our support for the continued development of the SoCal Greenprint as part of the August 24 public hearing. We urge you to take the feedback collected to strengthen the tool and develop the resource we need for sustainable growth in Southern California.

Sincerely,



Susie Kirschner, Conservation Programs Manager  
Inland Empire Resource Conservation District  
[skirschner@iercd.org](mailto:skirschner@iercd.org)  
(909) 307-4934

Attachment: ATTACHMENT B - Written Comments from the August 24, 2021 Public Hearing (SoCal Greenprint Update)



LA CONSERVATION CORPS

*Transforming Youth. Enhancing Communities.*

**Mailing Address**

P.O. Box 861658, LOS ANGELES, CA 90086-1658

August 20, 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,

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. 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.

Thank you,

DocuSigned by:  
*Wendy Butts*  
3430E70CC0CD419...

Wendy Butts  
Chief Executive Officer

Attachment: ATTACHMENT B - Written Comments from the August 24, 2021 Public Hearing (SoCal Greenprint Update)

August 24, 2021

SCAG Board/Committee,

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.

---

**From:** Maria del C Lamadrid [REDACTED]  
**Sent:** Tuesday, August 24, 2021 5:09 PM  
**To:** SCAG Green Region  
**Subject:** Public comment in support of the SoCal Greenprint

Hello,

Thank you for giving the public the opportunity to provide comments on the SoCal Greenprint. My name is María Lamadrid, a concerned citizen who previously had the pleasure and joy of supporting community members along the LA River as the area developed in the City of Los Angeles.

During my time working to understand the impact of urban renewal as part of the Northeast Los Angeles Riverfront Collaborative Visioning Plan team, I can attest that the SoCal Greenprint is the kind of tool that would have truly helped promote access to affordable housing, increase transportation options while also protecting the natural ecosystem of our community.

We had the resources, time and interest to drive an effective holistic process. Yet a tool like the SoCal Greenprint would have really lower the threshold of participation for many in the community to advocate for and participate in the urban planning process. Do not leave other small community groups without the resources to steer effective urban growth.

We must take immediate action to continue the vital work of releasing the SoCal Greenprint. Thinking that development and conservation are mutually exclusive is an antiquated idea that will bring harm now and to future generations. If the Covid-19 crisis has made even more clear is that we live in a period of constant change where not inaction has grave consequences.

Housing, transportation, public health, and climate are intersectional issues that, when not addressed holistically, impact those at the margins. Not continuing forward with the commitment to complete the SoCal Greenprint as envision is truly an equity and self-realization injustice.

I urge the council to publicly back the SoCal Greenprint.

Maria del Carmen Lamadrid

August 24, 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

August 13, 2021

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

**RE: SoCal Greenprint Comments**

Dear Executive Director Ajise,

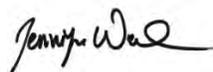
Orange County Business Council (OCBC), the leading voice of business in Orange County, appreciates the opportunity to comment on the development of the SoCal Greenprint. OCBC thanks the Regional Council for responding to feedback from experts in the business and development community and other key stakeholders in Southern California and allowing for additional time to review the Greenprint and provide feedback to SCAG. Amendments are needed to ensure the Greenprint is a successful land use tool without hindering housing production.

As you know, Southern California is suffering from a housing crisis. OCBC's "[2019-20 Workforce Housing Scorecard](#)" found that Orange County has an existing shortfall of 58,000 units. This shortfall will likely grow to over 114,000 units unless housing production can meet new job growth and population growth. Given the severity of the region's housing needs, it is crucial that new obstacles to housing production are not introduced—whether intentional or unintentional.

The Greenprint is described as a "strategic conservation mapping tool" to "protect, restore, and enhance natural lands, public greenspace, working lands, and water resources." While OCBC supports this goal, it must be balanced with the SCAG region's dire housing needs. As currently drafted, Greenprint's Proposed Data Layer List includes multiple data sources that lack the credibility to be considered scientific, yet by adding them to Greenprint, they could be seen as more legitimate than they are. As expressed from multiple speakers who are experts in this field during SCAG's Regional Council meeting on July 1, 2021, this data could be used in California Environmental Quality Act (CEQA) litigation resulting in detrimental, unintended consequences for housing or transportation projects. CEQA litigation abuse is already significant roadblocks for developers; adding another way for housing opponents to bolster CEQA lawsuits by citing the Greenprint's data as scientific would be counterproductive to SCAG's Regional Housing Needs Assessment (RHNA) and the region's holistic housing efforts. Instead, OCBC recommends SCAG only include data from official government sources in the Greenprint. OCBC also urges SCAG to continue notifying all stakeholders of all changes to data, maps and constraints within the Greenprint and their sources in real time. OCBC supports these and other recommendations provided by the building industry and encourages SCAG to continue working with Orange County stakeholders to ensure our shared goals for housing, transportation, and sustainability are mutually achievable.

Thank you for your consideration and we look forward to revising the Greenprint further to create a tool that has the support of housing, business, transportation, conservation and local government stakeholders.

Sincerely,



Jennifer Ward  
Senior Vice President of Advocacy and Government Affairs

**From:** Warren Whiteaker [REDACTED]  
**Sent:** Friday, August 13, 2021 11:12 AM  
**To:** SCAG Green Region <[scaggreenregion@scag.ca.gov](mailto:scaggreenregion@scag.ca.gov)>  
**Subject:** Comments on Proposed Data Layer List

Please see comments below on data layers. Most comments note a broken link.

#	Theme	Data Name	Comment
1	Agriculture and Working Lands	Farmland Mapping and Monitoring Program	Both URLs listed in "Additional Information" are broken links
5	Agriculture and Working Lands	Community Gardens	Consider additional instructions on how to access community gardens layer. Unclear if the layer is available from provided link
6	Agriculture and Working Lands	Agritourism Locations	Only cheese and wine links work
19	Built Environment	Riverside County eRED	Second URL is broken link
20	Built Environment	Imperial Overlay	URL is broken link
21	Built Environment	San Bernardino Renewable Energy Element	URL requires access; returns 403 error
31	Vulnerabilities and Resilience	Fire Hazard Severity Zone	URL is broken link
36	Vulnerabilities and Resilience	Alquist-Priolo Faults	Requires ArcGIS login to access site
49	Context/Water Resources	Water Service Districts	URL is broken link
70	Context	County Boundaries	URL is broken link
80	Environmental Justice, Equity, and Inclusion	Trails - CA State Parks	Link returns a runtime error; potential broken link
91	Environmental Justice, Equity, and Inclusion	National Historic Trails	Second and third URLs are broken links
92	Environmental Justice, Equity, and Inclusion	Trails - Orange County	URL is broken link
94	Environmental Justice, Equity, and Inclusion	Priority growth areas	First URL requires ArcGIS login to access site
104	Environmental Justice, Equity, and Inclusion	Urban Displacement	URL is broken link
106	Environmental Justice, Equity, and Inclusion	Trails - Ventura County	Requires ArcGIS login to access site
125	Habitat and Biodiversity	Resilient Connected Network (All)	Middle URL is broken link

Thanks,  
Warren

Warren Whiteaker | he/him  
Principal Transportation Analyst  
Long-Range Planning & Corridor Studies  
**Orange County Transportation Authority**  
[REDACTED]

*Together, We Move Orange County Forward*

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Attachment: ATTACHMENT B - Written Comments from the August 24, 2021 Public Hearing (SoCal Greenprint Update)

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,

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. 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.

Thank you,

Andrea Vidaurre  
Peoples Collective for Environmental Justice



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.

Attachment: ATTACHMENT B - Written Comments from the August 24, 2021 Public Hearing (SoCal Greenprint Update)

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

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**From:** Anna Christensen [REDACTED]  
**Sent:** Tuesday, August 24, 2021 4:37 PM  
**To:** SCAG Green Region  
**Subject:** SO CAL Greenprint comment

To: SCAG  
Re: So Cal Greenprint  
From: Puvungna Wetlands Protectors, Sierra Club's Los Cerritos Wetlands Task Force

SCAG needs to:

1. Include significant tribal sites on the SoCal Greenprint  
Tribal reservations  
Sacred sites - consult Native American Heritage Commission (NAHC)  
Tribal Traditional Properties, Tribal Traditional Landscapes  
Names of major original tribal community/village sites

Examples:

1. Puvungna Village National Register Site on the campus of CSULB and at Rancho Los Cerritos, also registered as a Sacred Site with the NAHC
2. The Los Cerritos Wetlands (part of the Traditional Tribal Landscape of Puvungna)
3. The Ballona Wetlands
4. Bolsa Chica Mesa and Wetlands
5. Kuruvungna spring on the campus of University High School, Los Angeles

2. Ensure California Native American representation, input, and outreach

In creating, reviewing, promoting, and implementing SC Greenprint, SCAG must ensure California Native American representation on staff, on Steering, Advisory, and Scientific committees, and in partnerships and rapid assessments. Outreach to tribal communities through governmental agencies and other organizations representing tribal peoples, especially those indigenous to Southern California. Taking direction from indigenous peoples is also far more intelligent and respectful than simply allowing comment ("consultation") on plans designed by, and primarily for, non-natives.

3. Prioritize preservation of natural open spaces and tribal sites over development, including erase and replace "restoration" projects

The preservation of existing natural open spaces is aligned with the protection of California Native American culture, Sacred Sites, tribal lands, and indigenous plants and animals. Prioritizing preservation over restoration may seem counter intuitive until one realizes that restoration projects are increasingly likely to include remove and replace strategies that erase both existing ecosystems and California Native American history.

4. Decolonize

Implement measures ensure that SCAG representatives and staff embrace their responsibilities as caretakers and unlearn mainstream assumptions about land as property, ownership of land/mineral and water rights, right to exploit/pollute air, water, land, and prioritizing expanding the human footprint at the expense of other species and the natural world.



August 19, 2021

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

Dear Mr. Lorimore,

I am writing to confirm my positive experience with and practical utility of the Pajaro Compass framework, its resources, and online tools, which are similar to what is being developed for the SoCal Greenprint Project, when planning transportation infrastructure projects.

I oversee the environmental clearance of two major transportation projects in the Pajaro River Watershed, which includes an area of approximately 1,300 square miles in Southern Santa Clara County and San Benito County. These projects are the U.S. 101 Improvement Project (Monterey Road to State Route 129) and State Route 152 Trade Corridor Project. The US 101 Improvement Project consists of widening US 101 from Gilroy to State Route 129, a distance of approximately 7 miles, and reconstructing the U.S. 101/State Route 25 Interchange. The State Route 152 Trade Corridor Project consists of constructing a new 4-lane freeway between U.S. 101 and State Route 156 and providing eastbound truck climbing lanes over Pacheco Pass. Both these projects are located in rural areas with considerable environmental resources including sensitive habitats, special status species, agricultural lands, floodplains, cultural resources, and so on.

When planning such large projects, notable resources such as the Pajaro Compass Network and Pajaro Compass Webmap have proven to be extremely valuable tools. The Network itself provides access to key stakeholders in order to understand public concerns and design constraints during the project planning and engineering phases. I appreciate this engagement as it helps VTA develop the best project possible while considering the concerns of those for whom a project directly or indirectly affects. The Pajaro Compass Webmap includes multiple layers to identify sensitive resources, other environmental concerns, and potential mitigation opportunities. While ground-truthing in formal technical analysis is required during project development, the Webmap provides an excellent overview and starting point to identify these resources at both the local and regional scale.

VTA is an independent special district that provides sustainable, accessible, community-focused transportation options that are innovative, environmentally responsible, and promote the vitality of our region. VTA fully supports the Pajaro Compass Network and use of the Webmap and other resources developed as part of the overall framework. The development and implementation of the SoCal Greenprint Project should provide equivalent benefits to planners, designers, and decision-makers of public and private projects in the region for which the Greenprint serves.

Sincerely,

*Ann Calnan* (electronically signed)

Ann Calnan  
Manager, VTA Environmental Programs  
(408) 321-5976

Attachment: ATTACHMENT B - Written Comments from the August 24, 2021 Public Hearing (SoCal Greenprint Update)

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.



August 18, 2021

***Via Electronic Mail***

[scaggreenregion@scag.ca.gov](mailto:scaggreenregion@scag.ca.gov))

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

**RE: Comments to SoCal Greenprint**

Dear Members of Board, Committee Members, and Staff:

Tejon Ranch Company, on behalf of itself and its subsidiary/affiliated entities Tejon Ranchcorp and Centennial Founders, LLC (collectively, the “Tejon Ranch”), submit this comment letter objecting to the inclusion of the Antelope Valley Regional Conservation Investment Strategy (AVRCIS) as a data source in the SoCal Greenprint. The October 2019 Public Draft AVRCIS is fatally flawed both substantively and procedurally, and as such SCAG must take no further action to incorporate the AVRCIS into the Greenprint.

Beginning as far back as the AVRCIS’s Steering Committee’s comment period in the fall of 2017, Tejon Ranch has consistently and repeatedly requested to both the Desert and Mountain Conservation Authority (“DMCA”), the nominal public agency sponsor of the AVRCIS, and the California Department of Fish and Wildlife (“DFW”), the approving government agency, to not be included in the study or modeling on which the AVRCIS is based. This position is based on the fact that Tejon Ranch lands do not promote the primary stated purposes of the AVRCIS and the modeling used in the AVRCIS is not based upon the best available science.

The AVRCIS’s primary purpose to aid in identifying “areas for compensatory mitigation for impacts to species and natural resources” and to “support mitigation needs” for various large-scale infrastructure, energy and development projects. To that end, Tejon Ranch has already availed itself of, and is presently implementing the statutory purpose behind the AVRCIS legislation as (1) Tejon Ranch had already agreed to conserve 90% of its 270,000 acres in exchange for the ability to engage in development on the remaining 10%, pursuant to the landmark 2008 Tejon Ranch Conservation and Land Use Agreement and (2) the 2008 agreement, which was entered with various environmental groups and with the endorsement of California governmental resource agencies, identified land for development based on scientific analysis demonstrating the areas for development would occur in less environmentally sensitive parts of Tejon Ranch.

As to the second point, Tejon Ranch has submitted to both DMCA and DFW that recent project level environmental analysis conducted for Tejon Ranch lands is more specific than the modeling used for the AVRCIS. Specifically, project level environmental documents, which are publicly available, provide more sophisticated, higher accuracy localized ecological mapping and analysis which represents better

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Tejon Ranch Co. (NYSE:TRC)—a diversified real estate development and agribusiness company.

available scientific information than relied on by the AVRCIS's modeling. In fact, the AVRCIS itself recognizes there are deficiencies and gaps in its modeling.

Notwithstanding Tejon Ranch's request to be removed, and the compelling basis for this request, the AVRCIS Steering Committee nonetheless opted to include Tejon Ranch lands within the study area – without even notifying Tejon Ranch Company that its property was so included. Only after continuous and repeated requests that the Tejon Ranch lands be excluded from the AVRCIS study area and modeling did Tejon Ranch finally receive written representation from DMCA representatives stating that after consulting with the AVRCIS Steering committee that Tejon Ranch lands would be removed from the AVRCIS study area as well as the AVRCIS would be removing any references to Tejon Ranch lands, including narrative analysis, mapping overlay and other modeling. However, upon publication of a later AVRCIS draft, Tejon Ranch learned that notwithstanding Tejon Ranch lands being removed from the AVRCIS study area, Tejon Ranch lands still remain within the modeling used for the AVRCIS. Since this discovery of this intentional omission, Tejon Ranch has strongly urged DFW, DMCA and those preparing the AVRCIS to consider taking immediate steps to remove all mapping, depiction, visualization and other analysis or narrative from Tejon Ranch lands during its deliberation of its Final approval process. As of the date of this letter, DFW has not approved the final form of the AVRCIS, but instead continues to deliberate its completeness and substance.

Inclusion of the October 2019 draft AVRCIS as a data source in creation of the SoCal Greenprint would be both premature and potentially misleading to the public, as the final version of AVRCIS, once approved by DFW, has the potential to materially deviate from the October 2019 draft version which is now proposed to be made part of the Greenprint.

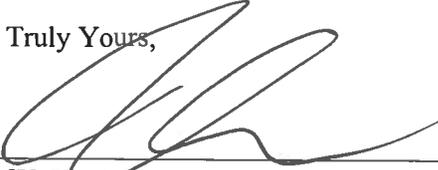
Additionally, it is Tejon Ranch's belief that the draft AVRCIS (and its inaccurate conclusions) are now being used by certain members of the environmental community, including Center for Biological Diversity, Natural Resources Defense Council, Endangered Habitats League, California Native Plant Society and others to name a few (all members of the AVRICS Advisory Committee), to challenge approvals of Tejon Ranch's Centennial master plan community in Los Angeles County, specifically, and Tejon Ranch development of its lands at large, as evidence by several lawsuits against Tejon Ranch which remain in various stages of litigation. It is of significant concern from a conflict of interest standpoint that these environmental groups have played central roles in the AVRCIS process that has been managed by DMCA and have been and continue to use the AVRCIS process to block the Centennial project and Tejon Ranch land use development in general, on the other hand. It is a grave concern how current litigants such as CBD and the other environmental groups mentioned in this paragraph can serve in an independent, non-biased capacity to craft a resource conservation program, where the program covers the very area where they have filed suit and continue to try and challenge Tejon Ranch projects. These blatant conflicts of interest do not appear to have been disclosed to DMCA or DFW. Governmental decisions, such as DMCA's decision to act as the "public agency" submitting the AVRCIS or its decision to approve a draft AVRCIS, or such as DFW's decision to approve an RCIS should not involve the participation of such heavily self-interested individuals or groups. It is apparent to Tejon Ranch that the same conflicted environmental groups now are engaged in weaponizing and hijacking SCAG's Greenprint program for its own purposes, by championing as part of Greenprint's underlying data source, a known unsanctioned and controversial resource conservation program, the AVRCIS, which will be utilized by municipalities, planners, infrastructure agencies, community based organizes and other to guide and shape regional development and land use decisions for the foreseeable future.

As an additional point of interest to you, The Nature Conservancy, who SCAG has engaged to consult on Greenprint was also a member of the AVRCIS team. This fact raises yet another conflict of interest with the submission of the AVRCIS for inclusion in the Greenprint effort. This appears to be a coordinated effort by several conflicted participants in the AVRCIS process to give legitimacy to this self-serving and deeply flawed draft document by having it adopted by SCAG as best available science. Further, submittal of the draft AVRCIS is inappropriate as it is still under review and not approved by CDFW. These facts should give rise for grave concern to SCAG in considering the inclusion of the AVRCIS data in its Greenprint process.

To assist SCAG on our historic involvement with this effort, I am attaching two of several letters reflective of our constant ongoing objections to this process and the draft document, one of which includes correspondences authored by LA County as to their objections at the time.

Given that the AVRCIS is flawed for the reasons described above, SCAG must remove the AVRCIS for the data source of its Greenprint program. Inclusion of the draft AVRCIS is highly problematic and unjustly favors the self-serving interest of environmental groups, who are active insider participants in the AVRCIS and Greenprint process.

Very Truly Yours,



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Marc W. Hardy  
Senior Vice President, General Counsel

Attachments



February 6, 2020

Via Overnight Courier & Electronic Mail  
(diane.sacks@mrca.ca.gov)  
Desert & Mountain Conservation Authority  
Attn.: Diane Sacks  
44811 N. Date Ave., Suite G  
Lancaster, CA 93534

Via Overnight Courier & Electronic Mail  
(rcis@wildlife.ca.gov)  
California Department of Fish and Wildlife  
Habitat Conservation Planning Branch  
Attn.: Antelope Valley RCIS Comments  
1010 Riverside Parkway  
West Sacramento, CA 95605

**Re: Antelope Valley Regional Conservation Investment Strategy (“AVRCIS”)  
October 2019 Public Draft**

To Whom It May Concern:

Tejon Ranch Co., on behalf of itself and its subsidiary/affiliated entities Tejon Ranchcorp and Centennial Founders, LLC (collectively, the “Tejon Ranch”), submits the comments contained in this letter pursuant to California Fish & Game Code section 1854(c)(2).<sup>1</sup> The comments contained in this letter pertain to the October 2019 Public Draft AVRCIS. We understand that the Desert & Mountain Conservation Authority (“DMCA”) is statutorily obligated to respond to the comments contained in this letter. However, this letter should be independently considered and responded to by the California Department of Fish & Wildlife (“DFW”) as part of any determination to issue a final approval of the AVRCIS because the concerns expressed herein relate to the DMCA’s compliance with several statutory requirements contained in Sections 1850–1861 (hereafter, the “RCIS Statute”) and DMCA’s compliance with the *Regional Conservation Investment Strategies Program Guidelines (September 2018)* (hereafter, the “2018 Guidelines”), all of which are applicable to the AVRCIS.

**I. Background and Summary of Comments**

Tejon Ranch is proud of the continuing role it plays in conserving land with ecological value. In 2008, Tejon Ranch voluntarily entered the Tejon Ranch Conservation and Land Use Agreement (the “Ranchwide Agreement”), which to date is the largest private land conservation commitment in California history.<sup>2</sup> At the time, DFW expressed strong policy level support for

<sup>1</sup> All references to code sections in this letter are to the California Fish & Game Code unless otherwise noted.

<sup>2</sup> The Ranchwide Agreement is available at:

<https://www.sec.gov/Archives/edgar/data/96869/000119312508138009/dex1028.htm>. Signatories to the Ranchwide Agreement include the Tejon Ranch Conservancy, along with the Natural Resources Defense Council, the National Audubon Society, the Sierra Club, the Endangered Habitats League and the Planning and Conservation League (collectively, “resource groups”). Most of the resource groups participated in preparing the AVRCIS, with representatives serving on the Steering Committee and/or Advisory Committee. Also, several of AVRCIS’s leaders (such as Terry Watt, Graham Chisholm, Dan Silver and Gary George) are either current or past board members of the Tejon Ranch Conservancy. These facts, which raise serious conflict of interest concerns, are addressed below.

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Tejon Ranch's commitment, as evidenced in a May 1, 2008 letter signed by the California Department of Fish and Wildlife. (See Attachment 1.) Pursuant to the Ranchwide Agreement, Tejon Ranch agreed to conserve 240,000 of its 270,000 acres (almost 90% of its landholdings) in perpetuity. To date, over 110,000 acres have been conserved through the recordation of conservation easements (including approximately 61,000 acres that were conserved with funding from the Wildlife Conservation Board). While Tejon Ranch is highly concerned with how the AVRCIS has been developed, and with the scientific modeling used to create it (especially in light, as discussed below, of the extensive ecological studies that underly the Ranchwide Agreement), Tejon Ranch's commitment to voluntarily conserve its land in perpetuity is consistent with some of the aspirational goals DFW seeks to achieve with the RCIS program.

Throughout the entirety of the AVRCIS process, Tejon Ranch has repeatedly requested that its lands not be included in the study area or in the scientific modeling on which the AVRCIS is based. Our request is based on well-reasoned (and previously articulated) justifications. Foremost among these reasons is that the inclusion of Tejon Ranch lands does not promote the primary stated purpose of the AVRCIS. This rationale is further discussed in Heading II.A below. Second, as explained in Heading II.B below, the scientific modeling underlying the AVRCIS is not even the best available science (insofar as AVRCIS modeling overlaps Tejon Ranch lands and other areas where project-level or planning-level ecological analysis have been conducted). On this point, as detailed further below, the RCIS Statute requires that the DMCA and DFW recognize recent project-level environmental analysis conducted for Tejon Ranch lands, and project-level and planning level analysis for other areas, is far more reliable than the scientific modeling used for the AVRCIS.

Separate from the rationale summarized in the previous paragraph, it is also appropriate to remove Tejon Ranch lands entirely from the scientific modeling because those preparing the AVRCIS previously committed on numerous occasions that this would occur, and doing so is consistent with the fact that Tejon Ranch lands are not located in the AVRCIS study area. Notwithstanding Tejon Ranch's numerous requests (which began in 2016 and have been re-made as recently as October 10, 2019), and notwithstanding promises by those preparing the AVRCIS,<sup>3</sup> Tejon Ranch lands were included in an early June 2017 "Administrative Draft" version of the AVRCIS. It was only after additional communication with the AVRCIS's preparers that Tejon Ranch lands were removed from the study area, consistent with the reasons expressed below in Section II. (See Attachment 2, email exchanges with AVRCIS preparers.) However, on October 11, 2019 Tejon Ranch representatives learned that those preparing the AVRCIS decided not to remove Tejon Ranch lands from the scientific modeling used for the AVRCIS because re-running the modeling would be "costly." The failure of those preparing the AVRCIS to re-run the scientific modeling contradicts express assurances made to Tejon Ranch that the AVRCIS would be revised so that "modeling results are not extended beyond the RCIS boundary." (See Attachment 2, quoting June 30, 2019 email response from Mr. Chisholm.) Therefore, Tejon Ranch lands should be removed entirely from the scientific modeling because assurances were made by those preparing the AVRCIS, and Tejon has relied on those assurances to its detriment. (See *HPT IHG-2 Properties Trust v. City of Anaheim* (2015) 243 Cal.App.4th 188.)

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<sup>3</sup> In a July 17, 2016 email, Ms. Terry Watt stated that "Tejon Ranch ownership has been taken out of the RCF [Regional Conservation Framework, the precursor to the AVRCIS] plan area . . . ."

Finally, as explained in Heading III below, the AVRCIS’s preparers have ignored several statutory requirements. These deficiencies were previously brought to the attention of both the AVRCIS preparers and DFW. Furthermore, because AVRCIS preparers are operating under the incorrect assumption that the AVRCIS process was initiated by DMCA prior to January 1, 2017 (a point that is analyzed in more detail below and clearly refuted by documentary evidence), the AVRCIS does not conform to recommendations contained in the 2018 Guidelines. With respect to the comments made in Heading III, it seems clear that the AVRCIS process must start over and that DFW is not even able to approve the AVRCIS without the process beginning anew.

**II. Tejon Ranch Lands Were Properly Excluded from the Study Area and Should Be Removed from the Scientific Modeling**

The AVRCIS study area appropriately does not include Tejon Ranch lands. To be consistent with that determination, to comply with requirements in the RCIS Statute and to honor the promises made by preparers of the AVRCIS that the AVRCIS would be revised so that “modeling results are not extended beyond the RCIS boundary,” the AVRCIS’s scientific modeling should not include Tejon Ranch lands.

**A. Including Tejon Ranch Lands in the AVRCIS’s Modeling is Contrary to Both the RCIS Statute and AVRCIS’s Stated Purpose Because Tejon Ranch Lands are Already Subject to a Comprehensive Conservation Plan.**

The RCIS Statute identifies the legislative intent of the RCIS program: To “identify species and habitat conservation initiatives at a regional scale . . . in order to guide voluntary investments in conservation, and compensatory mitigation for impacts to ecological resources . . . .” (§ 1850(a) (emph. supp.), *see also* subdiv. (b).) The AVRCIS is supposedly drafted to implement this statutory purpose and is intended to “guide voluntary conservation actions and mitigation actions . . . in conjunction with public infrastructure and forest management.” (AVRCIS at p. 1-1.) In this regard, the AVRCIS’s stated primary purpose is to aid in identifying “areas for compensatory mitigation for impacts to species and natural resources” and to “support mitigation needs” for various large-scale infrastructure, energy and development projects. (AVRCIS at p. 1-3; *see also* p. 4-1.) Said another way, the purpose of the AVRCIS is to provide a basis for voluntary investments in conservation and to encourage mitigation agreements in furtherance of development projects.

Notwithstanding the primary purpose for which the AVRCIS is being developed (and the legislative purpose identified in Section 1850), Tejon Ranch already has availed itself of, and is presently implementing, a comprehensive and binding mitigation and conservation strategy for its land. To this point and as mentioned above, the Ranchwide Agreement obligates Tejon Ranch to preserve approximately 240,000 acres of specifically identified land through the phased dedication of conservation easements. Identifying the location of the easements was subject to significant and detailed biological analysis and negotiation between Tejon Ranch and the resource groups during preparation of the Ranchwide Agreement.<sup>4</sup> Further, as noted in Section I above, of the total 240,000 acres that will be conserved, approximately 110,000 acres is already subject to recorded

<sup>4</sup> Several of the AVRCIS’s primary preparers and leaders (most notably Terry Watt and Graham Chisholm) were directly involved in the process of reviewing biological analysis and identifying the exact locations of land to be conserved at Tejon Ranch as part of developing the Ranchwide Agreement.

conservation easements (including approximately 61,000 acres preserved with funding from the Wildlife Conservation Board). Specific to the reasoned explanation for why Tejon Ranch lands should be entirely excluded from both the study area and the scientific modeling, the Ranchwide Agreement expressly states that the “commercial operation of a mitigation bank, or the sale or other transfer of mitigation ‘credits’” within conservation easements is prohibited. (*See* Ranchwide Agreement, Exh. M, § 2(a)(11).) As a result of this prohibition in the Ranchwide Agreement, there is no land on Tejon Ranch within which the primary purpose of the RCIS Statute or the AVRCIS can be achieved. Importantly, as reflected elsewhere in this letter, the unavailability of Tejon Ranch for commercial operation of mitigation banking is known to a primary preparer of the AVRCIS – Graham Chisholm was a signatory to the Ranchwide Agreement and a former director of the Tejon Ranch Conservancy.

Simply put, the Ranchwide Agreement (i) already establishes a binding and comprehensive framework on Tejon Ranch for mitigating impacts of development,<sup>5</sup> (ii) creates the funding mechanism by which such preservation will be maintained in perpetuity and (iii) prohibits operation of commercial mitigation banks or sale of mitigation credits. For these reasons, Tejon Ranch’s land was properly excluded from the AVRCIS study area and must be removed from the scientific modeling.

B. The AVRCIS’s Scientific Modeling Fails to Include Best Available Science for Land Within the Modeling Area.

The RCIS Statute requires that the AVRCIS incorporate and rely on “the best available scientific information regarding the strategy area and the surrounding ecoregion . . .” § 1852(b)(14) (emph. supp.). The AVRCIS does not reflect best available science for Tejon Ranch lands. On this basis, the AVRCIS’s modeling must either entirely exclude Tejon Ranch lands or be re-run to include best available scientific information.

The AVRCIS states that it is “based on the best available biological land use planning information.” (*See* AVRCIS at p. 1-4.) This is not accurate. In fact, there is no demonstrable proof provided in the AVRCIS that this claim is correct. The AVRCIS also asserts it was “developed in concert with other key planning efforts that overlap in the RCIS area. Primarily it builds on existing information provided in the State Wildlife Action Plan (SWAP), DRECP, California Desert Biological Conservation Framework, and the Significant Ecological Areas identified in the *Los Angeles County 2035 General Plan*.” (*Ibid.*) This is also inaccurate. Several facts contradict these statements and demonstrate the scientific modeling’s deficiency:

- The AVRCIS’s scientific modeling includes Tejon Ranch lands, but the modeling fails to utilize project-level habitat data from documents that were prepared pursuant to the California Environmental Quality Act (“CEQA”) for the Centennial Specific Plan. The Centennial Specific Plan was approved by the Los Angeles County Board of Supervisors in April of 2019, following certification of a Final

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<sup>5</sup> The DFW’s 2008 letter supporting the Ranchwide Agreement (*see Attachment 1*) acknowledges that Tejon Ranch’s commitment to conserve the vast majority of Tejon Ranch’s property was done for the purpose and with the intent to “meet the land conservation and corresponding natural resource mitigation requirements for the planned development and other activities within the Developed Areas,” including development in the Los Angeles portion of Tejon Ranch known as the Centennial Specific Plan that is adjacent to the AVRCIS study area.

Environmental Impact Report (SCH No. 2004031072), which documentation had been released for public comment in 2017.

- The AVRCIS modeling and study area includes lands within the State Route 138 right of way, but neglects to utilize project-level habitat data from publicly-available documents that were prepared pursuant to CEQA for the California Department of Transportation (“CalTrans”) project to widen State Route 138 (SCH No. 2013111016).
- The AVRCIS modeling and study area includes lands that were subject to the Antelope Valley Area Plan (“AVAP”), but does not utilize planning-level habitat data from CEQA documents that were prepared for the AVAP, including a certified Final Environmental Impact Report (SCH No. 2014061043).

These three environmental documents – two of which are project-level and all of which are publicly available– provide the best available science for those projects. They are more refined, have higher accuracy and (as to the project level documents) offer localized ecological mapping and analysis. These documents, therefore, collectively provide better available scientific information than the information relied on for the AVRCIS’s modeling. As a result, not only are statements contained in the AVRCIS that its modeling represents “best available science” inaccurate, but such statements impact other characterizations and conclusions made in the AVRCIS. For instance:

- Statements made on AVRCIS page 1-5 in Items 3, 5 and 7 relating to the comprehensiveness and quality of AVRCIS analysis inaccurately suggest the AVRCIS’s modeling is the most reliable. In fact, the analysis and mapping contained in the environmental documents for Centennial, AVAP and the State Route 138 widening are more specific and more accurate.
- AVRCIS Section 2.1.4.3 (at p. 2-32) states that notwithstanding limitations inherent in species modeling, “[s]pecies habitat distribution modeling improves the RCIS planning process in the following ways [¶] • Extrapolates habitat distribution across areas lacking adequate data from field surveys.” However, in the project-level cases noted above there are field surveys that provide data and these studies are publicly available. The AVRCIS proponent, DMCA, must justify why such data is not being used given the statutory requirement that an RCIS rely on best available science.
- AVRCIS Section 2.1.4.3 (at p. 2-34) states that “We created an additional dataset called *species focal areas* to emphasize modeled species habitat that overlaps with known occupied habitat. . . . Species focal areas were created by buffering known point occurrences (since 2000) by distances that estimated the species’ primary activity areas (Table 2-5).” (Emph. supp.) However, there is no explanation in the AVRCIS of how occurrence data was vetted for species that can be observed in habitat that is not considered suitable (i.e., migration versus breeding habitat). Examples of species requiring explanation include the willow flycatcher and Swainsons hawk.
- AVRCIS Section 3, which describes the methodology and depicts areas of high conservation value, is not based on best available scientific information because the analysis does not include project-level data that is publicly available, including the

data identified above for Centennial and the State Route 138 expansion, nor does it include data derived from the planning-level analysis of the AVAP.

- AVRCIS Appendices F (Focal Species Habitat Models) and G (Modeling Methodology) suffer from similar infirmity as a result of the AVRCIS failing to use data from project-level environmental documents for Centennial and the State Route 138 widening and the planning-level analysis from the AVAP.

To its credit, the AVRCIS recognizes there are deficiencies and gaps in the modeling. (*See* AVRCIS at p. 2-36.) However, in the case of the data for the Centennial Specific Plan, the State Route 138 project and the AVAP, noted above, the omission of this information appears to be intentional. For example, at the June 15, 2016 meeting of the DMCA governing board (which is the public agency sponsor of the AVRCIS), a staff report notes that a privately funded “regional conservation framework” known as the Antelope Valley Conservation Framework (or “AVRCF”, which appears to be an early version of the AVRCIS) was in the process of being planned and prepared by Conservation Strategy Group, ICF, Conservation Biology Institute and Terry Watt Consulting. (Attachment 3, June 15, 2016 DMCA Staff Reports.) With respect to this early version of the AVRCIS, the DMCA staff report notes “very little new data will need to be collected or generated, with perhaps the exception of a number of additional species models.” (*Id.* at p. 3.) This statement made by DMCA staff is alarming. At the time, several of the entities preparing this early version of the AVRCIS had specific knowledge of the project-level approvals identified above, either because some of the preparers were litigants against the projects described above<sup>6</sup> or because some of the preparers owed fiduciary duties to parties that would benefit from the projects.<sup>7</sup> Thus, it would be expected that information related to the Centennial Specific Plan, the State Route 138 widening and the AVAP would be used instead of the less-specific modeling data described in the June 15, 2016 staff report. Yet, project-level data was not considered in the draft modeling.

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<sup>6</sup> The Center for Biological Diversity participated in preparing the AVRCIS (*see* AVRCIS at pp. 6-2 – 6-3) and unsuccessfully sued Los Angeles County to challenge its approval of the AVAP. Presently CBD and the California Native Plant Society (also a participant in preparing the AVRCIS, *see* AVRCIS at p. 6-3 and *see also* June 2017 Administrative Draft AVRCIS at p. 6-4) are challenging Los Angeles County’s approval of the Centennial Specific Plan. CBD and CNPS also misused the June 2017 Administrative Draft AVRCIS to negatively comment on the Centennial Specific Plan’s EIR. The Endangered Habitats League participated in preparing the AVRCIS (*see* June 2017 Administrative Draft AVRCIS at p. 6-3) and challenged the State Route 183 widening. The involvement of litigants of projects within the AVRCIS study in the AVRCIS process is just one example of a process tinged with conflicts of interest. As reflected above, that is especially the case where these litigant/AVRCIS participants then use the AVRCIS in the litigation they file.

<sup>7</sup> The Sierra Club, Audubon California, the Natural Resources Defense Council and the Endangered Habitats League are parties to the Ranchwide Agreement, and each had representatives that participated in preparing the AVRCIS. *See* June 2017 Administrative Draft AVRCIS at pp. 6-2 – 6-4. Several of the individuals representing these organizations were, or are currently, Board members of the Tejon Ranch Conservancy and owe fiduciary duties to that organization. Several of the primary leaders of the AVRCIS process are either current or past board members of the Tejon Ranch Conservancy. For instance, Terry Watt, who was a primary author and consultant of the AVRCIS until she “resigned” from the process (due to the objection by Tejon Ranch that she had conflicts of interest and her involvement was contrary to her fiduciary duties as a Conservancy director), is identified in the June 2017 Administrative Draft AVRCIS as a lead consultant and member of the Steering Committee. *See* June 2017 Administrative Draft AVRCIS at pp. 6-1 and 6-2. Likewise, Graham Chisholm, who is a signatory to the Ranchwide Agreement and a former Tejon Ranch Conservancy director, is leading preparation of the AVRCIS and its processing through DFW. *See* AVRCIS at p. 6-2.

Failure to use more recent, more refined and publicly available project-level data (and planning-level data as to the AVAP) is not excusable given the statutory mandate contained in Section 1852(b)(14) that an RCIS “shall include . . . best available scientific information regarding the strategy area and the surrounding ecoregion.” Inclusion of such data is not discretionary, it is mandatory. Here, not only is use of the project level data for the Centennial Specific Plan and the CalTrans State Route 138 expansion required (as is the planning level data for the AVAP), but failure to do so renders DFW unable to approve the AVRCIS. Doing so would be contrary to law and an abuse of discretion by DFW.

The simplest solution, therefore, is for Tejon Ranch lands to be removed from the AVRCIS’s scientific modeling. Removal from both the study area and the scientific modeling is what Tejon Ranch representatives were led to believe would occur and would be consistent with express promises made by those preparing the AVRCIS. *See Attachment 2.* Removal would also be consistent with the reasoning for omitting Tejon Ranch lands from the AVRCIS study area (which reasoning is explained above). Statements by those preparing the AVRCIS that doing so is too “costly” is, frankly, irrelevant given the statutory mandate requiring inclusion of project-level data as “best available scientific information.” Removal from the modeling to match the study area is likely less costly than revising the AVRCIS to account for this project-level and/or planning-level data.

### **III. Those Preparing the AVRCIS Failed to Comply with Applicable Law and the 2018 Guidelines**

To date, the AVRCIS process has been run almost entirely by private entities and conflicted individuals, not by a public agency that maintains responsibility for and control of the study. (*See AVRCIS, Appendix C, at pp. C-2 – C-4.*) Yet, Section 1852(a) only identifies two types of entities that are authorized to prepare and propose an RCIS – DFW or a public agency.

#### **A. The RCIS Statute Only Authorizes Public Agencies to Prepare an RCIS.**

Only the DFW or a public agency has statutory authority to “propose”, “develop”, “create” or “submit” an RCIS for DFW’s consideration. (§§ 1852(a), 1854(c).) The statute does not authorize a private party to prepare an RCIS (at least not without a public agency being “in control” of or “responsible” for the process).<sup>8</sup> Nor does the RCIS Statute contemplate, let alone authorize, the preparation of an RCIS by private parties who, at some later date and time, then “forum shop” an RCIS to a public agency that then enters the process to merely serve as the titular public agency

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<sup>8</sup> The 2018 Guidelines provide some elaboration on who may be an “RCA or RCIS proponent”, which these guidelines define to include a “public agency or group of public agencies developing an RCA or RICS for review and approval by CDFW and who is responsible for the technical and administrative updates of an RCA or RCIS.” 2018 Guidelines at p. 2-11, *emph. supp.* Additionally, the 2018 Guidelines acknowledge that an RCIS proponent (i.e., a public agency) can “prepare an RCIS collaboratively with other public agencies or other stakeholders, including non-profit organizations or other interested parties.” *See* 2018 Guidelines at 4-43. While this language does permit third parties to participate in the development of an RCIS, to comply with and not violate the RCIS Statute, such participation must be (as the 2018 Guidelines state) “collaborative” and maintain the public agencies ultimate responsibility for the process and documentation prepared. As reflected in this comment letter (which provides DMCA documents as support), the AVRCIS process not only started prior to DMCA’s involvement, but was well underway as to planning and preparation of a draft document prior to that time. The record fails to show that DMCA “initiated” the process, “led” the process or “prepared” the AVRCIS.

sponsor. Such a charade not only contradicts the RCIS Statute, but such dishonest maneuvering runs afoul of, if not is a blatant affront to, basic principles of governmental transparency, open record keeping, conflicts of interest and due process that apply to public agency operations.

As discussed below, the AVRCIS process did not involve the required public agency sponsorship until September 13, 2017 – at which time DMCA’s governing body acted, for the first time, to officially become the “public agency” proponent of the AVRCIS. (See Attachment 4, September 13, 2017 Staff Report.) Prior to this September 13, 2017 meeting, the DMCA governing board only received two briefings on the AVRCF, the early version of the AVRCIS. At no time did the DMCA governing board, prior to September 13, 2017, take any action that could remotely be viewed as authorizing the initiation, sponsorship, creation or preparation of the AVRCIS. As reflected below, prior to September 13, 2017, the DMCA was “invited” to participate in an already formed “Steering Committee” that, with authorship of private individuals and entities, and with funding from private sources, was already well underway in planning and preparing an early version of the AVRCIS. As quoted below, one of the two DMCA staff reports from June 15, 2016 makes it clear that DMCA’s role would have little influence, given major work and conclusions regarding the study’s modeling were already complete. (See Attachment 3.) The September 13, 2017 DMCA staff report is even more clear as to the timing and nature of DMCA’s involvement: (i) private consultants without any governmental oversight “produced all of the draft documentation and mapping to date and has run Steering Committee and Advisory Committee meetings” and (ii) prior DMCA discussion in June of 2016 was not to take action to be the proponent of the AVRCIS, rather it was “a discussion item about the evolving Antelope Valley Regional Conservation Investment Framework.” (See Attachment 4, *emph. supp.*)

1. The AVRCIS Process Has Been Led Almost Entirely by Private Entities and Conflicted Individuals, Not a Public Agency.

Prior to a September 13, 2017 meeting of DMCA’s governing board, there was no official action by DMCA to authorize preparation or initiation of the AVRCIS process. This is evident from the staff report for the September 13, 2017 DMCA meeting. Additionally, records from DMCA meetings prior to that date demonstrate that the AVRCIS process began well before DMCA’s involvement. One of the staff reports prepared in conjunction with the June 15, 2016 DMCA governing board meeting indicates that DMCA did not “initiate” the process but, rather, was “invited to be on the AVRCF steering committee” preparing the AVRCF, a precursor and early version of the AVRCIS. (See Attachment 3.)

The “Steering Committee” mentioned in the two June 15, 2016 staff reports was comprised of numerous entities and individuals that used the AVRCIS process for their own individual interests, not the public’s interest (which is the statutory rationale for having a public agency initiate and prepare an RCIS). The conflicts of interest of the AVRCIS Steering Committee, Advisory Committee and Technical Subcommittee membership was previously communicated to DMCA and DFW. These concerns are now reiterated by attachment of Tejon Ranch’s May 21, 2019 letter (which letter is incorporated by this reference for DMCA’s response and DFW’s consideration). (See Attachment 5, May 21, 2019 Tejon Ranch letter to DFW re conflicts.) At the very least, and to prevent further violation of public ethics and conflict of interest laws, those individuals with conflicts of interest in the outcome of the AVRCIS (including, without limitation, those individuals identified in footnotes 6 and 7) must not participate further in the AVRCIS process in any manner,

including as members of the Steering Committee, Advisory Committee or Technical Subcommittee.<sup>9</sup>

Since September 13, 2017, when the DMCA officially determined it would prepare and sponsor the AVRCIS, there has been virtually no official action or public process undertaken by DMCA in furtherance of the AVRCIS process. Records demonstrate the AVRCIS process was – and continues to be – run almost entirely by private consultants and entities (with funding from private entities) that have no contractual obligation to DMCA. This means that DMCA cannot really be deemed to be the entity preparing or initiating the AVRCIS. These facts are evidenced by the public agenda and agenda material from the DMCA meetings between 2016 and 2019<sup>10</sup> and the audio recording of the September 13, 2017 DMCA governing board meeting.

Preparation of the AVRCIS by private entities and individuals without the meaningful oversight or control of a public agency is not what the RCIS Statute contemplates (or allows). Yet, as reflected in statements by Mr. Edelman, an executive officer of DMCA (who himself was involved in the AVRCIS process), that is exactly what the private entities and conflicted individuals who prepared the AVRCIS desired. The result was a process that lacked transparency, accountability and the real opportunity for the public, property owners and other stakeholders to have input, contrary to the intent of the RCIS Statute.

During the September 13, 2017 governing board meeting, staff for DMCA stated that (a) the AVRCIS process to that date had been purely private in nature and (b) it was the intention of those actually preparing the AVRCIS to avoid public scrutiny of their work product until it was submitted to DFW. A copy of the audio recording of the September 13, 2017 DMCA governing board meeting, which was provided by DMCA to Tejon Ranch in response to a Public Records Act request, is included as Attachment 6 to this letter. Statements made at the September 13, 2017 meeting demonstrate an intentional desire to sugarcoat a public process and maintain secrecy:

Mr. Edelman: “It’s really a decision of . . . Well, I guess it’s ultimately . . . If the DMCA sponsors the regional conservation investment strategy, the DMCA will have some say in that. But right now, it’s a private document that’s moving forward through this planning team hired by Bechtel and the Windward Foundation.” (Minute 21:58, emph. supp.)

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<sup>9</sup> Tejon Ranch presumes that several of the individuals or entities listed in Chapter 6 of the AVRCIS will comment on the AVRCIS. This will only serve to highlight Tejon Ranch’s concern that conflicts of interest have and continue to permeate the AVRCIS process. Insofar as Steering Committee, Advisory Committee or Technical Advisory Committee members or their organizations comment on the AVRCIS, it is wholly inappropriate for these individuals and entities to provide input into any “response” to their own comments. It is also inappropriate for such individuals or entities to assist in responding to the comments contained in this letter.

<sup>10</sup> The DMCA governing board did not meet at all in 2015 and only met twice in 2016 – on June 15, 2016 and on September 9, 2016. (See [http://dmca.ca.gov/agenda\\_archive.asp](http://dmca.ca.gov/agenda_archive.asp) [agenda and agenda material hyperlinks].) Furthermore, neither of the meetings held in 2016 by the DMCA governing board created a “DMCA Steering Committee” or took any action to authorize or “initiate” preparation of the AVRCIS. In fact, the two staff reports for the June 15, 2016 meeting are both admissions that an early version of the AVRCIS was already in the process of being planned and prepared by private individuals and entities. See Attachment 3. DMCA’s governing board met only once in 2017, did not meet at all in 2018 and met only once in 2019 ([http://dmca.ca.gov/agenda\\_archive.asp](http://dmca.ca.gov/agenda_archive.asp)). At some point one must question whether the private individuals and entities preparing the AVRCIS (including those with conflicts of interest) intentionally chose to use a nominal government agency that hardly ever meets. Doing so certainly makes public input with decisionmakers virtually impossible.

Unknown Speaker: “And part of the process around the work that we're doing is having a team of advisors from different nonprofits and conservation entities, and to take it entirely out of their hands by letting every landowner opt in or opt out I think would be difficult to do without including these nonprofits and organizations to weigh in on how we exclude or include land, when the main goal is to the conservation priorities not landowner priorities. (Minute 22:22, emph. supp.)

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Mr. Edelman: “And this process has been going on for a year and a half, and the staff has been involved in it, and Chair Olesh is involved in it through the Transition Habitat Conservancy. . . . It [the AVRCIS] even got going *before* the legislation occurred.” (Minute 32:08, emph. supp.)<sup>11</sup>

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Mr. Edelman: “So, our recommendation is after this discussion is to take that role [to become the proponent], and go with the momentum of the program, and show the flag, and become authorized, becoming a sponsor, and potentially one thing we talked about internally was that if . . . Since you haven't seen the final draft of it, and that the people who are preparing it don't want that final draft to go public until it goes to the Department of Fish and Wildlife, that you could make it so that the chair could get final approval of it, potentially to... Before it gets submitted to Fish and Wildlife. . . . But that the planning team really thought it would be better, and move the process along farther, if it could go to that stage without being widely distributed public wide.” (Minute 34:40, emph. supp.)

What is evident from the AVRCIS process, as reflected above in statements of DMCA's own executive staff, is the intentional failure of those preparing the AVRCIS to comply with several requirements in the RCIS Statute that are intended to provide a transparent process. What is also obvious is (i) that September 13, 2017 was the first time that the DMCA's governing body actually considered and discussed its formal involvement in the AVRCIS process and (ii) prior to that time, private entities and conflicted individuals, and not DMCA as the “public agency” proponent, had been conducting all work and making all decisions relative to the AVRCIS.

Further, it is evident (as demonstrated by the quotations above) that DMCA staff urged the DMCA governing board to continue shielding the AVRCIS from public light by (i) not reviewing a final draft before submittal to DFW and (ii) authorizing the DMCA Chair, who himself had personal conflicts as a director of one of the private entities preparing the AVRCIS, to give final approval of any submittal to DFW. This suggestion was ultimately what the DMCA governing board approved, thus carrying on its legacy of inaction and inattention to the AVRCIS, which continues to this day to be controlled by private individuals and entities.

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<sup>11</sup> This is yet another example of conflicts of interest that are inherent in the AVRCIS process. Mr. Olesh is a public official (and is the Chair of DMCA's governing board). Yet in this case, DMCA's staff admits that Mr. Olesh has participated in the AVRCIS process in his private capacity as a director of the Transition Habitats Conservancy. “Wearing two hats” is a classic conflict of interest. While Mr. Olesh is unable to correct any past actions, going forward it is inappropriate for him to continue participating in the AVRCIS process.

2. The AVRCIS Was Not “Initiated” by DMCA and DMCA Was Not Involved Until Long After the AVRCIS Was Drafted.

The AVRCIS makes several factual statements that would lead DFW to believe that the document has been initiated, prepared and proposed by a public agency in compliance with Sections 1852(a) and 1854(c). For example, the AVRCIS states:

- “The Antelope Valley RCIS development process began in March 2016. The process was initiated by the Desert and Mountain Conservation Authority (DMCA) in collaboration with the California Energy Commission.” (See AVRCIS at p. 1-6, *emph. supp.*)
- “As the RCIS applicant, DMCA led preparation of this RCIS with generous funding from the Stephen D. Bechtel, Jr. Foundation.” (*Id.* at 1-7, *emph. supp.*)
- “The coordination and development of this Antelope Valley RCIS was guided by a Steering Committee. The Steering Committee, led by DMCA, was composed of representatives from DMCA, the Nature Conservancy, California Department of Transportation, California Energy Commission, U.S. Fish and Wildlife Service (USFWS), and Transition Habitat Conservancy.” (*Ibid.*, *emph. supp.*)
- “[T]he effort is being led by a Steering Committee, convened by the Desert and Mountains Conservation Authority, and comprised of . . .” (*Id.* at Appendix C-1 [Notice of Public Meeting on the Proposed Antelope Valley Regional Conservation Investment Strategy], *emph. supp.*)

None of these statements are accurate. Audio recordings of the September 13, 2017 DMCA governing board meeting (which are quoted above) make that abundantly clear. (See, Attachment 6 and quotations above.) Additionally, both DMCA staff reports, dated June 15, 2016, relating to DMCA involvement in the AVRCF (the early version of the AVRCIS) note that private entities and individuals, with private funding support, had organized a group to prepare the AVRCF document and that DMCA was being “invited” to participate in a process that was already underway. (See Attachment 3.) One of these staff reports goes on to indicate that “Staff will know a lot more about the potential DMCA roles and timing after the June 13<sup>th</sup> meeting.” (*Ibid.*) The remainder of this staff report consists of a consultant-prepared summary of the AVRCF. The two staff reports for June 15, 2016 and the consultant-prepared summary indicate that planning and preliminary preparation of the AVRCF was already underway – obviously long before DMCA’s governing board considered on June 15, 2016 whether to even participate in the precursor to the RCIS pilot program. This was also nearly 18 months before the September 13, 2017 DMCA meeting where, for the first time, DMCA’s governing board determined it would become the public agency that is supposed to prepare an RCIS as provided in Section 1852(a) and 1854(c).

These facts demonstrate that DMCA was “invited” into a process that was not only well underway, but had already (i) resulted in the planning and decision to prepare an early version of the AVRCIS and (ii) made conclusions on the nature of the scientific modeling that would be used. In sum, DMCA’s role has been minimal, lacking in oversight of those preparing the AVRCIS, and devoid of independent review of the work product prepared by the private individuals and entities submitting the AVRCIS. In fact, in taking the only and last recorded action on the AVRCIS, the DMCA Board moved to become the public agency applicant and authorized the body’s chair (who also happened to be participating in the AVRCIS process in his personal capacity as a member of

the Transition Habitat Conservancy, *see* footnotes 10 and 11 above) to conduct any necessary final review and sign off for submittal to DFW because “the people who are preparing it don’t want that final draft to go public.” (*See Attachment 6*, at min. 34:40.) It is evident that DMCA’s Board was not interested in engaging in any meaningful control or oversight of the AVRCIS process, mainly because (to date) it has been driven by private entities and individuals.

For the reasons in Section III.A, it is improper for DFW to take any action to approve the AVRCIS. Action by DFW to approve the AVRCIS would do nothing more than condone a secretive process.

**B. Those Preparing the AVRCIS Have Not Complied with Provisions of the RCIS Statute Meant to Ensure Public Participation.**

In order for there to be sufficient public input, at a minimum, there must be compliance with provisions of the RCIS Statute that are designed to afford the public and interested parties the opportunity to participate.

The RCIS Statute requires that, unless a public agency initiated an RCIS before January 1, 2017, the public agency must publish a notice of intent to create an RCIS and file such notice with the Office of Planning and Research and the county clerk of counties where the RCIS is found. (§ 1854(c)(1); *see also* Gov. Code § 6040 [specifying method of publication applicable to all public agency publication obligations].) The AVRCIS concedes that the DMCA did not publish a notice of intent “[b]ecause development of this Antelope Valley RCIS began in June 2016.” (*See AVRCIS* at p. 1-15.) While it is true that there were entities preparing what later became the AVRCIS prior to January 1, 2017, those entities were private organizations and conflicted individuals who were not authorized, directed or approved by DMCA’s governing board to do so. Even the June 15, 2016 action by DMCA does not render the AVRCIS’s statement accurate because, as noted in the June 15, 2016 staff reports, at that time a private group was already in the process of planning and preparing the AVRCF (an early version of the AVRCIS). Indeed, it was this private group that was “inviting” DMCA in June of 2016 to sit on a steering committee as one member among many other participants. It was only on September 13, 2017, at the end of this closed group process that DMCA’s governing board took official action to become the public agency sponsor of the AVRCIS.

This notice of intent is required by the RCIS Statute. It was not published by DMCA or those actually preparing the AVRCIS. As a result, the AVRCIS may not move forward absent compliance with this requirement.

**C. Those Preparing the AVRCIS Have Not Complied with the 2018 Guidelines.**

DFW promulgated the 2018 Guidelines to provide guidance to public agencies preparing RCIS. There have been several prior iterations of DFW guidance, including guidelines published in June of 2017. The 2018 Guidelines govern an RCIS if it was initiated on or after January 1, 2017 or if a public agency published a notice of intent for an RCIS after September 13, 2018. (*See Guidelines* at p. 4-1, fn. 117.) An RCIS initiated prior to January 1, 2017 is exempt from the Guidelines (as would be an RCIS for which a public agency published a notice of intent prior to September 14, 2018), in which case the RCIS may use DFW guidelines adopted in June of 2017.

In order to avail itself of the June 2017 guidelines, a public agency “must provide CDFW with adequate written documentation that they have met either one of the criteria.” In this case, DMCA is unable to provide the written documentation that is required by the 2018 Guidelines. As discussed above, all action taken by DMCA relative to the AVRCIS occurred exclusively at the June 15, 2016 and September 13, 2017 governing board meetings. As part of the June 15, 2016 meeting documentation, the staff reports demonstrate that DMCA did not initiate the AVRCIS process (or AVRCF process, for that matter) – private entities and conflicted individuals initiated the process and were already underway planning and preparing the draft study. It was only at the September 13, 2017 DMCA governing board meeting that DMCA, for the first time, took official action to become the “public agency” proponent of the AVRCIS. Accordingly, the 2018 Guidelines – not earlier DFW guidance – are applicable to the AVRCIS.

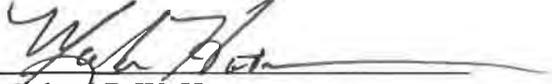
The AVRCIS proponents fail to comply with provisions in Section 4.2.4 of the 2018 Guidelines. The record does not indicate any outreach by AVRCIS proponents to “tribes with cultural interests in the RCIS area,” as is recommended in the 2018 Guidelines. (See Guidelines at p. 4-6.) This omission also contradicts the DFW’s adopted Tribal Communication and Consultation Policy. (See Department Bulletin 2014-07.) Oddly, the various committees that comprised the AVRCIS’s “decisionmakers,” which were mainly environmental organizations, individuals from government agencies and public utilities, could have easily communicated with and included the cultural perspective of other communities and valued stakeholders, such Native American tribes. Unfortunately, AVRCIS preparers appear not to have conducted this important consultation and good faith outreach.

#### IV. Conclusion

Tejon Ranch lands should be removed from the AVRCIS’s scientific modeling, as those preparing the AVRCIS indicated would occur and as Tejon Ranch representatives were led to believe would happen. Removal from the modeling is consistent with the reasoning for removing Tejon Ranch lands from the AVRCIS study area. The cost of doing so is irrelevant given the statutory mandates that require inclusion of project-level data as “best available scientific information”. If the AVRCIS’s preparers will not remove Tejon Ranch lands from the modeling (as previously promised), then the scientific modeling must be re-run because it does not include the best available scientific information, which as demonstrated by this letter is contained in publicly-available project level environmental documentation.

Regardless of the points above, the AVRCIS’s preparers failed to comply with various aspects of the RCIS Statute, including most notably, the failure of a public agency to initiate the AVRCIS and to publish a notice of intent. These infirmities are highly problematic because DMCA is unable to demonstrate its compliance with the RCIS Statute and the 2018 Guidelines. As a result, it is difficult for DFW to approve the AVRCIS.

Sincerely,

  
Michael R.W. Houston,  
Senior Vice President, General Counsel & Secretary

- Attachments:
1. May 1, 2008 Letter supporting the Ranchwide Agreement
  2. Email excerpts regarding removal of Tejon Ranch lands
  3. June 15, 2016 DMCA Staff Reports regarding AVRCF (two staff reports)
  4. September 13, 2017 DMCA Staff Report regarding AVRCIS
  5. May 21, 2019 Letter from Tejon Ranch to DFW re conflicts (with attachments)
  6. Audio recording of September 13, 2017 DMCA meeting (Thumb-drive)

cc: Nathan Voegeli, Esq., DFW Tribal Liaison (*via email, nathan.voegeli@wildlife.ca.gov*)  
Tejon Ranch Conservancy Board of Directors (*via email by way of Conservancy counsel*)  
Graham Chisholm (*via email*)

*Note: Audio file appended as Attachment 6 only sent to primary recipients*

**Attachment 1**

May 1, 2008 Letter supporting the Ranchwide Agreement

EXHIBIT R

Resource Agency Letter re Mitigation



*California Environmental  
Protection Agency*



May 1, 2008

Mr. Robert A. Stine  
President & CEO  
Tejon Ranch Company  
4436 Lebec Road  
Lebec, CA 93243

Dear Mr. Stine:

As you know, representatives of the Tejon Ranch Company (TRC) have had a number of meetings with California Resources Agency staff to discuss TRC's long-term plans for conservation and development of the 270,000-acre Tejon Ranch (Ranch). TRC has also met with the California Environmental Protection Agency to discuss the outline of TRC's project plans. Because of the exceptional natural resource values of the Ranch, both of our agencies have been delighted to learn that you have worked with various environmental groups (Resource Groups) to develop a conservation and land use agreement (Ranchwide Agreement) that identifies and designates planned conservation areas (Conserved Areas), planned development areas (Developed Areas) and the permitted activities within those areas. As it has been described to us, the Ranchwide Agreement would foster the orderly conservation and development of the Ranch and provide for the permanent conservation of almost 90 percent of the Ranch. We understand that the Ranchwide Agreement is at a conceptual level at this time, but that you expect to have final agreement with environmental groups sometime in early May.

In connection with the proposed Ranchwide Agreement, we understand that TRC is seeking policy level recognition of this historic accord from State and Federal agencies and departments. The purpose of this letter is to provide that policy recognition exclusively in relation to this planned transaction for the Ranch.

Because of the unique factors involved in this project, this policy recognition is not intended to, and does not, serve as precedent for lands other than those within the Ranch.

To that end, we offer the following policy statements in support of the Ranchwide Agreement:

Mr. Robert A. Stine  
May 1, 2008  
Page 2

- Based on your description of the Ranchwide Agreement, we understand that of the approximately 270,000 acres comprising the Ranch, the Ranchwide Agreement would provide for the permanent preservation of at least 178,000 acres and for the option to preserve an additional 62,000 acres through the purchase of conservation easements, or potentially fee title, for an anticipated total of approximately 240,000 acres, or almost 90 percent of the total Ranch acreage. Because of the many unique factors noted above, including the sheer magnitude of this conservation effort and the significant resource values attributed to this property, and in viewing the 240,000 acres in the Conserved Areas in a holistic manner, we expect that TRC will be allowed to use those Conserved Areas and corresponding natural resource values associated with these Conserved Areas to meet the land conservation and corresponding natural resource mitigation requirements for and the planned development and other activities within the Developed Areas, including the designated planned development projects of Tejon Mountain Village, Centennial and Grapevine, subject to potential limitations for Conserved Areas acquired using public funds as described below.
- Though actual mitigation requirements for the planned development and other activities within the Developed Areas cannot be known prior to regulatory review, given the large amount and high natural resource values in these Conserved Areas, we do not anticipate that TRC would be required to acquire or use lands outside of Ranch property to satisfy natural resource mitigation requirements. Only after a full evaluation of these lands, and a determination is made that the required mitigation can not be found on the Ranch, would we look outside the Ranch for mitigation.
- For portions of the Conserved Areas that are permanently preserved by conservation easements, or potentially fee title, acquired using public funds, the use of these lands for mitigation purposes would not be allowed unless the potential mitigation use of these lands is taken into account in the price paid and unless mitigation uses are allowed by applicable laws including those governing the public funding source(s) used to fund the acquisition.
- In order to provide an integrated and comprehensive approach to the management of lands and resources within the Conserved Areas, we understand that the parties have agreed to create an independent conservancy (Tejon Conservancy) as part of the Ranchwide Agreement. Provided that the Tejon Conservancy meets applicable legal requirements for holding mitigation land and conservation easements and assuming corresponding long-term mitigation monitoring and other mitigation obligations, the Tejon Conservancy could serve as the appropriate and preferred entity to hold conservation easements and/or title to mitigation lands granted by TRC, and to manage those lands, subject to regulatory requirements imposed pursuant to project permitting for the Developed Areas.

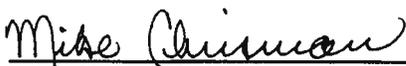
Mr. Robert A. Stine  
May 1, 2008  
Page 3

- We appreciate the commitment of TRC and the Resource Groups to work with California State Parks and other stakeholders toward creation of a State Park within the Ranch. A large park, extending from the Mojave Desert, across the Tehachapi Mountains, and into the grasslands of Tejon Valley, would be an extraordinary addition to California's state park system, providing meaningful public access to the Tehachapi Mountains. The Tejon Conservancy would be a valued partner in planning and supporting this State Park.

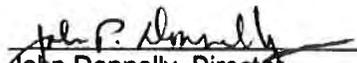
This letter is intended to set forth policy statements in support of the Ranchwide Agreement. As specific projects are proposed, TRC and other parties engaged in the planned development or other activities on the Ranch will be required to apply for and obtain all permits, licenses and approvals required under applicable law, including compliance with the California Environmental Quality Act and all other state laws. Final determinations regarding permit and mitigation requirements for those activities will be decided by the appropriate agencies and departments as part of, and in accordance with, those processes.

The policy statements in this letter presume that the terms of the final Ranchwide Agreement are substantially consistent with the above description and will in fact be reached. If, for some reason, TRC and the environmental groups are unable to reach a final agreement, we expect that TRC will notify us. Again, we applaud the Tejon Ranch Company for working to reach such a significant and historic agreement to address the long-term future of Tejon Ranch.

Sincerely,

  
Mike Chrisman, Secretary for Resources

  
Ruth Coleman, Director  
California State Park

  
John Donnelly, Director  
Wildlife Conservation Board

  
Don Koch, Director  
Department of Fish and Game

  
Linda Adams, Secretary for  
Environmental Protection

  
Tam Doduc, Chair, State Water  
Resources Control Board

**Attachment 2**

Email excerpts regarding removal of Tejon Ranch lands

**From:** Graham Chisholm <[graham.chisholm@gmail.com](mailto:graham.chisholm@gmail.com)>  
**Sent:** Tuesday, August 20, 2019 3:28 PM  
**To:** Greg Medeiros <[gmedeiros@tejonranch.com](mailto:gmedeiros@tejonranch.com)>  
**Cc:** Hunt Gary <[ghunt@calstrat.com](mailto:ghunt@calstrat.com)>; Michael Houston <[mhouston@tejonranch.com](mailto:mhouston@tejonranch.com)>  
**Subject:** [External] Re: Fwd: AVRCIS

Greg, I double checked dates, and wanted to clarify that I mean Thursday, Oct. 10th (not the 11th).

Thanks. Graham

On Wed, Aug 14, 2019 at 8:55 AM Graham Chisholm <[graham.chisholm@gmail.com](mailto:graham.chisholm@gmail.com)> wrote:

Greg, thanks for the follow up. We would propose October 11th (Thursday). Scott Fluery (ICF) is the only one of us based in southern California and at this point we'd propose that we either meet in person in Sacramento/San Francisco or convene a call with web access to carefully go over maps that will indicate how we will have addressed the concerns that have been raised about the display of model results. Obviously in person is preferable.

Due to the prior experience, we will not be circulating a copy of the revised draft to any stakeholders prior to resubmission, but are happy to walk through in specific detail the issues the Tejon Ranch Company has raised.

Thanks. Graham

On Tue, Aug 6, 2019 at 5:38 PM Greg Medeiros <[gmedeiros@tejonranch.com](mailto:gmedeiros@tejonranch.com)> wrote:

Hello Graham,

Thank you for the follow up email. The dates you propose are fine with my schedule. However, I would prefer to move the meeting to the Los Angeles area. Also, to make the meeting as productive and efficient as possible. I would like a copy of the draft AVRCIS Report for my review prior to the meeting. Do you have a preferred date during the week of October 7?

Greg

Greg Medeiros

*Vice President of Community Development - Centennial*



27220 Turnberry Lane, Suite 190

Valencia, CA 91355

(661) 705-4460 Direct

[www.TejonRanch.com](http://www.TejonRanch.com)

**From:** Graham Chisholm <[graham.chisholm@gmail.com](mailto:graham.chisholm@gmail.com)>  
**Sent:** Tuesday, August 6, 2019 5:27 PM  
**To:** Hunt Gary <[ghunt@calstrat.com](mailto:ghunt@calstrat.com)>; Michael Houston <[mhouston@tejonranch.com](mailto:mhouston@tejonranch.com)>; Greg Medeiros <[gmedeiros@tejonranch.com](mailto:gmedeiros@tejonranch.com)>  
**Subject:** [External] Fwd: AVRCIS

Greg, Gary and Michael, confirming that you received my email regarding getting together to review how the draft was reviewed prior to our next submission. Thanks. Graham

----- Forwarded message -----

**From:** Graham Chisholm <[graham.chisholm@gmail.com](mailto:graham.chisholm@gmail.com)>  
**Date:** Tue, Jul 30, 2019 at 11:57 AM  
**Subject:** Re: AVRCIS  
**To:** Greg Medeiros <[gmedeiros@tejonranch.com](mailto:gmedeiros@tejonranch.com)>  
**Cc:** Paul Edelman <[edelman@smmc.ca.gov](mailto:edelman@smmc.ca.gov)>, ronald.unger@wildlife.ca.gov <[ronald.unger@wildlife.ca.gov](mailto:ronald.unger@wildlife.ca.gov)>, Beale Chris <[cbeale@resourceslawgroup.com](mailto:cbeale@resourceslawgroup.com)>, Gary Hunt <[ghunt@calstrat.com](mailto:ghunt@calstrat.com)>, Michael Houston <[mhouston@tejonranch.com](mailto:mhouston@tejonranch.com)>

Dear Greg,

Following up on my earlier email, I wanted to see if we can organize a meeting to discuss the Antelope Valley draft RCIS that is being revised. Given the challenge of schedules, I wanted to see if one of the follow dates would work for a meeting in Sacramento: Oct. 7, 10, or 11 (Mon, Thurs, Friday). The ICF team would describe the draft and share maps that will indicate how the modeling results are not extended beyond the RCIS boundary (which exclude TRC lands). Unfortunately, Chris Beale will not be able to join on those dates.

Let me know if those dates would work for you and anyone else you'd like to have join the meeting.

Thanks. Graham

On Tue, Jun 18, 2019 at 1:51 PM Graham Chisholm <[graham.chisholm@gmail.com](mailto:graham.chisholm@gmail.com)> wrote:

Dear Greg, thanks for your email, once the technical consultant completes the work and before we are prepared to resubmit, we will set up a time to do a webinar to review. Chris Beale also confirmed this with Jennifer Hernandez. I don't expect that that will occur until at least mid-August due to work flow.

Thanks. Graham

On Tue, Jun 18, 2019 at 1:48 PM Greg Medeiros <[gmedeiros@tejonranch.com](mailto:gmedeiros@tejonranch.com)> wrote:

Hello Graham,

In response to your offer to meet to confirm removal of Tejon Ranch from maps and the scientific re-modeling in the draft AVRCIS, as noted in the attached email exchange between our general counsel and you, I am writing to touch base on the status of your update and revision of the AVRCIS.

When do you think you will be in a position to share the changes to the maps and scientific re-modeling that you have offered to implement to fully remove Tejon Ranch from the AVRCIS (consistent with the removal of the Ranch from the study area)? As we understand it from your attached email, and as is our expectation, the study will be revised to update the mapping and scientific re-modeling to not have Tejon Ranch land included. I am available at a time that is convenient for both of us to discuss this and to review the updated draft.

Thank you,

Greg Medeiros

Greg Medeiros

*Vice President of Community Development - Centennial*



27220 Turnberry Lane, Suite 190

Valencia, CA 91355

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[www.TejonRanch.com](http://www.TejonRanch.com)

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Graham Chisholm

c. 510-409-6603

e. [graham.chisholm@gmail.com](mailto:graham.chisholm@gmail.com)

--

Graham Chisholm

c. 510-409-6603

e. [graham.chisholm@gmail.com](mailto:graham.chisholm@gmail.com)

**Michael Houston**

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**From:** Michael Houston  
**Sent:** Friday, May 24, 2019 10:33 AM  
**To:** Graham Chisholm  
**Cc:** Paul Edelman; ronald.unger@wildlife.ca.gov; Beale Chris; Gary Hunt  
**Subject:** RE: Letter pertaining to Antelope Valley Regional Conservation Investment Strategy  
**Attachments:** FW: Call Status; Fwd: Letter pertaining to Antelope Valley Regional Conservation Investment Strategy

Mr. Chisolm,

I think our most significant concern regarding the lack of communication to date relates to the fact that Tejon Ranch had no prior understanding of what had been done in the most recent AVRCIS submittal, given that we'd previously been told that the study area and modeling would exclude Tejon Ranch (and really should exclude all area outside the study area) and for all the reasons raised in my prior letters. As reflected in Gary Hunt and Jennifer's responses (both attached), our awareness occurred only after the May 7<sup>th</sup> DMCA meeting and both have no record of being contacted.

Having said that, I appreciate your willingness to implement changes that are consistent with the fact that Tejon Ranch is outside the study area, as noted in your email below. Since you've offered, it probably would be appropriate at some point for us to evaluate the changes to modeling in depictions or narrative to ensure that your commitments are being lived up to.

Of course, we reserve all our rights and remain concerned about the AVRCIS process in general.

Thank you,  
Mike

Michael R.W. Houston  
*Senior Vice President and General Counsel*



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Tejon Ranch, CA 93243  
(661) 663-4230 Direct  
[www.TejonRanch.com](http://www.TejonRanch.com)  
[www.TejonOutlets.com](http://www.TejonOutlets.com)  
Bio: <http://tejonranch.com/company-executives/senior-vice-president-general-counsel/>



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**From:** Graham Chisholm <graham.chisholm@gmail.com>  
**Sent:** Wednesday, May 22, 2019 10:50 AM  
**To:** Michael Houston <mhouston@tejonranch.com>  
**Cc:** Paul Edelman <edelman@smmc.ca.gov>; ronald.unger@wildlife.ca.gov; Beale Chris <cbeale@resourceslawgroup.com>; Gary Hunt <ghunt@calstrat.com>  
**Subject:** Re: Letter pertaining to Antelope Valley Regional Conservation Investment Strategy

Mr. Houston,

Thanks for your response, I will discuss with those involved in preparing the next revised draft.

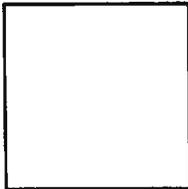
To correct and update your message indicating the lack of response, please note that I did not reach out to Mr. Hunt, please see my email on May 14th (below). I would have to go through phone records to find the date/time when I left Mr. Hunt a message seeking to discuss the Antelope Valley RCIS earlier this year. Further, Chris Beale left Ms. Hernandez a voice on the afternoon of May 17, 2019 and did not receive a response as of today.

Further to my message, we'd be happy to meet with you or representatives to walk through how we intend to revise the draft, otherwise we will move forward and ensure that the depiction of the modeling results only cover the RCIS area.

Regards, Graham Chisholm

**Graham Chisholm <graham.chisholm@gmail.com>**

to Hunt



Gary, hopefully you haven't lost my number, I left you a message regarding Antelope Valley several months ago, a d never heard back.

Please let me know if you like to speak.

Thanks.

On Wed, May 22, 2019 at 10:26 AM Michael Houston <mhouston@tejonranch.com> wrote:

Mr. Chisolm and Mr. Edelman,

Initially, thank you both for the responses you provided. I've included an email that Mr. Edelman separately sent me yesterday, as an attachment to this email chain, for ease of communication. As reflected in my correspondence over the past year and a half (primarily directed to DMCA, and most recently to the Department of Fish & Wildlife), the most concerning aspect of this process has been attempting to understand what is occurring. I'll let my earlier correspondence speak for itself, in regard to what I think has been a less than clear or transparent process, but I pin that concern on the fact that nominally private entities have been managing and preparing a study that should really be undertaken through a governmental process (as statutorily required). I sincerely hope that your respective recent responses are an indication that the commitment made to us in 2017 will, in fact, be honored.

Permit me to clarify several points and raise them in a manner that is responsive to each of your comments.

1. As mentioned in my letter yesterday to Mr. Unger, we are aware that the current AVRCIS study area does not include Tejon Ranch. The concern, however, as expressed in my letter, is that the mitigation priority modeling and visualizations depicting this modeling extend beyond the study area and such depictions include Tejon Ranch and other lands outside the boundary. The letter sent to Mr. Unger included several examples from the February 2019 Draft AVRCIS that demonstrate this point (which are also attached to this email). The August – September 2017 correspondence from Mr. Beale and Mr. Chisolm and our September 2017 follow-up (all of which were noted and attached to our letter to DFW) made it clear that our expectation was not just to be removed from the formal study area, but to ensure that any graphical or textual discussion of mitigation modeling also excluded Tejon Ranch. Indeed, it makes sense to delimit the modeling to the study area, and our letters have provided several reasoned and practical reason to do so.
2. As a result, the current February 2019 Draft AVRCIS includes graphical depictions that can and should be modified so as not to extend the modeling beyond the study area. As Mr. Chisolm notes below, this is likely a “relatively easy solution” that probably involves modification to the multiple figures and depictions throughout the draft AVRCIS. I will defer to those that prepared the document as to whether any text or tables also need modification.
3. Bear in mind that we understood this issue was being resolved and it was only after we received notice of the May 7th DMCA meeting, attended that meeting, made a public records request to both DMCA and DFW, and received the February 2019 Draft AVRCIS that we thereafter learned the commitment made to us in 2017 was not entirely followed through. In that regard, and for clarity, let me correct Mr. Chisolm's comments below that (1) Jennifer Hernandez did not hear from anyone on this topic since the May 7<sup>th</sup> meeting and (2) only after Mr. Hunt reached out to others who have been involved in the AVRCIS process did Mr. Chisolm indicate on May 15th he was going to contact Mr. Hunt (which did not happen, although it bears mentioning that Mr. Hunt was out of the country for the past two weeks). At no point prior to our attending the May 7<sup>th</sup> DMCA meeting did we hear from any representatives preparing the AVRCIS before the AVRCIS's submittal to DFW in February.

I am happy to discuss further how you intend to implement the “relatively easy solution” you think can be accomplished. I do believe the solution is an easy one that involves revising the depictions so that modeling is only depicted within the AVRCIS boundary.

Sincerely,

Mike

Michael R.W. Houston

*Senior Vice President and General Counsel*



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**From:** Graham Chisholm <[graham.chisholm@gmail.com](mailto:graham.chisholm@gmail.com)>

**Sent:** Tuesday, May 21, 2019 1:27 PM

**To:** Michael Houston <[mhouston@tejonranch.com](mailto:mhouston@tejonranch.com)>; Hunt Gary <[ghunt@calstrat.com](mailto:ghunt@calstrat.com)>

**Cc:** [ronald.unger@wildlife.ca.gov](mailto:ronald.unger@wildlife.ca.gov); Beale Chris <[cbeale@resourceslawgroup.com](mailto:cbeale@resourceslawgroup.com)>; Paul Edelman

<edelman@smmc.ca.gov>

**Subject:** Re: Letter pertaining to Antelope Valley Regional Conservation Investment Strategy

Dear Mr. Houston, thank you for copying me on your letter addressed to Ron Unger. In initial review it seems like there could be a relatively easy solution to addressing the concern related to underlying modeling data that appears outside the RCIS boundary.

In the past week, we have reached out to Gary Hunt and Jennifer Hernandez without response, but we'd be happy to work with you to arrange a time to meet either in person or by phone to see if your issue of concern can be resolved.

Please let me know what would be most convenient for you.

Regards,

Graham Chisholm

On Tue, May 21, 2019 at 9:57 AM Michael Houston <mhouston@tejonranch.com> wrote:

Mr. Unger,

Please see the attached letter of today's date.

Thank you,

Michael R.W. Houston

*Senior Vice President and General Counsel*



**Michael Houston**

---

**From:** Graham Chisholm <graham@csgcalifornia.com>  
**Sent:** Monday, September 18, 2017 7:46 AM  
**To:** jennifer.hernandez@hklaw.com; ghunt@calstrat.com  
**Cc:** Michael Houston; Paul Edelman; Spencer Eldred; elemke@counsel.lacounty.gov; scoleman@counsel.lacounty.gov  
**Subject:** Tejon Ranch & the Antelope Valley RCIS

Jennifer and Gary,

This follows up on our August 14th call, on which we shared that we would be taking a recommendation to remove the Tejon Ranch from the RCIS to the RCIS steering committee and that Chris Beale would let Jennifer know the recommended action.

Chris Beale confirmed with me that he spoke with Jennifer on August 18th and let her know that the steering committee was comfortable with the recommendation to remove Tejon Ranch from the draft Antelope Valley Regional Conservation Investment Strategy (AVRCIS). ICF International is modifying the draft AVRCIS in order to implement the recommendation, including removing references to the Tejon Ranch from the draft AVRCIS' narrative analysis and maps.

When the draft AVRCIS is submitted to CDFW for review it will not include the Tejon Ranch.

Thanks and with regards,

Graham Chisholm

Cc:  
Paul Edelman  
Elain Lemke  
Starr Coleman  
Michael Houston

Attachment: ATTACHMENT B - Written Comments from the August 24, 2021 Public Hearing (SoCal Greenprint Update)

## Michael Houston

---

**From:** CBeale@resourceslawgroup.com  
**Sent:** Tuesday, August 15, 2017 1:57 PM  
**To:** Jennifer.Hernandez@hklaw.com  
**Subject:** AV RCIS study area

Jennifer, after consulting with the AV RCIS steering committee, ICF will be removing Tejon Ranch from the AV RCIS study area, as requested by Tejon Ranch.

### Chris Beale

RESOURCES LAW GROUP, LLP  
555 CAPITOL MALL, SUITE 1090  
SACRAMENTO, CA 95814  
916.442.4880  
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[cbeale@resourceslawgroup.com](mailto:cbeale@resourceslawgroup.com)  
[www.resourceslawgroup.com](http://www.resourceslawgroup.com)

This email may contain confidential or privileged information, or attorney work product. Only the intended recipient may disclose, copy, distribute, or otherwise use its contents or attachments. If you received this email in error, please contact Chris Beale immediately at the telephone number or email address above.

Attachment: ATTACHMENT B - Written Comments from the August 24, 2021 Public Hearing (SoCal Greenprint Update)

**Attachment 3**

June 15, 2016 DMCA Staff Reports regarding AVRCF (two staff reports)

# DESERT AND MOUNTAIN CONSERVATION AUTHORITY

## MEMORANDUM

**TO:** The Governing Board

**FROM:** Joseph T. Edmiston, FAICP, Hon. ASLA, Executive Officer

**DATE:** June 15, 2016

**SUBJECT:** **Agenda Item XIII: Discussion and possible action regarding the Antelope Valley Regional Conservation Framework (RCF) project and official Desert and Mountain Conservation Authority involvement.**

Staff Recommendation: That the Governing Board receive a briefing on the proposed Antelope Valley Regional Conservation Framework (RCF) project and provide any direction to staff.

Background: The California Department of Fish and Wildlife (CDFW) working with other State agencies and private groups is working on pilot projects called Regional Conservation Frameworks (RCF). This working group has determined that the Antelope Valley is an ideal location for such a project. A grant from the Windward Fund to a company called ICF has funded the preparation of an Antelope Valley Regional Conservation Framework. The study area will include most of Antelope Valley but the initial plan most likely would concentrate on the southwest corner of the valley. A Regional Conservation Assessment (RCA) will be part of the RCF.

The DMCA has been invited to be on the AVRCF steering committee that will meet for the first time on June 13<sup>th</sup>. Staff will be attending that meeting. On the June 22<sup>nd</sup> a meeting for an advisory committee will be held in Lancaster. Staff will be attending that meeting. The tentative schedule calls for the submittal of a draft RCF to CDFW in January 2017.

The DMCA is positioned to play a key role in the implementation of the RCF as an entity to hold and acquire properties and conservation easements. Staff will know a lot more about potential DMCA roles and timing after the June 13<sup>th</sup> meeting. The text on the following page was prepared by the consultants as a brief project description.

## **Antelope Valley Regional Conservation Framework Description**

The Antelope Valley Regional Conservation Framework (RCF) is part of a state-wide effort to pilot a new flexible conservation planning tool, to identify high priority conservation areas within a region that can be proactively protected, restored, and managed. These RCFs will identify wildlife, fisheries, and habitat conservation needs including conservation actions needed to address climate change and protect wildlife corridors on a regional scale. The RCFs will be an important tool to guide and coordinate public and private investments in habitat conservation, wildlife and fisheries recovery strategies, infrastructure planning and development, and compensatory mitigation for impacts to threatened and endangered species and other natural resources.

The RCFs are voluntary, non-regulatory tools that will serve a number of beneficial purposes, including support proactive conservation planning in advance of development pressures, which will help reduce potential conflicts that may arise at the individual project stage. In addition, RCFs may guide conservation investments by state, federal, local and private entities and provide a basis for the development of advance mitigation agreements.

Regional Conservation Frameworks can also be used as a foundation for future action for communities that want to develop more comprehensive plans such as Natural Community Conservation Plans (NCCPs) or regional Habitat Conservation Plans (HCPs).

With private foundation support and coordination by the Conservation Strategy Group, ICF has teamed with the Conservation Biology Institute (CBI) and Terry Watt Consulting to develop the draft Antelope Valley Regional Conservation Framework. CBI will provide support on key technical tasks including management of GIS data; providing consultant team, client, and stakeholder access to GIS information; an assessment of climate change vulnerability; and general advisory support on conservation issues in the Antelope Valley and greater West Mojave Desert. CBI will manage all relevant existing data and any new data in Data Basin, an online mapping interface that provides visual tools so that stakeholders and technical participants are able to easily interpret the data being used in the planning process. Terry Watt Consulting will lead stakeholder facilitation for the Antelope Valley RCF, with logistical support from ICF public outreach staff.

The Antelope Valley RCF will build on the data, analyses, and conservation strategies that were developed as part of the Desert Renewable Energy Conservation Plan (DRECP). This RCF will also dovetail with the stakeholder engagement that has been so important to the DRECP process. This RCF will distill the information in the DRECP for the RCF study area and create a framework that will expand the utility of that information beyond its current application for renewable energy planning. An important driver in the

Agenda Item XIII  
June 15, 2016  
Page 3

development of an RCF is the information contained in a Regional Conservation Assessment (RCA). The DRECP along with other regional assessments such as the Mojave Desert Ecoregional Assessment (TNC 2010) will provide the key information for the RCA, and will be integrated into the Antelope Valley RCF. ICF assumes that very little new data will need to be collected or generated, with perhaps the exception of a limited number of additional species models. Where possible we attempt to identify presumed gaps in data that will need to be filled. In some cases, those gaps may not be apparent until the RCF is under development.

# DESERT AND MOUNTAIN CONSERVATION AUTHORITY

## MEMORANDUM

**TO:** The Governing Board

**FROM:**  Joseph T. Edmiston, FAICP, Hon. ASLA, Executive Officer

**DATE:** June 15, 2016

**SUBJECT:** **Agenda Item XIV: Consideration of resolution authorizing: 1) an application for, and acceptance of, a Windward Fund grant for staff involvement in the Antelope Valley Regional Conservation Framework project, and 2) entering into a contract with the Mountains Recreation and Conservation Authority for staff services.**

Staff Recommendation: That the Governing Board adopt the attached resolution authorizing: 1) an application for, and acceptance of, a Windward Fund grant for staff involvement in the Antelope Valley Regional Conservation Framework project, and 2) entering into a contract with the Mountains Recreation and Conservation Authority for staff services.

Background: The California Department of Fish and Wildlife (CDFW) working with other State agencies and private groups is working on pilot projects called Regional Conservation Frameworks (RCF). This working group has determined that the Antelope Valley is an ideal location for such a project. A grant from the Windward Fund to a company called ICF has funded the preparation of an Antelope Valley Regional Conservation Framework.

The DMCA has been invited to be on the AVRCF steering committee that will meet for the first time on June 13<sup>th</sup>. On the June 22<sup>nd</sup> a meeting for an RCF advisory committee will be held in Lancaster. The tentative schedule calls for the submittal of a draft RCF to CDFW in January 2017.

The DMCA is positioned to play a key role in the implementation of the RCF as an entity to hold and acquire properties and conservation easements. Staff will know a lot more about potential DMCA roles and timing after the June 13<sup>th</sup> and 22<sup>nd</sup> meetings.

The working group desires to provide DMCA with a \$20,000 grant to fund staff involvement in the preparation of the RCF. To provide such staff services the DMCA would contract with the Mountains Recreation and Conservation Authority.

**Attachment 4**

September 13, 2017 DMCA Staff Report regarding AVRCIS

# DESERT AND MOUNTAIN CONSERVATION AUTHORITY

## MEMORANDUM

**TO:** The Governing Board

**FROM:**  Joseph T. Edmiston, FAICP, Hon. ASLA, Executive Officer

**DATE:** September 13, 2017

**SUBJECT: Agenda Item VII: Consideration of resolution authorizing public agency sponsorship and submission of an Antelope Valley Regional Conservation Investment Strategy (RCIS) to the California Department of Fish and Wildlife for review and approval.**

**Staff Recommendation:** That the Governing Board adopt the attached resolution authorizing both public agency sponsorship and submission of an Antelope Valley Regional Conservation Investment Strategy (RCIS) to the California Department of Fish and Wildlife for review and approval.

**Background:** At the Governing Board's last meeting in June 2016, there was a discussion item about the evolving Antelope Valley Regional Conservation Investment Framework. Since that time staff has been an active member of the nine entity Steering Committee for the Antelope Valley Regional Conservation Investment Strategy planning effort. The RCIS program evolved out recently approved State legislation to create comprehensive pilot conservation planning programs for specific areas in the State. The program is run through the California Department of Fish and Wildlife (CDFW). The CDFW project web home page and recently released RCIS guidelines are attached. The Antelope Valley was selected as one of the initial projects.

A private foundation has generously funded ICF Corporation to prepare the Antelope Valley RCIS. ICF has a dedicated planning team that has produced all of the draft documentation and mapping to date and has run Steering Committee and Advisory Committee meetings. The team includes experienced biologists and a GIS specialist that has worked extensively on the compilation and creation of data layers for the subject area. The ICF team has done an incredible job to date and continues to work on the project using the best available science and substantial public stakeholder input.

The planning team's goal was to submit a draft RCIS to CDFW this August. Currently, CDFW is reviewing a draft Santa Clara County RCIS. The planning team has wisely decided to wait for CDFW comments on that document to improve the efficiency of producing the first AV RCIS draft submitted to CDFW. The program requires a public agency sponsor for each RCIS. As discussed at the 2016 DMCA meeting, for a host of reasons the DMCA appears to be the best positioned agency to be the public sponsor. To avoid any delay in the progress of the Antelope Valley RCIS program, staff brings before the Governing Board the opportunity to authorize the DMCA as the public agency sponsor for the program.

To date, the RCIS Advisory and Steering committees have had multiple meetings to shape the RCIS approach and draft documents. In March the DMCA convened a publicly noticed meeting in Lancaster. Materials are on the DMCA website AND attached. In April the RCIS planning team, held a public meeting with the Association of Rural Town Councils. The planning team has incorporated over 700 comments to date. The public meeting presentation and an overview presentation of the current administrative draft are attached for background. Additional draft figures showing the project methodologies, mapping, and processes are also attached.

Once the planning team submits the first draft to CDFW, there will be a minimum 30 day public comment period. Following that period, the planning team and CDFW will work to improve the document. It must be emphasized that this is a science based planning document with no regulatory authority. It will be a guide to both development and mitigation efforts. Participation is one hundred percent voluntary and any individual or entity can participate or not. The first step--of getting CDFW to approve the AV RCIS--does not involve any mitigation agreements, credits, deals, or anything of that nature. After an approved RCIS is in place, any entity can work with CDFW on Mitigation Credit Agreements that must be consistent with the RCIS.

Having had access to the most recent administrative draft, staff is confident that the document submitted to CDFW will be of high caliber and reflective of the missions of the DMCA and most stakeholders. The Steering Committee will continue to provide input on the document. The Steering Committee is composed of the DMCA, Transition Habitat Conservancy, Conservation Strategies Group, California Energy Commission, Los Angeles County Regional Planning, SoCal Edison, LA Metro, The Nature Conservancy, and the Sierra Club.

The planning team's desire is to submit the first complete draft to CDFW and let public comment shape the document at that juncture. Staff concurs with the importance of moving the document forward so that the important scientific and planning information is available and recognized by CDFW. The staff recommendation is for the Governing Board to authorize the DMCA being the official public sponsor agency for the AV RCIS and

to potentially submit the document. However, more likely the planning team will submit the document.

Both Los Angeles County and the Tejon Ranch, Corporation have submitted objections on the inclusion of areas in the RCIS. The County wanted designated Economic Opportunity Areas be excluded. That request has been rejected because it would completely warp the scientific modeling and outright exclude critical habitat areas. Some of those EOAs are in County-designated Significant Ecological Areas. The planning team has not made a decision (to staff's knowledge) as of yet about Tejon Ranch's request. Item 6(e) on this agenda addresses Tejon Ranch's concerns both about the RCIS and the DMCA's participation in the RCIS process.

The RCIS process is entirely new. The guidelines regarding implementation are not detailed. Much of how the RCIS program will actually work must be flushed out over time. Without question it will provide an unparalleled level of scientific and land use data on a single platform. Without question it will provide a powerful science based tool to expand the quality and quantity of biological mitigation in the study area. All of this must occur with the approval of the CDFW. Apprehensions about exactly how the implementation will play out should be outweighed by the above guaranteed advantages. In perspective, the existing process and available planning and mitigation tools are woefully inadequate to protect one of the most unique ecosystems in California.

The planning team and committees are shouldering the burden and expense of the work. To get through the CDFW RCIS approval process will not strain DMCA staff. All projected RCIS submission fees will be paid through other sources. The extent to which the DMCA gets involved in the preparation of Mitigation Credit Agreements can be determined in the future. There are no DMCA obligations involved. The RCIS will require scientific updating in ten years to remain valid. Hopefully the success of the program will make that update effort a non-issue at that juncture.

**Attachment 5**

May 21, 2019 Letter from Tejon Ranch to DFW re conflicts (with attachments)



May 21, 2019

*Via Electronic Mail (ronald.unger@wildlife.ca.gov)*

California Department of Fish and Wildlife  
Attn.: Ron Unger, Environmental Program Mgr.  
Habitat Conservation Planning Branch  
Landscape Conservation Planning Program  
1416 9th Street, 12th Floor  
Sacramento, CA 95814

**Re: Antelope Valley Regional Conservation Investment Strategy (“AVRCIS”)**

Dear Mr. Unger,

Tejon Ranch Company, on behalf of itself and its subsidiary/affiliated entities Tejon Ranchcorp and Centennial Founders, LLC (collectively, the “Tejon Ranch”), sends this letter to insist that the California Department of Fish & Wildlife (“DFW”) take no further action on the AVRCIS until such time as those involved in its preparation unequivocally and entirely remove lands owned by Tejon Ranch not just from the AVRCIS study area (as has already been done in the most recent draft of the AVRCIS), ***but also from all purported scientific modeling and/or mitigation prioritization descriptions or visualizations contained in the AVRCIS.***

As will be explained below, removing Tejon Ranch’s lands from the study area, while retaining mapping and descriptions in the AVRCIS that continue to overlay purported scientific modeling and/or mitigation prioritization descriptions or visualizations on Tejon Ranch lands (as well as surrounding areas) confounds not just the purpose of the RCIS statute, but also effects demonstrable harm and damage to Tejon Ranch, other property owners, and public agencies that are outside of the study area. Retaining Tejon Ranch lands in such visualizations and descriptions also is contrary to the written commitments that the AVRCIS preparers have given us, and on which we have relied, as we continue to pursue our entitlements and development of the Centennial project in Los Angeles County. DFW should not countenance such conduct.

Sending this correspondence is not taken lightly by Tejon Ranch. Indeed, we have undertaken significant effort with those preparing the AVRCIS to avoid sending this correspondence. We very much value and appreciate the longstanding relationship that Tejon Ranch shares with the DFW. This correspondence is sent in that spirit of partnership because, unfortunately, Tejon Ranch feels that its concerns as a stakeholder in the AVRCIS process have not been heard by those preparing the document that is being presented to DFW for consideration.

1. **The AVRCIS is Unnecessary on Tejon Ranch Lands and Contradicts Contractual Requirements**

It bears noting that when Tejon Ranch voluntarily agreed to conserve 90% of its 270,000 acre landholdings pursuant to the Tejon Ranch Conservation and Land Use Agreement (the “Ranchwide

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Agreement”), it did so with the support of DFW. At the time, DFW joined other state agencies to acknowledge and support Tejon Ranch’s actions. (See Attachment 1.) The Ranchwide Agreement itself involved countless hours of on-site biological study, analysis and consensus between Tejon Ranch and five well-respected environmental organizations.<sup>1</sup> The result of this extensive study was the development of a conservation plan that protected areas of Tejon Ranch with some of the highest conservation priorities, while identifying the remaining 10% as areas where development would be more appropriate.

The Ranchwide Agreement obligates Tejon Ranch to preserve and conserve approximately 240,000 acres of its property through the phased dedication of conservation easements to the independent Tejon Ranch Conservancy; to date over 100,000 acres have been put under conservation easements in furtherance of the Ranchwide Agreement. Locating these easements was the subject to significant analysis and negotiation between Tejon Ranch and the resource groups during preparation of the Ranchwide Agreement. Additionally, and specific to Tejon Ranch’s request for exclusion from *both* the AVRCIS study area and from any mapping of mitigation priorities undertaken by the AVRCIS, the Ranchwide Agreement states that the “commercial operation of a mitigation bank, or the sale or other transfer of mitigation ‘credits’” within conservation easements is prohibited. (See Ranchwide Agreement, Exh. M, § 2(a)(11).)

As a result of the Ranchwide Agreement, there is no land on Tejon Ranch to achieve the AVRCIS’s primary purpose – nor does it therefore make sense to include purported scientific modeling and/or mitigation prioritization descriptions or visualizations that extend beyond the AVRCIS boundary. Simply put, the Ranchwide Agreement (i) already establishes a binding and comprehensive framework on Tejon Ranch for mitigating impacts of development, (ii) creates the funding mechanism by which such preservation will be maintained in perpetuity and (iii) does not authorize conservation on Tejon Ranch lands as described in the proposed draft AVRCIS.

For this reason alone, Tejon Ranch’s land must be *entirely* excluded from both the AVRCIS study area (as has already occurred) *and* from purported scientific modeling and/or mitigation prioritization descriptions or visualizations from the AVRCIS.

## 2. The AVRCIS Process is Plagued by Conflicts of Interest, Precluding its Consideration by DFW

The AVRCIS has been prepared by a number of non-governmental organizations and a nominal governmental agency known as the Desert & Mountain Conservation Authority (“DMCA”). It bears noting that several of the organizations involved in preparing the AVRCIS, such as the Center for Biological Diversity and the California Native Plant Society, are presently litigating or will soon be litigating against Tejon Ranch. These (and other) conflicts of interest permeate the AVRCIS process and caution against DFW considering further the AVRCIS.

As referenced in the prior paragraph, the Center for Biological Diversity and California Native Plant Society have both played an active role in development of the AVRCIS, as reflected in Appendix C of the most recent draft AVRCIS (the “February 2019 Draft AVRCIS”). Appendix C of the February 2019 Draft AVRCIS indicates that, as members of the AVRCIS Advisory Committee, these organizations were heavily involved in preparing the draft versions of the AVRCIS by providing information on “ecological resources” and reviewing and commenting on interim AVRCIS work product. This Advisory Committee

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<sup>1</sup> See <https://www.sec.gov/Archives/edgar/data/96869/000119312508138009/dex1028.htm>. Signatories to the Ranchwide Agreement include the Tejon Ranch Conservancy, along with the Natural Resources Defense Council, the National Audubon Society, the Sierra Club, the Endangered Habitats League and the Planning and Conservation League (collectively, “resource groups”).

met at least four times, as noted in Appendix C. In addition, the representative of the California Native Plant Society also served on the AVRCIS Technical Subcommittee. As reflected in Appendix C, the Technical Subcommittee met seven times and appears to have been heavily involved in decisions on how resources were characterized and prioritized in the AVRCIS. This record indicates that these organizations were able to influence the preparation of the AVRCIS in its earlier as well as current iterations, which documentation was eventually used and acted on in a governmental capacity by DMCA.

Unsurprisingly, the Center for Biological Diversity turned its participation in the AVRCIS process to its advantage by submitting to Los Angeles County a June 2017 “administrative draft” AVRCIS as part of a comment letter that was critical of Tejon Ranch’s Centennial Specific Plan.<sup>2</sup> Effectively, the Center for Biological Diversity weaponized an administrative draft document *that it participated in creating* for its self-serving purpose of opposing a development project within the draft document’s initial study area – a study area that now nominally does not include Tejon Ranch. It should not be surprising, then, *having used a draft document it helped create*, that the Center for Biological Diversity has mentioned multiple times since the Los Angeles County Board of Supervisor’s December 11, 2018 approval that it intends to file suit over approval of the Centennial project. The Center for Biological Diversity is also presently a named plaintiff in two other suits against Tejon Ranch projects.

Separately, the California Native Plant Society has also been vocally critical of the Centennial project and has submitted written comments to Los Angeles, indicating its intention to file suit on approval of the Centennial project. The individual representative of the California Native Plant Society who has participated in the AVRCIS process and is listed in Appendix C of the most recent draft AVRCIS, Greg Suba, has sought to influence other state agencies to oppose Centennial. See Attachment 2.

Separately, each of the resource groups (who are signatories to the Ranchwide Agreement) participated in preparing the draft AVRCIS. Members of these resource groups served either on the AVRCIS Steering Committee or the AVRCIS Advisory Committee at some point during the process. Subsequently, many of these resource groups resigned from these committees when confronted with the evident conflict of interest in (i) serving in a governmental or quasi-governmental capacity to approve the AVRCIS, on one hand, and (ii) the potential that their service in preparing the AVRCIS constituted a breach of their fiduciary and contractual obligations under the Ranchwide Agreement, on the other hand.

One example of an obvious conflict was the participation and leadership of Ms. Terry Watt in the development of the AVRCIS. While there is only one reference to Ms. Watt in the most recent draft of the AVRCIS, her leadership in the AVRCIS is extensively documented in the June 2017 administrative draft AVRCIS (including multiple references in Section 6 of that document). During the timeframe Ms. Watt was providing consulting services to DMCA and those preparing the AVRCIS, she concurrently served a member of the Board of Directors of the Tejon Ranch Conservancy *and, further*, shortly before such activity regarding the AVRCIS she had received reimbursement for professional services from Tejon Ranch for her work with the Tejon Ranch Conservancy. Only after Tejon Ranch objected to these obvious conflicts of interest does it appear Ms. Watt recused herself (belatedly and without legal effect to

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<sup>2</sup> The County of Los Angeles responded to these comments, and specifically addressed and contradicted the analysis of the mitigation and prioritization concepts contained in the June administrative draft AVRCIS. This contradiction is even more forceful in light of the fact there is no pending draft AVRCIS, let alone a complete and approved study. Further, Los Angeles County has similarly objected multiple times to inclusion of “economic opportunity areas” within the approved Antelope Valley Area Plan (AVAP), adopted by the Los Angeles County Board of Supervisors. The AVAP was challenged by the Center for Biological Diversity, but Los Angeles prevailed entirely, resulting in an appellate court decision upholding the AVAP and its environmental analysis. Most recently, Los Angeles County submitted a letter to DMCA reiterating its objections, which is included with this letter as Attachment 4.

the prejudice already created and which permeates the AVRCIS process to this date, we might add). Recent correspondence from Ms. Watt is an admission of this conflict. See Attachment 3.

These blatant conflicts of interest do not appear to have been disclosed to the DMCA, DFW or others. Governmental decisions, such as DMCA's decision to act as the "public agency" submitting the AVRCIS or its decision to approve a draft AVRCIS, or such as DFW's decision to approve an RCIS should not involve the participation of such heavily self-interested individuals or groups. Allowing a study to proceed that was tainted at its formative stage, and continuing through the majority of the work being conducted, by these conflicts poses grave public ethics concerns; these concerns cannot be resolved at this late stage by the recusal of those conflicted individuals and groups.

### 3. The AVRCIS Must be Revised to Reflect the Commitments Made to Tejon Ranch

On May 8, 2019, Tejon Ranch learned that the DMCA submitted the February 2019 Draft AVRCIS to the DFW. At that time, Tejon Ranch also learned that the Santa Monica Mountains Conservancy (which itself negatively commented on the Centennial project that was approved by the Los Angeles County Board of Supervisors) acted to become the "state sponsor" of the AVRCIS (pursuant to Fish & Game Code § 1850(a)).

Until it received the agenda for the May 8<sup>th</sup> DMCA meeting, Tejon Ranch was unaware of any ongoing activity pertaining to the AVRCIS. In fact, we had been told that the AVRCIS process was on an indefinite hold. So, we were grateful that DFW provided a copy of the February 2019 Draft AVRCIS to us. Upon review of this draft, it became clear that commitments made by those preparing the AVRCIS to *entirely* remove Tejon Ranch from the AVRCIS had not been honored.

In August and September of 2017, Tejon Ranch communicated its demand to be removed from not just the AVRCIS study area but also from the purported scientific modeling and mitigation priority analysis. As stated in our September 5, 2017 letter to the DMCA and the AVRCIS Steering Committee:

Tejon Ranch understands the AVRCIS will now (and in any future version prepared by DMCA) exclude any reference or depiction of Tejon Ranch lands as being within the AVRCIS study area, and will exclude any discussion of Tejon Ranch lands from substantive analysis. It is our further understanding that any modeling used in the AVRCIS is being revised to account for exclusion of Tejon Ranch lands and such revised modeling will not include discussion, depiction, analysis or reference to Tejon Ranch lands. (See Attachment 5.)

The aforementioned statement confirming our understanding was based on *written representations* from DMCA representatives on August 15, 2017 stating that, following "consulting with the AV RCIS steering committee, ICF will be removing Tejon Ranch from the AV RCIS study area . . ." (See Attachment 6.) Thereafter, on September 18, 2017, Graham Chisolm, a primary author and consultant of DMCA for the AVRCIS, *confirmed in writing* Tejon Ranch's understanding:

[T]he steering committee was comfortable with the recommendation to remove Tejon Ranch from the draft Antelope Valley Regional Conservation Investment Strategy (AVRCIS). ICF International is modifying the draft AVRCIS in order to implement the recommendation, *including removing references to the Tejon Ranch from the draft AVRCIS' narrative analysis and maps.* (See Attachment 7 (emph. supp.))

Thus, Tejon Ranch not only understood, but detrimentally relied on, the written commitments of DMCA and AVRCIS proponents that the next version of the AVRCIS would not include Tejon Ranchlands in the AVRCIS study area *and* would not include any mapping overlay on Tejon Ranch lands.

To our surprise the February 2019 Draft AVRCIS demonstrates that DMCA and those preparing the AVRCIS did not honor their written commitments.<sup>3</sup> Tejon Ranch strongly urges DFW, DMCA and those preparing the AVRCIS to consider taking immediate steps to remove all mapping, depiction, visualization and other analysis or narrative from Tejon Ranch lands. In this case, Tejon Ranch has and is undertaking significant activity and incurring costs in relation to the planning and development of the Centennial project in reliance of the prior commitment that Tejon Ranch is being *entirely* removed from the AVRCIS. Not abiding by DMCA's commitment creates significant risk to DFW, DMCA and those preparing the AVRCIS. (See *HPT IHG-2 Properties Trust v. City of Anaheim* (2015) 243 Cal.App.4th 188.)

#### 4. Other Infirmities Plague the AVRCIS Process, Rendering it Unlawful

The process to prepare and submit *any version* of the AVRCIS has been tainted by violations of state law. Without fully cataloguing these violations, which we reserve our right to do at a later date, there are several concerns that call into question the AVRCIS process to date and which preclude DFW from taking any action on the current AVRCIS.

First, *only* a public agency has statutory authority to “propose”, “develop”, “create” or “submit” an RCIS for DFW's consideration. (Cal. Fish & Game Code §§ 1852(a), 1854(c).) The statute does not contemplate or authorize the preparation of an RCIS by private parties. Nor does the statute contemplate or authorize private party preparation of an RCIS to avoid compliance with applicable law, such as governmental transparency statutes found in the Brown Act, the Public Records Act or the Political Reform Act.<sup>4</sup> (Compare, Cal. Fish & Game Code § 1854(c) subdiv. (3)(A) with (D) (speaking to circumstances for holding a meeting where a “public agency proposing a strategy” has initiated an RCIS either before or following January 1, 2017).) For similar reasons, the statute does not permit private preparation of an RCIS, which is later “adopted” by a public agency in an effort to skirt applicable laws.

Notwithstanding the clear statutory requirement that an RCIS be developed, created and submitted by a public agency, the AVRCIS process did not involve the required public agency sponsorship until September 13, 2017 – at which time DMCA's governing body acted, *for the first time*, to interject itself as the sponsor of the AVRCIS.<sup>5</sup>

The agenda for the September 13, 2017 regularly scheduled meeting of the DMCA included an item to officially (*and for the first time*) authorize DMCA to be the “sponsor” for the AVRCIS and to authorize submittal of “an AVRCIS” to the Department. As part of a staff report and discussion on this agenda item, staff for DMCA stated that (a) the AVRCIS process to that date had been purely private in nature and (b) it was the intention of those actually preparing the AVRCIS to avoid public scrutiny of their work

<sup>3</sup> Numerous maps in the February 2019 Draft AVRCIS continue to include purported scientific modeling and mitigation prioritization overlaid on Tejon Ranch lands. As examples, attached hereto at Attachment 8 are several maps from the February 2019 Draft AVRCIS. These maps, all other maps, and any other narrative or analysis must be revised to remove any such overlay from Tejon Ranch lands.

<sup>4</sup> Based on analysis to date by Tejon Ranch, including review of records provided by DMCA, we believe that the AVRCIS process has encountered violations of all three of these statutes. As examples, this letter identifies conflicts of interest in those who have participated in preparing the AVRCIS. For the time being we reserve our rights with respect to these issues. It does bear noting, however, that each of these statutes includes private attorney general provisions and the ability to seek advice from (or bring complaints to) other independent state agencies.

<sup>5</sup> Prior to this September 13, 2017 meeting, the DMCA governing board only received two briefings on the “regional conservation framework” (the precursor to the RCIS process, which precursor had no basis in statute) and acted to receive a grant to assist with the RCF. At no time did the DMCA governing board, prior to September 13, 2017, take any action that could remotely be viewed as authorizing sponsorship, creation or preparation of the AVRCIS.

product until it was submitted to the Department. A full transcript of the September 13, 2017 meeting has been prepared by Tejon Ranch from audio files provided by DMCA. This transcript can be provided to DFW later, if needed. However, those statements made at the September 13, 2017 meeting that are germane to demonstrating the *intentional* desire to maintain secrecy are as follow:

Mr. Edelman: "But right now, it's a private document that's moving forward through this planning team hired by Bechtel and the Windward Foundation." (Minute 21:58)

\*\*\*

Mr. Edelman: "Since you haven't seen the final draft of it, and that the people who are preparing it don't want that final draft to go public until it goes to the Department of Fish and Wildlife, that you could make it so that the chair could get final approval of it, potentially to... Before it gets submitted to Fish and Wildlife." . . . "But that the planning team really thought it would be better, and move the process along farther, if it could go to that stage without being widely distributed public wide." (Minute 34:40.)

Against this factual background, it is also important to note that the February 2019 Draft AVRCIS inaccurately represents to DFW that the AVRCIS process was initiated by DMCA in 2016 – which it was not. The February 2019 Draft AVRCIS states, the "Antelope Valley RCIS development process began in March 2016." (February 2019 Draft AVRCIS at § 1.4.2.) The February 2019 Draft AVRCIS goes on to claim that "[t]he process was initiated by the Desert and Mountains Conservation Authority (DMCA) in collaboration with the California Energy Commission (CEC)." (*Ibid.*) This statement is not accurate.

The DMCA governing board did not meet at all in 2015 and only met twice in 2016. The only two meetings of the DMCA governing board occurred *after* March of 2016, on June 15, 2016 and on September 9, 2016. (See [http://dmca.ca.gov/agenda\\_archive.asp](http://dmca.ca.gov/agenda_archive.asp).) Furthermore, neither of the meetings held in 2016 by the DMCA governing board created a "DMCA Steering Committee" or took any action to authorize or "initiate" preparation of the AVRCIS.<sup>6</sup>

Comparing (1) the action taken at the DMCA's September 13, 2017 meeting, the quoted statements of DMCA staff at this meeting describing the secretive nature of the AVRCIS process to date, and the omission of DMCA taking *any* action whatsoever until September 13, 2017 to become the "sponsoring" public agency for the AVRCIS with (2) the statements made in the February 2019 Draft AVRCIS, which are patently inaccurate, is itself sufficient basis to reject any further effort to process the AVRCIS.<sup>7</sup>

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<sup>6</sup> The June 15, 2016 DMCA governing board meeting included several agenda items pertaining to a "regional conservation framework" for the Antelope Valley, and consideration of a resolution accepting grant funding for involvement in the "regional conservation framework" See [http://smmc.ca.gov/Agendas\\_DMCA/agenda\\_527.pdf](http://smmc.ca.gov/Agendas_DMCA/agenda_527.pdf) (agenda); [http://smmc.ca.gov/Agendas\\_DMCA/minute\\_527.pdf](http://smmc.ca.gov/Agendas_DMCA/minute_527.pdf) (minutes). The September 9, 2016 DMCA governing board meeting included consideration of a resolution supporting AB 2087, which legislation created the regional conservation investment strategy process. See [http://smmc.ca.gov/Agendas\\_DMCA/agenda\\_534.pdf](http://smmc.ca.gov/Agendas_DMCA/agenda_534.pdf) (agenda); [http://smmc.ca.gov/Agendas\\_DMCA/minute\\_534.pdf](http://smmc.ca.gov/Agendas_DMCA/minute_534.pdf) (minutes).

<sup>7</sup> As noted above, only a public agency has statutory authority to "propose", "develop", "create" or "submit" an RCIS to the Department for consideration. Cal. Fish & Game Code §§ 1852(a), 1854(c). The statute does not contemplate, let alone authorize the preparation of an RCIS by private parties who, at some later date and time, then "forum shop" an RCIS to a public agency that later enters the process to serve as the nominal public agency sponsor. Such a charade not only contradicts the Fish & Game Code (*compare*, § 1854(c) subdiv. (3)(A) with (D) [describing circumstances for holding a meeting where a "public agency proposing a strategy" has initiated an RCIS either before or following January 1, 2017]), but such shenanigans run afoul of, if not are a blatant affront to, basic

Second, unless a public agency initiated a RCIS before January 1, 2017, the public agency must first publish a notice of intent to create an RCIS and file such notice with the Office of Planning and Research and the county clerk of counties where the RCIS is found. (Cal. Fish & Game Code § 1854(c)(1); *see also* Govt. Code § 6040 (specifying method of publication applicable to all public agency publication obligations).) DMCA, as the sole public agency that has initiated this activity to create the AVRCIS (which it did not do until September 13, 2017) has not complied with this requirement. Nor, as summarized above, does Tejon Ranch believe the statute authorizing creation of RCIS permit private third parties to prepare these studies on their own for later submittal to DFW.

Specifically, in this regard, Tejon Ranch made a public records request seeking proof of publication and a copy of this required notice. Tejon Ranch sought: “The notice of intention to create the AVRCIS published by DMCA (as provided and required by Fish & Game Code § 1854(c)(1)). . . . Proof of publication for the notice of intention referenced in Item 2 above in an adjudicated newspaper of general circulation. See Gov. Code § 6041. . . . Proof of filing of the notice referenced in Item 2 above with the Governor’s Office of Planning and Research and the County Clerk of Los Angeles County (as provided and required by Fish & Game Code § 1854(c)(1)).” No responsive documents were provided by DMCA to Tejon Ranch. Thus, the requirements of Fish & Game Code § 1854(c)(1) were not complied with.

For these and other reasons DFW lacks statutory authority to act on the AVRCIS. As also discussed, at a minimum, Tejon Ranch lands must be removed from all purported scientific modeling and/or mitigation prioritization descriptions or visualizations contained in the AVRCIS. Further, the study itself is flawed as a result of the participation of those with self-serving interest in its contents, including those who participated in the process to gain litigation advantage over land-owners.

Very Truly Yours,



Michael R.W. Houston  
Senior Vice President, General Counsel & Secretary

cc: Mr. Charlton H. Bonham (*via electronic mail*)  
Desert & Mountain Conservation Authority (*via electronic mail*)  
Santa Monica Mountains Conservancy (*via electronic mail*)  
Mr. Graham Chisolm (*via electronic mail*)  
Resource Groups (*via electronic mail*)

**Attachments:**

1. May 1, 2008, Letter from California environmental agencies in support of Ranchwide Agreement
2. September 18, 2019, Email exchange between California Native Plant Society members and state agency representatives
3. May 15, 2019, Email from Ms. Watt
4. May 7, 2019, Letter from Los Angeles County to DMCA (with additional attachments)
5. September 5, 2017, Letter from Tejon Ranch to the DMCA and the AVRCIS Steering Committee
6. August 15, 2017, Email from AVRCIS representative to Tejon Ranch
7. September 18, 2017, Email from Mr. Chisolm to Tejon Ranch
8. Examples of depictions in February 2019 Draft AVRICS

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principles of governmental transparency, open record keeping, conflicts of interest and due process that apply to public agency operations.

**Attachment 1**

May 1, 2008, Letter from California environmental agencies in support of Ranchwide Agreement

(omitted)

**Attachment 2**

September 18, 2019, Email exchange between California Native Plant Society members and state agency representatives

**From:** Nick Jensen [njensen@cnps.org]  
**Sent:** 9/19/2018 8:48:55 AM  
**To:** Rabinowitsh, Nicholas@ARB [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=6e6383bd86f84a93a340406200df1e76-Nicholas Ra]  
**CC:** Alfredo Arredondo [alfredo@priorityca.com]; Greg Suba [gsuba@cnps.org]  
**Subject:** Re: Request for Meeting Re: CEQA Mitigation and Offsets

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

11 am on Friday works for me. We can use one of the CNPS conference call lines if needed.

Thanks,  
Nick

On Wed, Sep 19, 2018 at 8:44 AM, Rabinowitsh, Nicholas@ARB <[Nicholas.Rabinowitsh@arb.ca.gov](mailto:Nicholas.Rabinowitsh@arb.ca.gov)> wrote:  
Alfredo: that would be great, thanks!

Nick Rabinowitsh  
Senior Attorney  
California Air Resources Board, Legal Office  
Tel: (916) 322-3762

**From:** Alfredo Arredondo <[alfredo@priorityca.com](mailto:alfredo@priorityca.com)>  
**Sent:** Wednesday, September 19, 2018 7:43 AM  
**To:** Rabinowitsh, Nicholas@ARB <[Nicholas.Rabinowitsh@arb.ca.gov](mailto:Nicholas.Rabinowitsh@arb.ca.gov)>  
**Cc:** Greg Suba <[gsuba@cnps.org](mailto:gsuba@cnps.org)>; Nick Jensen <[njensen@cnps.org](mailto:njensen@cnps.org)>

**Subject:** Re: Request for Meeting Re: CEQA Mitigation and Offsets

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Let's make it 11am. Nick R., let me know if you would like me to use my conference line for this and I will send a calendar invite with the call information.

Thanks.

/Alfredo Arredondo  
**Priority Strategies**

1225 8th St., Suite 375  
Sacramento, CA 95814

o: 916-538-2452  
c: 805-598-9350  
e: [alfredo@priorityca.com](mailto:alfredo@priorityca.com)

On Tue, Sep 18, 2018 at 5:25 PM, Rabinowitsh, Nicholas@ARB <[Nicholas.Rabinowitsh@arb.ca.gov](mailto:Nicholas.Rabinowitsh@arb.ca.gov)> wrote:  
All – yes, 10-1 range works for me. Let me know what specific time works best for you all. Thanks!

Nick Rabinowitsh  
Senior Attorney  
California Air Resources Board, Legal Office  
Tel: (916) 322-3762

**From:** Greg Suba <[gsuba@cnps.org](mailto:gsuba@cnps.org)>  
**Sent:** Tuesday, September 18, 2018 4:07 PM  
**To:** Nick Jensen <[njensen@cnps.org](mailto:njensen@cnps.org)>  
**Cc:** Alfredo Arredondo <[alfredo@priorityca.com](mailto:alfredo@priorityca.com)>; Rabinowitsh, Nicholas@ARB <[Nicholas.Rabinowitsh@arb.ca.gov](mailto:Nicholas.Rabinowitsh@arb.ca.gov)>  
**Subject:** Re: Request for Meeting Re: CEQA Mitigation and Offsets

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

I'm available Friday from 10am-1pm, then otherwise in transit to/from Bay Area with spotty phone service (Amtrak).

If 10-1 works, then I'll join. If a time outside that is necessary, I'm happy to catch up with Nick (J) and Alfredo afterwards.

Greg

On Tue, Sep 18, 2018 at 4:04 PM, Nick Jensen <[njensen@cnps.org](mailto:njensen@cnps.org)> wrote:

My schedule on Friday afternoon is pretty open. Greg-how about you?

Thanks,  
Nick

On Tue, Sep 18, 2018 at 3:49 PM, Alfredo Arredondo <[alfredo@priorityca.com](mailto:alfredo@priorityca.com)> wrote:

Hello Nick,

Friday afternoon would work on my end. I am copying Greg and Nick with CNPS as well to see what their availability is. Thanks for your time.

/Alfredo Arredondo  
**Priority Strategies**

1225 8th St., Suite 375  
Sacramento, CA 95814  
o: 916-538-2452  
c: 805-598-9350  
e: [alfredo@priorityca.com](mailto:alfredo@priorityca.com)

On Tue, Sep 18, 2018 at 2:40 PM, Rabinowitsh, Nicholas@ARB <[Nicholas.Rabinowitsh@arb.ca.gov](mailto:Nicholas.Rabinowitsh@arb.ca.gov)> wrote:

Alfredo: Rajinder forwarded your email to me. I'd be happy to talk - would you be able to do a call on Friday? Perhaps in the afternoon? If so, what times work for you?

Thanks,

Nick Rabinowitsh  
Senior Attorney  
California Air Resources Board, Legal Office  
Tel: (916) 322-3762

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**From:** Alfredo Arredondo <[alfredo@priorityca.com](mailto:alfredo@priorityca.com)>  
**Sent:** Tuesday, September 18, 2018 1:22:47 PM  
**To:** Sahota, Rajinder@ARB  
**Cc:** Greg Suba; Nick Jensen  
**Subject:** Request for Meeting Re: CEQA Mitigation and Offsets

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello Rajinder,

I am reaching out on behalf of my client, the CA Native Plant Society, to see if we can find a time this week to discuss a proposed development in Southern California, the Centennial Project, and their use of offsets from the Cap and Trade regulation in order to comply with CEQA requirements. Attached is the FEIR Supplement related to GHG emissions compliance for the project (link to additional documents for project available [here](#)) which is raising lots of eyebrows for us. In particular, on the third page they say the following:

"Approximately 96 percent (150,808 MTCO<sub>2</sub>e/yr) of the Updated GHG Calculations emissions are covered by, and subject to, the purchase of emission allowances under the new, expanded state Cap and Trade program approved

by the Legislature after the DEIR was issued, and signed into law in 2017 (Assembly Bill 398 [AB 398]). The Cap and Trade program was designed to comprehensively regulate fossil fuels (from "wells to wheels" – from production, through refining, through ultimate consumption) and is expected to raise gasoline prices within a range of approximately 15 to 63 cents per gallon by 2021, and from 24 to 73 cents per gallon by 2031, according to the non-partisan California Legislative Analyst Office.<sup>1</sup> Compliance with the Cap and Trade program was upheld as a lawful CEQA mitigation measure to reduce GHG emissions to a less-than-significant-level for fossil fuels used by a refinery project for both direct refinery operations as well as indirect electricity consumption-related GHG emissions in a recent CEQA appellate court case, Association of Irrigated Residents v. Kern County Board of Supervisors, et al. (Alon USA Energy, Inc., et al., Real Parties in Interest) (2017) 17 Cal.App.5th 708. The California Supreme Court declined to reverse, or de-publish, this case. The California Air Resources Board (CARB) has also determined that existing California law provides sufficient authority to extend the Cap and Trade program as required to meet state GHG reduction objectives.<sup>2</sup> See Table 3. "

This raises a lot of questions for us that we hope to get your insight on including:

- Is this type of compliance pathway for non-capped or non-covered entities like a housing developer truly the intent of the cap-and-trade mechanism?
- Are there other examples of a developer in the state using offsets in this way?
- Does the Irrigated Residents v. Kern case apply only to capped or covered entities or is the interpretation that this applies to any entity, regulated or not, correct?

I know that this is a lot of information, but I figure that having a conversation with you about this will help clear things up for us. Please let me know if there are some times that work for you this week. Greg Suba, copied on the message, is based in Sacramento, but Nick Jensen, is based in Southern California and could join by phone if possible.

Thanks for your time, and I look forward to reconnecting soon.

/Alfredo Arredondo  
**Priority Strategies**

1225 8th St., Suite 375  
Sacramento, CA 95814  
o: 916-538-2452  
c: 805-598-9350  
e: [alfredo@priorityca.com](mailto:alfredo@priorityca.com)

--  
Nick Jensen, PhD  
Southern California Conservation Analyst  
California Native Plant Society  
1500 North College Ave

Claremont, CA 91711

[njensen@cnps.org](mailto:njensen@cnps.org)

(530) 368-7839

--

/Alfredo Arredondo

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e: [alfredo@priorityca.com](mailto:alfredo@priorityca.com)

--

Nick Jensen, PhD

Southern California Conservation Analyst

California Native Plant Society

1500 North College Ave

Claremont, CA 91711

[njensen@cnps.org](mailto:njensen@cnps.org)

(530) 368-7839

**Attachment 3**

May 15, 2019, Email from Ms. Watt

**From:**  
**To:** FW: Antelope Valley RCIS Matter  
**Subject:** Monday, May 20, 2019 12:24:15 PM  
**Date:**

---

**From:** Terry Watt <[terryjwatt@](mailto:terryjwatt@)>  
**Date:** May 15, 2019 at 1:16:03 AM GMT+2  
**To:** "Gary Hunt" <[ghunt@](mailto:ghunt@)>  
**Cc:** "Dan Silver" <[dsilverla@](mailto:dsilverla@)>, "Reynolds, Joel" <[jreynolds@](mailto:jreynolds@)>, <[terryjwatt@](mailto:terryjwatt@)>  
**Subject:** Antelope Valley RCIS Matter

Gary,

This email is to inform you that I withdrew from any and all involvement in the Antelope Valley RCIS well over a year ago when the Ranch brought its concerns to the attention of the Tejon Ranch Conservancy Board.

Terry Watt

[TerryJWatt@](mailto:TerryJWatt@)

Please update your contacts

**Attachment 4**

May 7, 2019, Letter from Los Angeles County to DMCA (with additional attachments)

(omitted)

**Attachment 5**

September 5, 2017, Letter from Tejon Ranch to the DMCA and the AVRCIS Steering Committee

(omitted)

**Attachment 6**

August 15, 2017, Email from AVRCIS representative to Tejon Ranch

(omitted)

**Attachment 7**

September 18, 2017, Email from Mr. Chisolm to Tejon Ranch

(omitted)

**Attachment 8**

Examples of depictions in February 2019 Draft AVRICS

(omitted)

**Attachment 6**

Audio recording of September 13, 2017  
DMCA Governing Board Meeting (thumb-drive)  
(only included in hard copy transmittals)



May 21, 2019

*Via Electronic Mail (ronald.unger@wildlife.ca.gov)*

California Department of Fish and Wildlife  
Attn.: Ron Unger, Environmental Program Mgr.  
Habitat Conservation Planning Branch  
Landscape Conservation Planning Program  
1416 9th Street, 12th Floor  
Sacramento, CA 95814

**Re: Antelope Valley Regional Conservation Investment Strategy (“AVRCIS”)**

Dear Mr. Unger,

Tejon Ranch Company, on behalf of itself and its subsidiary/affiliated entities Tejon Ranchcorp and Centennial Founders, LLC (collectively, the “Tejon Ranch”), sends this letter to insist that the California Department of Fish & Wildlife (“DFW”) take no further action on the AVRCIS until such time as those involved in its preparation unequivocally and entirely remove lands owned by Tejon Ranch not just from the AVRCIS study area (as has already been done in the most recent draft of the AVRCIS), *but also from all purported scientific modeling and/or mitigation prioritization descriptions or visualizations contained in the AVRCIS.*

As will be explained below, removing Tejon Ranch’s lands from the study area, while retaining mapping and descriptions in the AVRCIS that continue to overlay purported scientific modeling and/or mitigation prioritization descriptions or visualizations on Tejon Ranch lands (as well as surrounding areas) confounds not just the purpose of the RCIS statute, but also effects demonstrable harm and damage to Tejon Ranch, other property owners, and public agencies that are outside of the study area. Retaining Tejon Ranch lands in such visualizations and descriptions also is contrary to the written commitments that the AVRCIS preparers have given us, and on which we have relied, as we continue to pursue our entitlements and development of the Centennial project in Los Angeles County. DFW should not countenance such conduct.

Sending this correspondence is not taken lightly by Tejon Ranch. Indeed, we have undertaken significant effort with those preparing the AVRCIS to avoid sending this correspondence. We very much value and appreciate the longstanding relationship that Tejon Ranch shares with the DFW. This correspondence is sent in that spirit of partnership because, unfortunately, Tejon Ranch feels that its concerns as a stakeholder in the AVRCIS process have not been heard by those preparing the document that is being presented to DFW for consideration.

1. The AVRCIS is Unnecessary on Tejon Ranch Lands and Contradicts Contractual Requirements

It bears noting that when Tejon Ranch voluntarily agreed to conserve 90% of its 270,000 acre landholdings pursuant to the Tejon Ranch Conservation and Land Use Agreement (the “Ranchwide

P.O. Box 1000 | 4436 Lebec Road  
Tejon Ranch, CA 93243  
661 248 3000 O | 661 248 3100 F  
[www.tejonranch.com](http://www.tejonranch.com)

Tejon Ranch Co. (NYSE:TRC) – a diversified real estate development and agribusiness company.

Agreement”), it did so with the support of DFW. At the time, DFW joined other state agencies to acknowledge and support Tejon Ranch’s actions. (See Attachment 1.) The Ranchwide Agreement itself involved countless hours of on-site biological study, analysis and consensus between Tejon Ranch and five well-respected environmental organizations.<sup>1</sup> The result of this extensive study was the development of a conservation plan that protected areas of Tejon Ranch with some of the highest conservation priorities, while identifying the remaining 10% as areas where development would be more appropriate.

The Ranchwide Agreement obligates Tejon Ranch to preserve and conserve approximately 240,000 acres of its property through the phased dedication of conservation easements to the independent Tejon Ranch Conservancy; to date over 100,000 acres have been put under conservation easements in furtherance of the Ranchwide Agreement. Locating these easements was the subject to significant analysis and negotiation between Tejon Ranch and the resource groups during preparation of the Ranchwide Agreement. Additionally, and specific to Tejon Ranch’s request for exclusion from *both* the AVRCIS study area and from any mapping of mitigation priorities undertaken by the AVRCIS, the Ranchwide Agreement states that the “commercial operation of a mitigation bank, or the sale or other transfer of mitigation ‘credits’” within conservation easements is prohibited. (See Ranchwide Agreement, Exh. M, § 2(a)(11).)

As a result of the Ranchwide Agreement, there is no land on Tejon Ranch to achieve the AVRCIS’s primary purpose – nor does it therefore make sense to include purported scientific modeling and/or mitigation prioritization descriptions or visualizations that extend beyond the AVRCIS boundary. Simply put, the Ranchwide Agreement (i) already establishes a binding and comprehensive framework on Tejon Ranch for mitigating impacts of development, (ii) creates the funding mechanism by which such preservation will be maintained in perpetuity and (iii) does not authorize conservation on Tejon Ranch lands as described in the proposed draft AVRCIS.

For this reason alone, Tejon Ranch’s land must be *entirely* excluded from both the AVRCIS study area (as has already occurred) *and* from purported scientific modeling and/or mitigation prioritization descriptions or visualizations from the AVRCIS.

## 2. The AVRCIS Process is Plagued by Conflicts of Interest, Precluding its Consideration by DFW

The AVRCIS has been prepared by a number of non-governmental organizations and a nominal governmental agency known as the Desert & Mountain Conservation Authority (“DMCA”). It bears noting that several of the organizations involved in preparing the AVRCIS, such as the Center for Biological Diversity and the California Native Plant Society, are presently litigating or will soon be litigating against Tejon Ranch. These (and other) conflicts of interest permeate the AVRCIS process and caution against DFW considering further the AVRCIS.

As referenced in the prior paragraph, the Center for Biological Diversity and California Native Plant Society have both played an active role in development of the AVRCIS, as reflected in Appendix C of the most recent draft AVRCIS (the “February 2019 Draft AVRCIS”). Appendix C of the February 2019 Draft AVRCIS indicates that, as members of the AVRCIS Advisory Committee, these organizations were heavily involved in preparing the draft versions of the AVRCIS by providing information on “ecological resources” and reviewing and commenting on interim AVRCIS work product. This Advisory Committee

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<sup>1</sup> See <https://www.sec.gov/Archives/edgar/data/96869/000119312508138009/dex1028.htm>. Signatories to the Ranchwide Agreement include the Tejon Ranch Conservancy, along with the Natural Resources Defense Council, the National Audubon Society, the Sierra Club, the Endangered Habitats League and the Planning and Conservation League (collectively, “resource groups”).

met at least four times, as noted in Appendix C. In addition, the representative of the California Native Plant Society also served on the AVRCIS Technical Subcommittee. As reflected in Appendix C, the Technical Subcommittee met seven times and appears to have been heavily involved in decisions on how resources were characterized and prioritized in the AVRCIS. This record indicates that these organizations were able to influence the preparation of the AVRCIS in its earlier as well as current iterations, which documentation was eventually used and acted on in a governmental capacity by DMCA.

Unsurprisingly, the Center for Biological Diversity turned its participation in the AVRCIS process to its advantage by submitting to Los Angeles County a June 2017 “administrative draft” AVRCIS as part of a comment letter that was critical of Tejon Ranch’s Centennial Specific Plan.<sup>2</sup> Effectively, the Center for Biological Diversity weaponized an administrative draft document *that it participated in creating* for its self-serving purpose of opposing a development project within the draft document’s initial study area – a study area that now nominally does not include Tejon Ranch. It should not be surprising, then, *having used a draft document it helped create*, that the Center for Biological Diversity has mentioned multiple times since the Los Angeles County Board of Supervisor’s December 11, 2018 approval that it intends to file suit over approval of the Centennial project. The Center for Biological Diversity is also presently a named plaintiff in two other suits against Tejon Ranch projects.

Separately, the California Native Plant Society has also been vocally critical of the Centennial project and has submitted written comments to Los Angeles, indicating its intention to file suit on approval of the Centennial project. The individual representative of the California Native Plant Society who has participated in the AVRCIS process and is listed in Appendix C of the most recent draft AVRCIS, Greg Suba, has sought to influence other state agencies to oppose Centennial. See Attachment 2.

Separately, each of the resource groups (who are signatories to the Ranchwide Agreement) participated in preparing the draft AVRCIS. Members of these resource groups served either on the AVRCIS Steering Committee or the AVRCIS Advisory Committee at some point during the process. Subsequently, many of these resource groups resigned from these committees when confronted with the evident conflict of interest in (i) serving in a governmental or quasi-governmental capacity to approve the AVRCIS, on one hand, and (ii) the potential that their service in preparing the AVRCIS constituted a breach of their fiduciary and contractual obligations under the Ranchwide Agreement, on the other hand.

One example of an obvious conflict was the participation and leadership of Ms. Terry Watt in the development of the AVRCIS. While there is only one reference to Ms. Watt in the most recent draft of the AVRCIS, her leadership in the AVRCIS is extensively documented in the June 2017 administrative draft AVRCIS (including multiple references in Section 6 of that document). During the timeframe Ms. Watt was providing consulting services to DMCA and those preparing the AVRCIS, she concurrently served a member of the Board of Directors of the Tejon Ranch Conservancy *and, further*, shortly before such activity regarding the AVRCIS she had received reimbursement for professional services from Tejon Ranch for her work with the Tejon Ranch Conservancy. Only after Tejon Ranch objected to these obvious conflicts of interest does it appear Ms. Watt recused herself (belatedly and without legal effect to

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<sup>2</sup> The County of Los Angeles responded to these comments, and specifically addressed and contradicted the analysis of the mitigation and prioritization concepts contained in the June administrative draft AVRCIS. This contradiction is even more forceful in light of the fact there is no pending draft AVRCIS, let alone a complete and approved study. Further, Los Angeles County has similarly objected multiple times to inclusion of “economic opportunity areas” within the approved Antelope Valley Area Plan (AVAP), adopted by the Los Angeles County Board of Supervisors. The AVAP was challenged by the Center for Biological Diversity, but Los Angeles prevailed entirely, resulting in an appellate court decision upholding the AVAP and its environmental analysis. Most recently, Los Angeles County submitted a letter to DMCA reiterating its objections, which is included with this letter as Attachment 4.

the prejudice already created and which permeates the AVRCIS process to this date, we might add). Recent correspondence from Ms. Watt is an admission of this conflict. See Attachment 3.

These blatant conflicts of interest do not appear to have been disclosed to the DMCA, DFW or others. Governmental decisions, such as DMCA’s decision to act as the “public agency” submitting the AVRCIS or its decision to approve a draft AVRCIS, or such as DFW’s decision to approve an RCIS should not involve the participation of such heavily self-interested individuals or groups. Allowing a study to proceed that was tainted at its formative stage, and continuing through the majority of the work being conducted, by these conflicts poses grave public ethics concerns; these concerns cannot be resolved at this late stage by the recusal of those conflicted individuals and groups.

3. The AVRCIS Must be Revised to Reflect the Commitments Made to Tejon Ranch

On May 8, 2019, Tejon Ranch learned that the DMCA submitted the February 2019 Draft AVRCIS to the DFW. At that time, Tejon Ranch also learned that the Santa Monica Mountains Conservancy (which itself negatively commented on the Centennial project that was approved by the Los Angeles County Board of Supervisors) acted to become the “state sponsor” of the AVRCIS (pursuant to Fish & Game Code § 1850(a)).

Until it received the agenda for the May 8<sup>th</sup> DMCA meeting, Tejon Ranch was unaware of any ongoing activity pertaining to the AVRCIS. In fact, we had been told that the AVRCIS process was on an indefinite hold. So, we were grateful that DFW provided a copy of the February 2019 Draft AVRCIS to us. Upon review of this draft, it became clear that commitments made by those preparing the AVRCIS to *entirely* remove Tejon Ranch from the AVRCIS had not been honored.

In August and September of 2017, Tejon Ranch communicated its demand to be removed from not just the AVRCIS study area but also from the purported scientific modeling and mitigation priority analysis. As stated in our September 5, 2017 letter to the DMCA and the AVRCIS Steering Committee:

Tejon Ranch understands the AVRCIS will now (and in any future version prepared by DMCA) exclude any reference or depiction of Tejon Ranch lands as being within the AVRCIS study area, and will exclude any discussion of Tejon Ranch lands from substantive analysis. It is our further understanding that any modeling used in the AVRCIS is being revised to account for exclusion of Tejon Ranch lands and such revised modeling will not include discussion, depiction, analysis or reference to Tejon Ranch lands. (See Attachment 5.)

The aforementioned statement confirming our understanding was based on *written representations* from DMCA representatives on August 15, 2017 stating that, following “consulting with the AV RCIS steering committee, ICF will be removing Tejon Ranch from the AV RCIS study area . . . .” (See Attachment 6.) Thereafter, on September 18, 2017, Graham Chisolm, a primary author and consultant of DMCA for the AVRCIS, *confirmed in writing* Tejon Ranch’s understanding:

[T]he steering committee was comfortable with the recommendation to remove Tejon Ranch from the draft Antelope Valley Regional Conservation Investment Strategy (AVRCIS). ICF International is modifying the draft AVRCIS in order to implement the recommendation, *including removing references to the Tejon Ranch from the draft AVRCIS’ narrative analysis and maps.* (See Attachment 7 (emph. supp.).)

Thus, Tejon Ranch not only understood, but detrimentally relied on, the written commitments of DMCA and AVRCIS proponents that the next version of the AVRCIS would not include Tejon Ranchlands in the AVRCIS study area *and* would not include any mapping overlay on Tejon Ranch lands.

To our surprise the February 2019 Draft AVRCIS demonstrates that DMCA and those preparing the AVRCIS did not honor their written commitments.<sup>3</sup> Tejon Ranch strongly urges DFW, DMCA and those preparing the AVRCIS to consider taking immediate steps to remove all mapping, depiction, visualization and other analysis or narrative from Tejon Ranch lands. In this case, Tejon Ranch has and is undertaking significant activity and incurring costs in relation to the planning and development of the Centennial project in reliance of the prior commitment that Tejon Ranch is being *entirely* removed from the AVRCIS. Not abiding by DMCA's commitment creates significant risk to DFW, DMCA and those preparing the AVRCIS. (*See HPT IHG-2 Properties Trust v. City of Anaheim* (2015) 243 Cal.App.4th 188.)

#### 4. Other Infirmities Plague the AVRCIS Process, Rendering it Unlawful

The process to prepare and submit *any version* of the AVRCIS has been tainted by violations of state law. Without fully cataloguing these violations, which we reserve our right to do at a later date, there are several concerns that call into question the AVRCIS process to date and which preclude DFW from taking any action on the current AVRCIS.

First, *only* a public agency has statutory authority to “propose”, “develop”, “create” or “submit” an RCIS for DFW’s consideration. (Cal. Fish & Game Code §§ 1852(a), 1854(c).) The statute does not contemplate or authorize the preparation of an RCIS by private parties. Nor does the statute contemplate or authorize private party preparation of an RCIS to avoid compliance with applicable law, such as governmental transparency statutes found in the Brown Act, the Public Records Act or the Political Reform Act.<sup>4</sup> (*Compare*, Cal. Fish & Game Code § 1854(c) subdiv. (3)(A) *with* (D) (speaking to circumstances for holding a meeting where a “public agency proposing a strategy” has initiated an RCIS either before or following January 1, 2017).) For similar reasons, the statute does not permit private preparation of an RCIS, which is later “adopted” by a public agency in an effort to skirt applicable laws.

Notwithstanding the clear statutory requirement that an RCIS be developed, created and submitted by a public agency, the AVRCIS process did not involve the required public agency sponsorship until September 13, 2017 – at which time DMCA’s governing body acted, *for the first time*, to interject itself as the sponsor of the AVRCIS.<sup>5</sup>

The agenda for the September 13, 2017 regularly scheduled meeting of the DMCA included an item to officially (*and for the first time*) authorize DMCA to be the “sponsor” for the AVRCIS and to authorize submittal of “an AVRCIS” to the Department. As part of a staff report and discussion on this agenda item, staff for DMCA stated that (a) the AVRCIS process to that date had been purely private in nature and (b) it was the intention of those actually preparing the AVRCIS to avoid public scrutiny of their work

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<sup>3</sup> Numerous maps in the February 2019 Draft AVRCIS continue to include purported scientific modeling and mitigation prioritization overlaid on Tejon Ranch lands. As examples, attached hereto at Attachment 8 are several maps from the February 2019 Draft AVRCIS. These maps, all other maps, and any other narrative or analysis must be revised to remove any such overlay from Tejon Ranch lands.

<sup>4</sup> Based on analysis to date by Tejon Ranch, including review of records provided by DMCA, we believe that the AVRCIS process has encountered violations of all three of these statutes. As examples, this letter identifies conflicts of interest in those who have participated in preparing the AVRCIS. For the time being we reserve our rights with respect to these issues. It does bear noting, however, that each of these statutes includes private attorney general provisions and the ability to seek advice from (or bring complaints to) other independent state agencies.

<sup>5</sup> Prior to this September 13, 2017 meeting, the DMCA governing board only received two briefings on the “regional conservation framework” (the precursor to the RCIS process, which precursor had no basis in statute) and acted to receive a grant to assist with the RCF. At no time did the DMCA governing board, prior to September 13, 2017, take any action that could remotely be viewed as authorizing sponsorship, creation or preparation of the AVRCIS.

product until it was submitted to the Department. A full transcript of the September 13, 2017 meeting has been prepared by Tejon Ranch from audio files provided by DMCA. This transcript can be provided to DFW later, if needed. However, those statements made at the September 13, 2017 meeting that are germane to demonstrating the *intentional* desire to maintain secrecy are as follow:

Mr. Edelman: “But right now, it's a private document that's moving forward through this planning team hired by Bechtel and the Windward Foundation.” (Minute 21:58)

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Mr. Edelman: “Since you haven't seen the final draft of it, and that the people who are preparing it don't want that final draft to go public until it goes to the Department of Fish and Wildlife, that you could make it so that the chair could get final approval of it, potentially to... Before it gets submitted to Fish and Wildlife.” . . . . “But that the planning team really thought it would be better, and move the process along farther, if it could go to that stage without being widely distributed public wide.” (Minute 34:40.)

Against this factual background, it is also important to note that the February 2019 Draft AVRCIS inaccurately represents to DFW that the AVRCIS process was initiated by DMCA in 2016 – which it was not. The February 2019 Draft AVRCIS states, the “Antelope Valley RCIS development process began in March 2016.” (February 2019 Draft AVRCIS at § 1.4.2.) The February 2019 Draft AVRCIS goes on to claim that “[t]he process was initiated by the Desert and Mountains Conservation Authority (DMCA) in collaboration with the California Energy Commission (CEC).” (*Ibid.*) This statement is not accurate.

The DMCA governing board did not meet at all in 2015 and only met twice in 2016. The only two meetings of the DMCA governing board occurred *after* March of 2016, on June 15, 2016 and on September 9, 2016. (See [http://dmca.ca.gov/agenda\\_archive.asp](http://dmca.ca.gov/agenda_archive.asp).) Furthermore, neither of the meetings held in 2016 by the DMCA governing board created a “DMCA Steering Committee” or took any action to authorize or “initiate” preparation of the AVRCIS.<sup>6</sup>

Comparing (1) the action taken at the DMCA’s September 13, 2017 meeting, the quoted statements of DMCA staff at this meeting describing the secretive nature of the AVRCIS process to date, and the omission of DMCA taking *any* action whatsoever until September 13, 2017 to become the “sponsoring” public agency for the AVRCIS with (2) the statements made in the February 2019 Draft AVRCIS, which are patently inaccurate, is itself sufficient basis to reject any further effort to process the AVRCIS.<sup>7</sup>

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<sup>6</sup> The June 15, 2016 DMCA governing board meeting included several agenda items pertaining to a “regional conservation framework” for the Antelope Valley, and consideration of a resolution accepting grant funding for involvement in the “regional conservation framework” See [http://smmc.ca.gov/Agendas\\_DMCA/agenda\\_527.pdf](http://smmc.ca.gov/Agendas_DMCA/agenda_527.pdf) (agenda); [http://smmc.ca.gov/Agendas\\_DMCA/minute\\_527.pdf](http://smmc.ca.gov/Agendas_DMCA/minute_527.pdf) (minutes). The September 9, 2016 DMCA governing board meeting included consideration of a resolution supporting AB 2087, which legislation created the regional conservation investment strategy process. See [http://smmc.ca.gov/Agendas\\_DMCA/agenda\\_534.pdf](http://smmc.ca.gov/Agendas_DMCA/agenda_534.pdf) (agenda); [http://smmc.ca.gov/Agendas\\_DMCA/minute\\_534.pdf](http://smmc.ca.gov/Agendas_DMCA/minute_534.pdf) (minutes).

<sup>7</sup> As noted above, only a public agency has statutory authority to “propose”, “develop”, “create” or “submit” an RCIS to the Department for consideration. Cal. Fish & Game Code §§ 1852(a), 1854(c). The statute does not contemplate, let alone authorize the preparation of an RCIS by private parties who, at some later date and time, then “forum shop” an RCIS to a public agency that later enters the process to serve as the nominal public agency sponsor. Such a charade not only contradicts the Fish & Game Code (*compare*, § 1854(c) subdiv. (3)(A) with (D) [describing circumstances for holding a meeting where a “public agency proposing a strategy” has initiated an RCIS either before or following January 1, 2017]), but such shenanigans run afoul of, if not are a blatant affront to, basic

Second, unless a public agency initiated a RCIS before January 1, 2017, the public agency must first publish a notice of intent to create an RCIS and file such notice with the Office of Planning and Research and the county clerk of counties where the RCIS is found. (Cal. Fish & Game Code § 1854(c)(1); *see also* Govt. Code § 6040 (specifying method of publication applicable to all public agency publication obligations).) DMCA, as the sole public agency that has initiated this activity to create the AVRCIS (which it did not do until September 13, 2017) has not complied with this requirement. Nor, as summarized above, does Tejon Ranch believe the statute authorizing creation of RCIS permit private third parties to prepare these studies on their own for later submittal to DFW.

Specifically, in this regard, Tejon Ranch made a public records request seeking proof of publication and a copy of this required notice. Tejon Ranch sought: “The notice of intention to create the AVRCIS published by DMCA (as provided and required by Fish & Game Code § 1854(c)(1)). . . . Proof of publication for the notice of intention referenced in Item 2 above in an adjudicated newspaper of general circulation. See Gov. Code § 6041. . . . Proof of filing of the notice referenced in Item 2 above with the Governor’s Office of Planning and Research and the County Clerk of Los Angeles County (as provided and required by Fish & Game Code § 1854(c)(1)).” No responsive documents were provided by DMCA to Tejon Ranch. Thus, the requirements of Fish & Game Code § 1854(c)(1) were not complied with.

For these and other reasons DFW lacks statutory authority to act on the AVRCIS. As also discussed, at a minimum, Tejon Ranch lands must be removed from all purported scientific modeling and/or mitigation prioritization descriptions or visualizations contained in the AVRCIS. Further, the study itself is flawed as a result of the participation of those with self-serving interest in its contents, including those who participated in the process to gain litigation advantage over land-owners.

Very Truly Yours,



Michael R.W. Houston  
Senior Vice President, General Counsel & Secretary

cc: Mr. Charlton H. Bonham (*via electronic mail*)  
Desert & Mountain Conservation Authority (*via electronic mail*)  
Santa Monica Mountains Conservancy (*via electronic mail*)  
Mr. Graham Chisolm (*via electronic mail*)  
Resource Groups (*via electronic mail*)

Attachments:

1. May 1, 2008, Letter from California environmental agencies in support of Ranchwide Agreement
2. September 18, 2019, Email exchange between California Native Plant Society members and state agency representatives
3. May 15, 2019, Email from Ms. Watt
4. May 7, 2019, Letter from Los Angeles County to DMCA (with additional attachments)
5. September 5, 2017, Letter from Tejon Ranch to the DMCA and the AVRCIS Steering Committee
6. August 15, 2017, Email from AVRCIS representative to Tejon Ranch
7. September 18, 2017, Email from Mr. Chisolm to Tejon Ranch
8. Examples of depictions in February 2019 Draft AVRICS

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principles of governmental transparency, open record keeping, conflicts of interest and due process that apply to public agency operations.

**Attachment 1**

May 1, 2008, Letter from California environmental agencies in support of Ranchwide Agreement

## EXHIBIT R

### Resource Agency Letter re Mitigation



*California Environmental  
Protection Agency*



May 1, 2008

Mr. Robert A. Stine  
President & CEO  
Tejon Ranch Company  
4436 Lebec Road  
Lebec, CA 93243

Dear Mr. Stine:

As you know, representatives of the Tejon Ranch Company (TRC) have had a number of meetings with California Resources Agency staff to discuss TRC's long-term plans for conservation and development of the 270,000-acre Tejon Ranch (Ranch). TRC has also met with the California Environmental Protection Agency to discuss the outline of TRC's project plans. Because of the exceptional natural resource values of the Ranch, both of our agencies have been delighted to learn that you have worked with various environmental groups (Resource Groups) to develop a conservation and land use agreement (Ranchwide Agreement) that identifies and designates planned conservation areas (Conserved Areas), planned development areas (Developed Areas) and the permitted activities within those areas. As it has been described to us, the Ranchwide Agreement would foster the orderly conservation and development of the Ranch and provide for the permanent conservation of almost 90 percent of the Ranch. We understand that the Ranchwide Agreement is at a conceptual level at this time, but that you expect to have final agreement with environmental groups sometime in early May.

In connection with the proposed Ranchwide Agreement, we understand that TRC is seeking policy level recognition of this historic accord from State and Federal agencies and departments. The purpose of this letter is to provide that policy recognition exclusively in relation to this planned transaction for the Ranch.

Because of the unique factors involved in this project, this policy recognition is not intended to, and does not, serve as precedent for lands other than those within the Ranch.

To that end, we offer the following policy statements in support of the Ranchwide Agreement:

Mr. Robert A. Stine  
May 1, 2008  
Page 2

- Based on your description of the Ranchwide Agreement, we understand that of the approximately 270,000 acres comprising the Ranch, the Ranchwide Agreement would provide for the permanent preservation of at least 178,000 acres and for the option to preserve an additional 62,000 acres through the purchase of conservation easements, or potentially fee title, for an anticipated total of approximately 240,000 acres, or almost 90 percent of the total Ranch acreage. Because of the many unique factors noted above, including the sheer magnitude of this conservation effort and the significant resource values attributed to this property, and in viewing the 240,000 acres in the Conserved Areas in a holistic manner, we expect that TRC will be allowed to use those Conserved Areas and corresponding natural resource values associated with these Conserved Areas to meet the land conservation and corresponding natural resource mitigation requirements for and the planned development and other activities within the Developed Areas, including the designated planned development projects of Tejon Mountain Village, Centennial and Grapevine, subject to potential limitations for Conserved Areas acquired using public funds as described below.
- Though actual mitigation requirements for the planned development and other activities within the Developed Areas cannot be known prior to regulatory review, given the large amount and high natural resource values in these Conserved Areas, we do not anticipate that TRC would be required to acquire or use lands outside of Ranch property to satisfy natural resource mitigation requirements. Only after a full evaluation of these lands, and a determination is made that the required mitigation can not be found on the Ranch, would we look outside the Ranch for mitigation.
- For portions of the Conserved Areas that are permanently preserved by conservation easements, or potentially fee title, acquired using public funds, the use of these lands for mitigation purposes would not be allowed unless the potential mitigation use of these lands is taken into account in the price paid and unless mitigation uses are allowed by applicable laws including those governing the public funding source(s) used to fund the acquisition.
- In order to provide an integrated and comprehensive approach to the management of lands and resources within the Conserved Areas, we understand that the parties have agreed to create an independent conservancy (Tejon Conservancy) as part of the Ranchwide Agreement. Provided that the Tejon Conservancy meets applicable legal requirements for holding mitigation land and conservation easements and assuming corresponding long-term mitigation monitoring and other mitigation obligations, the Tejon Conservancy could serve as the appropriate and preferred entity to hold conservation easements and/or title to mitigation lands granted by TRC, and to manage those lands, subject to regulatory requirements imposed pursuant to project permitting for the Developed Areas.

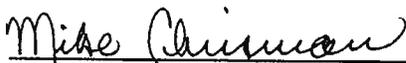
Mr. Robert A. Stine  
May 1, 2008  
Page 3

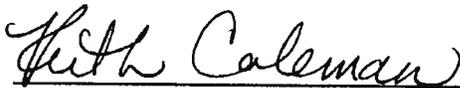
- We appreciate the commitment of TRC and the Resource Groups to work with California State Parks and other stakeholders toward creation of a State Park within the Ranch. A large park, extending from the Mojave Desert, across the Tehachapi Mountains, and into the grasslands of Tejon Valley, would be an extraordinary addition to California's state park system, providing meaningful public access to the Tehachapi Mountains. The Tejon Conservancy would be a valued partner in planning and supporting this State Park.

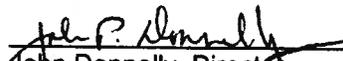
This letter is intended to set forth policy statements in support of the Ranchwide Agreement. As specific projects are proposed, TRC and other parties engaged in the planned development or other activities on the Ranch will be required to apply for and obtain all permits, licenses and approvals required under applicable law, including compliance with the California Environmental Quality Act and all other state laws. Final determinations regarding permit and mitigation requirements for those activities will be decided by the appropriate agencies and departments as part of, and in accordance with, those processes.

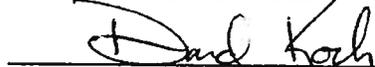
The policy statements in this letter presume that the terms of the final Ranchwide Agreement are substantially consistent with the above description and will in fact be reached. If, for some reason, TRC and the environmental groups are unable to reach a final agreement, we expect that TRC will notify us. Again, we applaud the Tejon Ranch Company for working to reach such a significant and historic agreement to address the long-term future of Tejon Ranch.

Sincerely,

  
Mike Chrisman, Secretary for Resources

  
Ruth Coleman, Director  
California State Park

  
John Donnelly, Director  
Wildlife Conservation Board

  
Don Koch, Director  
Department of Fish and Game

  
Linda Adams, Secretary for  
Environmental Protection

  
Tam Doduc, Chair, State Water  
Resources Control Board

**Attachment 2**

September 18, 2019, Email exchange between California Native Plant Society members and state agency representatives



o: 916-538-2452  
c: 805-598-9350  
e: [alfredo@priorityca.com](mailto:alfredo@priorityca.com)

On Tue, Sep 18, 2018 at 5:25 PM, Rabinowitsh, Nicholas@ARB <[Nicholas.Rabinowitsh@arb.ca.gov](mailto:Nicholas.Rabinowitsh@arb.ca.gov)> wrote:  
All – yes, 10-1 range works for me. Let me know what specific time works best for you all. Thanks!

Nick Rabinowitsh  
Senior Attorney  
California Air Resources Board, Legal Office  
Tel: (916) 322-3762

**From:** Greg Suba <[gsuba@cnps.org](mailto:gsuba@cnps.org)>  
**Sent:** Tuesday, September 18, 2018 4:07 PM  
**To:** Nick Jensen <[njensen@cnps.org](mailto:njensen@cnps.org)>  
**Cc:** Alfredo Arredondo <[alfredo@priorityca.com](mailto:alfredo@priorityca.com)>; Rabinowitsh, Nicholas@ARB <[Nicholas.Rabinowitsh@arb.ca.gov](mailto:Nicholas.Rabinowitsh@arb.ca.gov)>  
**Subject:** Re: Request for Meeting Re: CEQA Mitigation and Offsets

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

I'm available Friday from 10am-1pm, then otherwise in transit to/from Bay Area with spotty phone service (Amtrak).

If 10-1 works, then I'll join. If a time outside that is necessary, I'm happy to catch up with Nick (J) and Alfredo afterwards.

Greg

On Tue, Sep 18, 2018 at 4:04 PM, Nick Jensen <[njensen@cnps.org](mailto:njensen@cnps.org)> wrote:  
My schedule on Friday afternoon is pretty open. Greg-how about you?

Thanks,  
Nick

On Tue, Sep 18, 2018 at 3:49 PM, Alfredo Arredondo <[alfredo@priorityca.com](mailto:alfredo@priorityca.com)> wrote:  
Hello Nick,

Friday afternoon would work on my end. I am copying Greg and Nick with CNPS as well to see what their availability is. Thanks for your time.

/Alfredo Arredondo  
**Priority Strategies**

1225 8th St., Suite 375  
Sacramento, CA 95814  
o: 916-538-2452  
c: 805-598-9350  
e: [alfredo@priorityca.com](mailto:alfredo@priorityca.com)

On Tue, Sep 18, 2018 at 2:40 PM, Rabinowitsh, Nicholas@ARB <[Nicholas.Rabinowitsh@arb.ca.gov](mailto:Nicholas.Rabinowitsh@arb.ca.gov)> wrote:

Alfredo: Rajinder forwarded your email to me. I'd be happy to talk - would you be able to do a call on Friday? Perhaps in the afternoon? If so, what times work for you?

Thanks,

Nick Rabinowitsh  
Senior Attorney  
California Air Resources Board, Legal Office  
Tel: (916) 322-3762

---

**From:** Alfredo Arredondo <[alfredo@priorityca.com](mailto:alfredo@priorityca.com)>  
**Sent:** Tuesday, September 18, 2018 1:22:47 PM  
**To:** Sahota, Rajinder@ARB  
**Cc:** Greg Suba; Nick Jensen  
**Subject:** Request for Meeting Re: CEQA Mitigation and Offsets

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello Rajinder,

I am reaching out on behalf of my client, the CA Native Plant Society, to see if we can find a time this week to discuss a proposed development in Southern California, the Centennial Project, and their use of offsets from the Cap and Trade regulation in order to comply with CEQA requirements. Attached is the FEIR Supplement related to GHG emissions compliance for the project (link to additional documents for project available [here](#)) which is raising lots of eyebrows for us. In particular, on the third page they say the following:

"Approximately 96 percent (150,808 MTCO<sub>2</sub>e/yr) of the Updated GHG Calculations emissions are covered by, and subject to, the purchase of emission allowances under the new, expanded state Cap and Trade program approved

by the Legislature after the DEIR was issued, and signed into law in 2017 (Assembly Bill 398 [AB 398]). The Cap and Trade program was designed to comprehensively regulate fossil fuels (from "wells to wheels" – from production, through refining, through ultimate consumption) and is expected to raise gasoline prices within a range of approximately 15 to 63 cents per gallon by 2021, and from 24 to 73 cents per gallon by 2031, according to the non-partisan California Legislative Analyst Office.<sup>1</sup> Compliance with the Cap and Trade program was upheld as a lawful CEQA mitigation measure to reduce GHG emissions to a less-than-significant-level for fossil fuels used by a refinery project for both direct refinery operations as well as indirect electricity consumption-related GHG emissions in a recent CEQA appellate court case, *Association of Irrigated Residents v. Kern County Board of Supervisors, et al.* (Alon USA Energy, Inc., et al., Real Parties in Interest) (2017) 17 Cal.App.5th 708. The California Supreme Court declined to reverse, or de-publish, this case. The California Air Resources Board (CARB) has also determined that existing California law provides sufficient authority to extend the Cap and Trade program as required to meet state GHG reduction objectives.<sup>2</sup> See Table 3. "

This raises a lot of questions for us that we hope to get your insight on including:

- Is this type of compliance pathway for non-capped or non-covered entities like a housing developer truly the intent of the cap-and-trade mechanism?
- Are there other examples of a developer in the state using offsets in this way?
- Does the *Irrigated Residents v. Kern* case apply only to capped or covered entities or is the interpretation that this applies to any entity, regulated or not, correct?

I know that this is a lot of information, but I figure that having a conversation with you about this will help clear things up for us. Please let me know if there are some times that work for you this week. Greg Suba, copied on the message, is based in Sacramento, but Nick Jensen, is based in Southern California and could join by phone if possible.

Thanks for your time, and I look forward to reconnecting soon.

/Alfredo Arredondo

**Priority Strategies**

1225 8th St., Suite 375

Sacramento, CA 95814

o: 916-538-2452

c: 805-598-9350

e: [alfredo@priorityca.com](mailto:alfredo@priorityca.com)

--

Nick Jensen, PhD

Southern California Conservation Analyst

California Native Plant Society

1500 North College Ave

Claremont, CA 91711

[njensen@cnps.org](mailto:njensen@cnps.org)

(530) 368-7839

--

/Alfredo Arredondo

**Priority Strategies**

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c: 805-598-9350

e: [alfredo@priorityca.com](mailto:alfredo@priorityca.com)

--

Nick Jensen, PhD

Southern California Conservation Analyst

California Native Plant Society

1500 North College Ave

Claremont, CA 91711

[njensen@cnps.org](mailto:njensen@cnps.org)

(530) 368-7839

**Attachment 3**

May 15, 2019, Email from Ms. Watt

**From:**  
**To:** FW: Antelope Valley RCIS Matter  
**Subject:** Monday, May 20, 2019 12:24:15 PM  
**Date:**

---

**From:** Terry Watt <[terryjwatt@](mailto:terryjwatt@)>  
**Date:** May 15, 2019 at 1:16:03 AM GMT+2  
**To:** "Gary Hunt" <[ghunt@](mailto:ghunt@)>  
**Cc:** "Dan Silver" <[dsilverla@](mailto:dsilverla@)>, "Reynolds, Joel" <[jreynolds@](mailto:jreynolds@)>, <[terryjwatt@](mailto:terryjwatt@)>  
**Subject:** Antelope Valley RCIS Matter

Gary,

This email is to inform you that I withdrew from any and all involvement in the Antelope Valley RCIS well over a year ago when the Ranch brought its concerns to the attention of the Tejon Ranch Conservancy Board.

Terry Watt

[TerryJWatt@](mailto:TerryJWatt@)

Please update your contacts

**Attachment 4**

May 7, 2019, Letter from Los Angeles County to DMCA (with additional attachments)



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](mailto:Diane.sacks@mrca.ca.gov)  
[Spencer.eldred@mrca.ca.gov](mailto:Spencer.eldred@mrca.ca.gov)  
[Info@dmca.gov](mailto: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.<sup>1</sup>

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

<sup>1</sup> 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

Attachment: ATTACHMENT B - Written Comments from the August 24, 2021 Public Hearing (SoCal Greenprint Update)



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](mailto: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.

Attachment: ATTACHMENT B - Written Comments from the August 24, 2021 Public Hearing (SoCal Greenprint Update)

Sincerely,

DEPARTMENT OF REGIONAL PLANNING  
Dennis J. Slavin  
Acting Director



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](mailto: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

HOA.101770195.1

Attachment: ATTACHMENT B - Written Comments from the August 24, 2021 Public Hearing (SoCal Greenprint Update)

**Attachment 5**

September 5, 2017, Letter from Tejon Ranch to the DMCA and the AVRCIS Steering Committee



September 5, 2017

Via Electronic Mail (michelle.osborn@icf.com)

Antelope Valley RCIS Steering Committee  
Attn.: Michelle Osborn  
630 K St. Suite 400  
Sacramento, CA 95814

Via Electronic Mail (edelman@smmc.ca.gov)

Desert & Mountain Conservation Authority  
Attn.: Paul Edelman  
44811 N. Date Ave., Suite G  
Lancaster, CA 93534

Via Electronic Mail (spencer.eldred@mrcg.ca.gov)

Desert & Mountain Conservation Authority  
Attn.: Spencer Eldred, Staff Counsel  
44811 N. Date Ave., Suite G  
Lancaster, CA 93534

**Re: Antelope Valley – Regional Conservation Investment Strategy (AVRCIS)  
Confirmation of Removal from AVRCIS Study Area**

Dear Ms. Osborne and Messrs. Edelman and Eldred:

This letter is sent in reference to my August 4, 2017 correspondence (copy enclosed), which requested the exclusion of Tejon Ranch’s lands from the AVRCIS and the AVRCIS study area.

The necessity of exclusion, and reasons therefor, is comprehensively described in the attached communication. Additionally, since that previous letter’s transmittal, audio tapes of a 2016 Steering Committee public outreach meeting have come to our attention. These audio tapes evidence Tejon Ranch representatives requesting, on the record, exclusion from the study area. At no time after that Steering Committee meeting did DMCA or the Steering Committee inform Tejon Ranch that this request would not be honored. In fact, and to the contrary, prior to dissemination of the administrative draft AVRCIS, we were lead to believe that such request would be honored. It was only after dissemination of the draft AVRCIS that Tejon Ranch learned its request was disregarded, without explanation. Initial responses by DMCA representatives to Tejon Ranch’s subsequent questioning of the circumstances leading to inclusion of Tejon Ranch lands in the draft document were, unfortunately, unclear, contradictory and lacking in transparency.

Following transmittal of my attached August 4, 2017 letter, discussions occurred with representatives of the Desert and Mountains Conservation Authority (DMCA), which is the purported applicant and “public agency” sponsor for the AVRCIS. See Cal. Fish & Game Code § 1852(a); see also AVRCIS at p. 1-4. These discussions culminated on August 25, 2017. At that time DMCA representatives definitively and without equivocation informed Tejon Ranch representatives in writing that, following “consulting with the AV RCIS steering committee, ICF will be removing Tejon Ranch from the AV RCIS study area . . . .”

P.O. Box 1000 | 4436 Lebec Road  
Tejon Ranch, CA 93243  
661 248 3000 O | 661 248 3100 F  
[www.tejonranch.com](http://www.tejonranch.com)

Tejon Ranch Co. (NYSE:TRC)—a diversified real estate development and agribusiness company.

Tejon Ranch has and continues to rely on this representation and has communicated this representation to third parties, including to state resource agency representatives. For instance, Tejon Ranch is undertaking significant activity and incurring costs in relation to the planning and development of the Centennial project in reliance of the representation that Tejon Ranch is being “removed . . . from the AV RCIS study area.” See *HPT IHG-2 Properties Trust v. City of Anaheim* (2015) 243 Cal.App.4<sup>th</sup> 188. Based on this communication from DMCA’s representatives, Tejon Ranch understands the AVRCIS will now (and in any future version prepared by DMCA) exclude any reference or depiction of Tejon Ranch lands as being within the AVRCIS study area, and will exclude any discussion of Tejon Ranch lands from substantive analysis. It is our further understanding that any modeling used in the AVRCIS is being revised to account for exclusion of Tejon Ranch lands and such revised modeling will not include discussion, depiction, analysis or reference to Tejon Ranch lands.

Should any our understandings on which we are relying be contrary to your understanding, we request an immediate response so that we can take appropriate actions, as we deem necessary, to protect Tejon Ranch’s interests.

On a separate but related topic, we are aware of correspondence from Los Angeles County requesting the AVRCIS study area exclude all economic opportunity areas (“EOAs”) designated in the Antelope Valley Area Plan. We fully support the County’s request for the reasons contained in their letter, and for full exclusion of the western EOA.

Should you have any questions, do not hesitate to contact me. I can be reached at 661-663-4230.

Very Truly Yours,



Michael R.W. Houston,  
Senior Vice President, General Counsel & Secretary

Cc: Elaine Lemke, Esq. (via electronic mail - [elemke@counsel.lacounty.gov](mailto:elemke@counsel.lacounty.gov))  
Jennifer Hernandez, Esq. (via electronic mail)  
Terry Watt (via electronic mail - [terryjwatt@gmail.com](mailto:terryjwatt@gmail.com))  
Chris Beale, Esq. (via electronic mail - [cbeale@resourceslawgroup.com](mailto:cbeale@resourceslawgroup.com))  
Clients

Enclosure

**Attachment 6**

August 15, 2017, Email from AVRCIS representative to Tejon Ranch

**From:** [CBeale@ Jennifer.Hernandez@](mailto:CBeale@Jennifer.Hernandez@)  
**To:** AV RCIS study area  
**Subject:** Tuesday, August 15, 2017 1:57:22 PM  
**Date:**

---

Jennifer, after consulting with the AV RCIS steering committee, ICF will be removing Tejon Ranch from the AV RCIS study area, as requested by Tejon Ranch.

**Chris Beale**

RESOURCES LAW GROUP, LLP  
555 CAPITOL MALL, SUITE 1090  
SACRAMENTO, CA 95814  
916.442.4880  
916.442.4193 (FAX)  
[cbeale@](mailto:cbeale@)  
[www.resourceslawgroup.com](http://www.resourceslawgroup.com)

This email may contain confidential or privileged information, or attorney work product. Only the intended recipient may disclose, copy, distribute, or otherwise use its contents or attachments. If you received this email in error, please contact Chris Beale immediately at the telephone number or email address above.

**Attachment 7**

September 18, 2017, Email from Mr. Chisolm to Tejon Ranch

**From:** [Graham Chisholm](#)  
**To:** [jennifer.hernandez@](mailto:jennifer.hernandez@); [ghunt@](mailto:ghunt@)  
**Cc:** [Michael Houston](#); [Paul Edelman](#); [Spencer Eldred](#); [elemke@](mailto:elemke@); [scoleman@](mailto:scoleman@) Tejon Ranch & the Antelope Valley RCIS  
**Subject:** Monday, September 18, 2017 7:45:59 AM  
**Date:**

---

Jennifer and Gary,

This follows up on our August 14th call, on which we shared that we would be taking a recommendation to remove the Tejon Ranch from the RCIS to the RCIS steering committee and that Chris Beale would let Jennifer know the recommended action.

Chris Beale confirmed with me that he spoke with Jennifer on August 18th and let her know that the steering committee was comfortable with the recommendation to remove Tejon Ranch from the draft Antelope Valley Regional Conservation Investment Strategy (AVRCIS). ICF International is modifying the draft AVRCIS in order to implement the recommendation, including removing references to the Tejon Ranch from the draft AVRCIS' narrative analysis and maps.

When the draft AVRCIS is submitted to CDFW for review it will not include the Tejon Ranch.

Thanks and with regards,

Graham Chisholm

Cc:

Paul Edelman

Elain Lemke

Starr Coleman

Michael Houston

GRAHAM CHISHOLM

Attachment: ATTACHMENT B - Written Comments from the August 24, 2021 Public Hearing (SoCal Greenprint Update)

**Senior Policy Advisor**

1100 11th Street, Suite 500|Sacramento, CA 95818|Mobile:



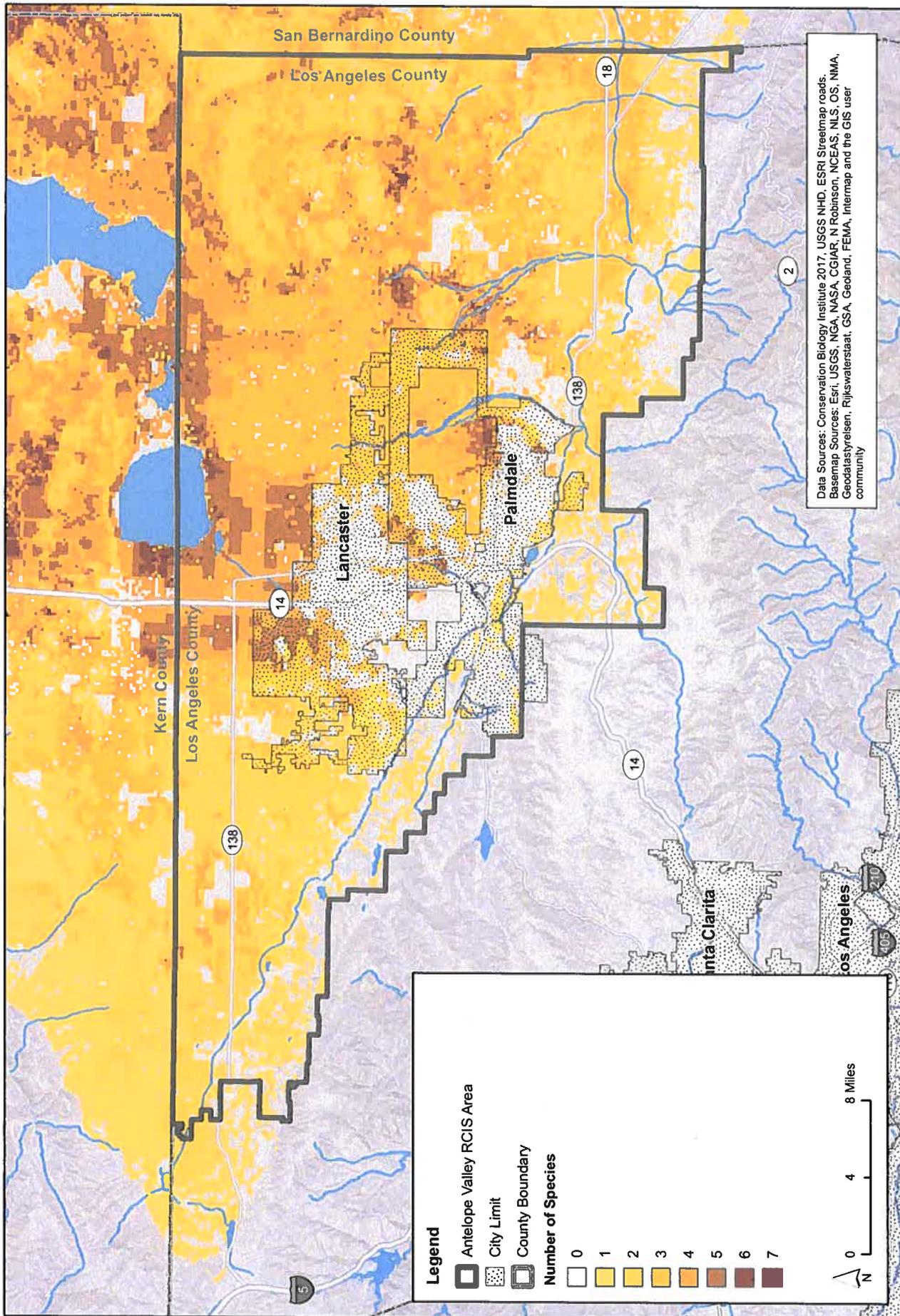
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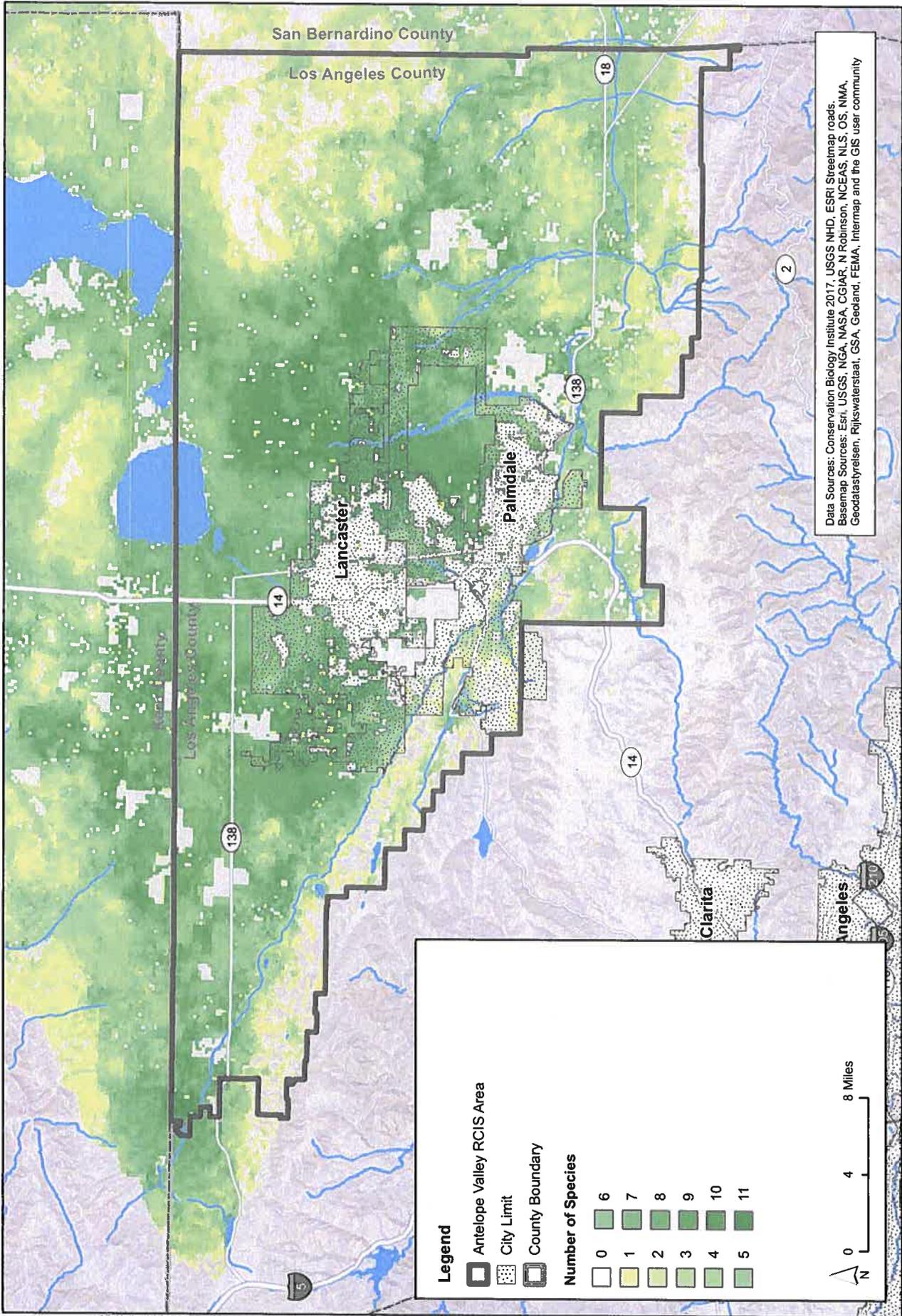
**Attachment 8**

Examples of depictions in February 2019 Draft AVRICS



**Figure 3-2**  
**Desert Species Group Composite Overlap of Distribution Models in the Antelope Valley RCIS Area**

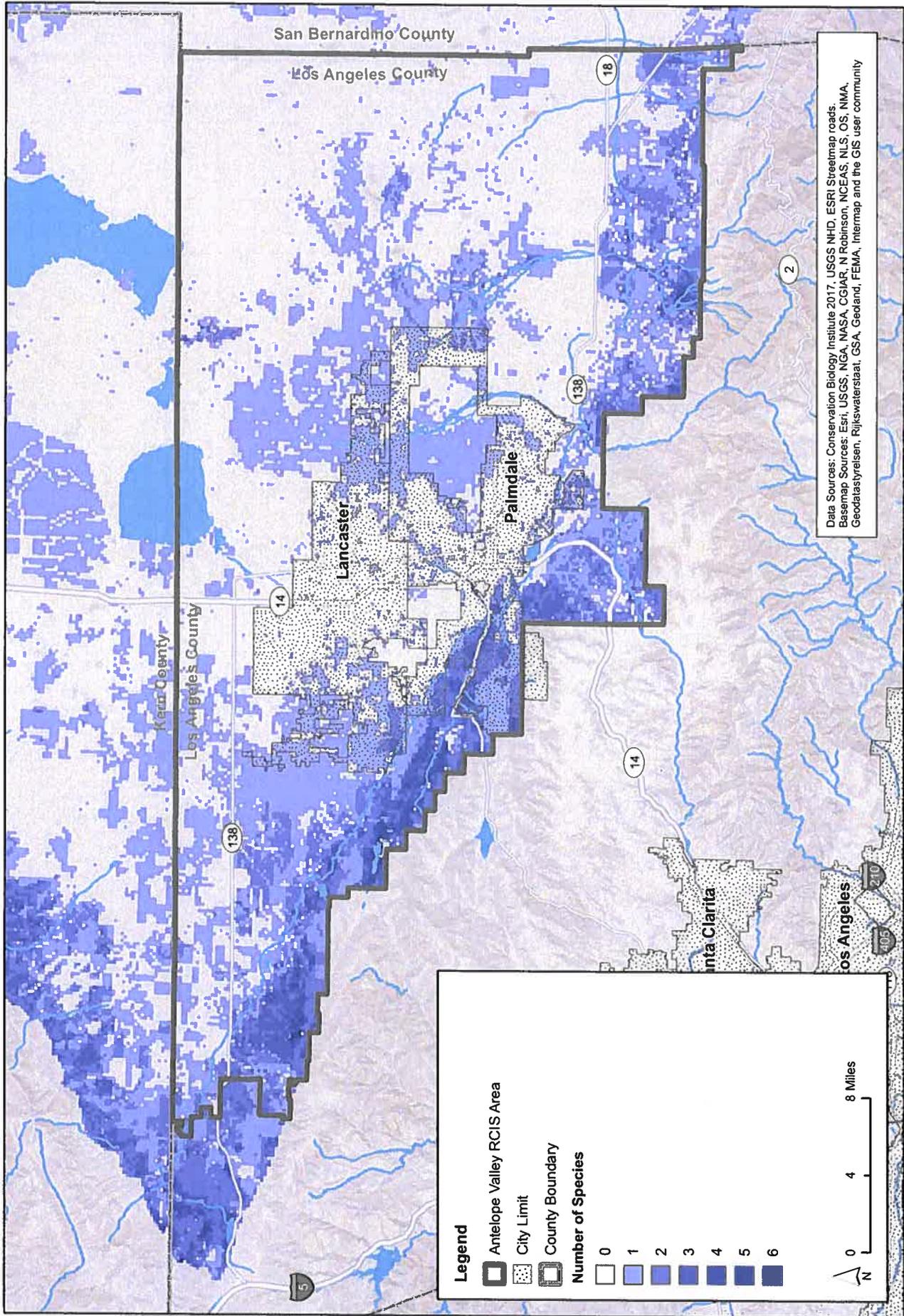




**Figure 3-3**  
Agriculture/Grassland Species Group Composite Overlap of Distribution Models in the Antelope Valley RCIS Area



Attachment: ATTACHMENT B - Written Comments from the August 24, 2021 Public Hearing (SoCal Greenprint Update)



**Figure 3-4**  
**Foothill/Riparian Species Group Composite Overlap of Distribution Models in the Antelope Valley RCIS Area**



**Attachment: ATTACHMENT B - Written Comments from the August 24, 2021 Public Hearing (SoCal Greenprint Update)**



525 S. Hewitt St.  
Los Angeles, CA 90013  
(213) 689-9707 [usgbc-la.org](http://usgbc-la.org)

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Seth Stronnin - ARI IP

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,

On Aug. 9, the International Panel on Climate Change announced new findings that climate change is widespread, rapid, and intensifying. While the report's findings were dire, the message was clear that proactive action today is needed to mitigate the increasing threats of climate change. We urge you to keep the SoCal Greenprint project on track to have it as an important asset in striving to build an economically vibrant and sustainable region.

We at the US Green Building Council-Los Angeles ([USGBC-LA](http://USGBC-LA)) work toward sourcing data, as well as educating and developing a greener economy via building a green workforce that includes 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.

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.

The SoCal Greenprint does not create new data or put new regulations in place. Instead, it makes it easy for the people who are planning the future of the region to understand how to best integrate nature into future growth and development. Here are a few examples: By understanding where existing infrastructure, such as sewage lines, are located, developers can see where it is cheaper and more efficient to build new projects. Knowing where groundwater sources are located can help developers understand how to incorporate water quality features into project designs, resulting

Attachment: ATTACHMENT B - Written Comments from the August 24, 2021 Public Hearing (SoCal Greenprint Update)

in community support for projects and ensuring that our vital natural resources are protected. City officials can use the data on tree canopies and the urban heat island effect to better understand where more trees are needed.

As potential users of the SoCal Greenprint, we applaud SCAG's leadership for making 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. 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.

We urge you to continue moving the SoCal Greenprint along and makes this invaluable resource available for all who are responsible for building a vibrant, healthier future for our region.

Sincerely,



**Ben Stapleton**  
Executive Director, USGBC-LA

525 S. Hewitt St.  
Los Angeles, CA 90013  
(213) 689-9707 [usgbc-la.org](http://usgbc-la.org)

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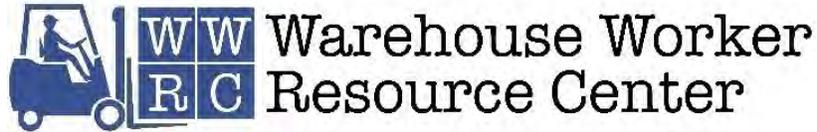
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UCLA Architecture and Urban Design

Laura Mask - Lennar Homes

Edmund Novy - Fondation Enfant Jesus

Marcela Oliva - LA Trade Tech

Seth Stronin - ARIIP



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 worker focus community center organization, we are reaching out 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.

There is no question that Southern California as a region will continue to expand and develop in the years to come. Southern California needs additional housing and transportation services to help it continue to be an economically vibrant region. Warehouse Worker Resource Center (WWRC) is a supporter of the SoCal Greenprint because it elevates existing data to help decision makers and stakeholders like ourselves understand how to best integrate nature into the future growth and development of the region.

The SoCal Greenprint is a tool that is in line with SCAG and the region's leadership in ensuring that our continued growth is done so in a sustainable way that prepares our communities for the climate challenges that lie ahead. The tool also ensures the legacy of development in Southern California is about advancing science and data in ways that will guide the development of healthy cities and places for all. As a region, Southern California is connected by watersheds, wildlife corridors, air quality issues and economic activity that is not constrained by jurisdictional boundaries. The SoCal Greenprint will help our organization and others overcome those boundaries to promote smart regional planning that also makes sense locally. We appreciate the opportunity to leverage the SoCal Greenprint's data to understand how to better plan and prepare for a collective future of growth and environmental leadership.

We appreciate the opportunity to express our support for the continued development of the SoCal Greenprint as part of the August 24 public hearing. We urge you to take the feedback collected to strengthen the tool and develop the resource we need for sustainable growth in Southern California.

Thank you,

*Mirella Deniz Z*

Mirella Deniz-Zaragoza

Research and Policy Coordinator

Warehouse Worker Resource Center

# Attachment C - SoCal Greenprint Proposed Data Layer List

SoCal Greenprint

Proposed Data Layers for Inclusion

July Version (update 2)

#	Theme	Data Name	Source	Description	Additional Information
1	Agriculture and Working Lands	Farmland Mapping and Monitoring Program	CA Department of Conservation	The Farmland Mapping and Monitoring Program (FMMP) produces maps and statistical data used for analyzing impacts on California's agricultural resources. Agricultural land is rated according to soil quality and irrigation status; the best quality land is called Prime Farmland. The maps are updated every two years with the use of a computer mapping system, aerial imagery, public review, and field reconnaissance.	<a href="https://www.conservation.ca.gov/dlrp/fmmp">https://www.conservation.ca.gov/dlrp/fmmp</a>
2	Agriculture and Working Lands	Soil Agricultural Groundwater Banking Index (SAGBI)	California Soil Resource Lab at UC Davis and UC-ANR	The Soil Agricultural Groundwater Banking Index (SAGBI) is a suitability index for groundwater recharge on agricultural land. The SAGBI is based on five major factors that are critical to successful agricultural groundwater banking: deep percolation, root zone residence time, topography, chemical limitations, and soil surface condition.	<a href="https://casoilresource.lawr.ucdavis.edu/sagbi/">https://casoilresource.lawr.ucdavis.edu/sagbi/</a>
3	Agriculture and Working Lands	Williamson Act	Counties	Williamson Act contracts	<a href="https://www.conservation.ca.gov/dlrp/wa">https://www.conservation.ca.gov/dlrp/wa</a> (Data available through request to each respective county in the SCAG region)
4	Agriculture and Working Lands	Crop Type	Department of Water Resources Crop Mapping 2016	For many years, DWR has collected land use data throughout the state and uses this information to develop water use estimates for statewide and regional planning efforts, including water use projections, water use efficiency evaluation, groundwater model development, and water transfers. These data are essential for regional analysis and decision making, which has become increasingly important as DWR and other state agencies seek to address resource management issues, regulatory compliance issues, environmental impacts, ecosystem services, urban and economic development, and other issues. Increased availability of digital satellite imagery, aerial photography and new analytical tools make remote sensing land use surveys possible at a field scale comparable to that of the California Department of Water Resources (DWR) historical field surveys. Current technologies allow accurate, large-scale crop and land use identification to be performed at time increments as desired, and make possible more frequent, comprehensive statewide land use information. Responding to this need, DWR sought expertise and support for identifying crop types and other land uses and quantifying crop acreages statewide using remotely sensed imagery and associated analytical techniques. Currently, Statewide Crop Maps are available for years 2014 and 2016. Historic County Land Use Surveys spanning 1986 - 2015 may also be accessed using the CADWR Land Use Data Viewer	<a href="https://data.cnra.ca.gov/dataset/statewide-crop-mapping">https://data.cnra.ca.gov/dataset/statewide-crop-mapping</a>
5	Agriculture and Working Lands	Community Gardens	SCAG	Locations of community gardens in the SCAG region.	<a href="https://scag.ca.gov/sustainability-program-green-region-initiative">https://scag.ca.gov/sustainability-program-green-region-initiative</a>
6	Agriculture and Working Lands	Agritourism Locations	UC Agriculture and Natural Resources	Farms, orchards, apiaries, creameries, wineries in the SCAG region	<a href="http://www.calagtour.org/region_search/south_coast/">http://www.calagtour.org/region_search/south_coast/</a>

Attachment: ATTACHMENT C - SoCal Greenprint Proposed Data Layer List (SoCal Greenprint Update)

**DRAFT**

# Attachment C - SoCal Greenprint Proposed Data Layer List

SoCal Greenprint

Proposed Data Layers for Inclusion

July Version (update 2)

#	Theme	Data Name	Source	Description	Additional Information
7	Agriculture and Working Lands/Water Resources	Projected Change in Climate Water Deficit	US Geological Survey	Climatic water deficit (CWD) quantifies evaporative demand exceeding available soil moisture and provides an estimate of drought stress on soils and plants. In a Mediterranean climate, climatic water deficit can also be thought of as a surrogate for water demand based on irrigation needs, and changes in climatic water deficit effectively quantify the supplemental amount of water needed to maintain current vegetation cover, whether natural vegetation or agricultural crops.	<a href="https://ca.water.usgs.gov/projects/reg_hydro/basin-characterization-model.html">https://ca.water.usgs.gov/projects/reg_hydro/basin-characterization-model.html</a>
8	Agriculture and Working Lands	Irrigation Capability Class	USDA - Soil Survey Geographic Database	Preserving prime agricultural lands and open space is a key statutory mandate of California's Local Agency Formation Commissions (Cortese-Knox Hertzberg Act 2000, Gov. Code §56301). Irrigation capability is a soil characteristic that classifies potential agricultural lands by the suitability of soils for most kinds of field crops. The soils are grouped according to their limitations for field crops, the risk of damage if they are used for crops, and the way they respond to management. Class I and II lands are statutorily defined as prime agricultural land.	<a href="https://www.nrcs.usda.gov/wps/portal/nrcs/detailfull/soils/survey/?cid=nrcs142p2_053369">https://www.nrcs.usda.gov/wps/portal/nrcs/detailfull/soils/survey/?cid=nrcs142p2_053369</a>
9	Agriculture and Working Lands	Storie Index	USDA - Soil Survey Geographic Database	Preserving prime agricultural lands and open space is a key statutory mandate of California's Local Agency Formation Commissions (Cortese-Knox Hertzberg Act 2000, Gov. Code §56301). The Storie Index is a soil rating based on soil characteristics that govern the land's potential utilization and agricultural capacity. Lands with an index score of 80-100 or Grade 1 are statutorily defined as prime agricultural land. This land valuation is independent of other physical or economic factors that might determine the desirability of growing certain plants in a given location. The characteristics evaluated include suitable soil profiles, surface texture, slope, and dynamic properties.	<a href="https://datagateway.nrcs.usda.gov/">https://datagateway.nrcs.usda.gov/</a>
10	Agriculture and Working Lands/Built Environment	Ventura County SOAR	Ventura County	SOAR (Save Our Agricultural Areas) Ordinance ensures that until December 31, 2050, property designated Agricultural, Open Space and Rural land use designations may not be changed to a more intense, urban designation except by vote of the people.	<a href="https://www.ventura.org/gis-and-mapping/regulatory-boundaries-rma/">https://www.ventura.org/gis-and-mapping/regulatory-boundaries-rma/</a>

Attachment: ATTACHMENT C - SoCal Greenprint Proposed Data Layer List (SoCal Greenprint Update)

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SoCal Greenprint

Proposed Data Layers for Inclusion

July Version (update 2)

#	Theme	Data Name	Source	Description	Additional Information
11	Built Environment	Light pollution	<p>1) Falchi, Fabio; Cinzano, Pierantonio; Duriscoe, Dan; Kyba, Christopher C. M.; Elvidge, Christopher D.; Baugh, Kimberly; Portnov, Boris; Rybnikova, Nataliya A.; Furgoni, Riccardo (2016): Supplement to: The New World Atlas of Artificial Night Sky Brightness. GFZ Data Services. <a href="http://doi.org/10.5880/GFZ.1.4.2016.001">http://doi.org/10.5880/GFZ.1.4.2016.001</a></p> <p>2) Falchi F, Cinzano P, Duriscoe D, Kyba CC, Elvidge CD, Baugh K, Portnov BA, Rybnikova NA, Furgoni R. The new world atlas of artificial night sky brightness. Science Advances. 2016 Jun 1;2(6):e1600377.</p>	<p><a href="http://www.lightpollutionmap.info">www.lightpollutionmap.info</a> is a mapping application that displays light pollution related content over Microsoft Bing base layers (road and hybrid Bing maps). The primary use was to show VIIRS/DMSP data in a friendly manner, but over the many years it received also some other interesting light pollution related content like SQM/SQC measurements, World Atlas 2015 zenith brightness, almost realtime clouds , aurora prediction and IAU observatories features.</p>	<p><a href="https://www.lightpollutionmap.info/">https://www.lightpollutionmap.info/</a></p>
12	Built Environment	Desert Renewable Energy Conservation Plan (DRECP) Development Focus Areas & Variance Lands	California Energy Commission	Zones where renewable energy development is permitted.	<p><a href="https://www.energy.ca.gov/programs-and-topics/programs/desert-renewable-energy-conservation-plan">https://www.energy.ca.gov/programs-and-topics/programs/desert-renewable-energy-conservation-plan</a></p>
13	Built Environment	2018 Noise Data	Bureau of Transportation Statistics	Data within the National Transportation Noise Map represent potential noise levels across the nation for an average annual day for the specified year. This dataset is developed using a 24-hr equivalent A-weighted sound level (denoted by LAeq) noise metric. The results represent the approximate average noise energy due to transportation noise sources over a 24-hour period at the receptor locations where noise is computed. Layers include Aviation, Passenger Rail (prototype), and Road Noise for the Lower 48 States as well as Alaska and Hawaii.	<p><a href="https://data-usdot.opendata.arcgis.com/datasets/2018-noise-data">https://data-usdot.opendata.arcgis.com/datasets/2018-noise-data</a></p>
14	Built Environment	Local Area Transportation (vehicle miles traveled)	Bureau of Transportation Statistics	Average weekday household Vehicle Miles Traveled (VMT) is the estimated miles traveled by a household. The estimate is derived using data from the National Household Transportation Survey and the American Community Survey. Data is available at the census tract level.	<p><a href="https://www.bts.gov/latch/latch-data">https://www.bts.gov/latch/latch-data</a></p>
15	Built Environment	Sewer network - LA county	LA County	Los Angeles Public Works Sanitary Sewer System includes sewer lines, manholes, pump stations, treatment plants and SMD Operations grid.	<p><a href="https://egis-lacounty.hub.arcgis.com/datasets/lacpw-sanitary-sewer-network">https://egis-lacounty.hub.arcgis.com/datasets/lacpw-sanitary-sewer-network</a></p>

Attachment: ATTACHMENT C - SoCal Greenprint Proposed Data Layer List (SoCal Greenprint Update)

**DRAFT**

# Attachment C - SoCal Greenprint Proposed Data Layer List

SoCal Greenprint

Proposed Data Layers for Inclusion

July Version (update 2)

#	Theme	Data Name	Source	Description	Additional Information
16	Built Environment	LA County no wind policy	LA County Planning	The Renewable Energy Ordinance updates the County's planning and zoning code for the review and permitting of solar and wind energy projects. The ordinance helps California meet its goals for renewable energy generation and greenhouse gas reduction, while minimizing environmental and community impacts.	<a href="https://planning.lacounty.gov/energy">https://planning.lacounty.gov/energy</a>
17	Built Environment	Impervious surfaces	NLCD 2016	USGS and other partner agencies created and the National Land Cover Database to provide spatially explicit and reliable information on the Nation's land cover and land cover change.	<a href="https://www.mrlc.gov/data/nlcd-2016-land-cover-conus">https://www.mrlc.gov/data/nlcd-2016-land-cover-conus</a>
18	Built Environment	Sewer network - Orange County	Orange County Sanitation District	Orange County Sanitation District Sewer System, including sewer lines, manholes, pump stations, reclamation plants, and treatment plants.	<a href="https://www.ocsan.gov/about-us/general-information/service-area">https://www.ocsan.gov/about-us/general-information/service-area</a>
19	Built Environment	Riverside County eRED	Riverside County	The purpose of the eRED program is to coordinate and encourage eligible renewable energy resource development (eRED) in the county at the General Plan level.	<a href="https://planning.rctlma.org/Home/Riverside-County-eRED-Program">https://planning.rctlma.org/Home/Riverside-County-eRED-Program</a>
20	Built Environment	Imperial Overlay	Salton Sea Authority	Renewable energy zoning in Imperial County.	<a href="https://www.arcgis.com/home/item.html?id=7a13fe10540f41a496875222e2fabbb6">https://www.arcgis.com/home/item.html?id=7a13fe10540f41a496875222e2fabbb6</a>
21	Built Environment	San Bernardino Renewable Energy Element	San Bernardino County	The San Bernardino County government seeks to manage land use and development in a manner consistent with the Countywide Vision. This Element is focused on sustainability, public health and wellness, and stewardship of land to promote an environment of prosperity and well-being for those who reside and invest in the County. In this context, the Renewable Energy and Conservation Element (Element) is intended to ensure efficient consumption of energy and water, reduce greenhouse gas emissions, pursue the benefits of renewable energy and responsibly manage its impacts on our environment, communities and economy.	<a href="http://www.sbcounty.gov/uploads/LUS/Renewable/2019_WEBSITE/REC%20Element.pdf">http://www.sbcounty.gov/uploads/LUS/Renewable/2019_WEBSITE/REC%20Element.pdf</a>
22	Built Environment	Public Transit Lines	SCAG	Rail lines, Metrolink lines, bus lines from 2016.	Maps available at <a href="https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial_passenger-rail.pdf?1606001722">https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial_passenger-rail.pdf?1606001722</a>
23	Built Environment	Public Transit Stops	SCAG	Rail lines, Metrolink lines, bus stops from 2016.	<a href="https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial_transit.pdf?1606002122">https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial_transit.pdf?1606002122</a>
24	Built Environment	Entitlements (2018)	SCAG	Entitled projects conveyed by jurisdictions to SCAG in 2018. Note this dataset is not comprehensive, as it only includes volunteered information from jurisdictions and jurisdictions are the authority on entitled projects.	<a href="https://scag.ca.gov/sites/main/files/file-attachments/entitlementsscag.pdf?1604792634">https://scag.ca.gov/sites/main/files/file-attachments/entitlementsscag.pdf?1604792634</a>

Attachment: ATTACHMENT C - SoCal Greenprint Proposed Data Layer List (SoCal Greenprint Update)

**DRAFT**

# Attachment C - SoCal Greenprint Proposed Data Layer List

SoCal Greenprint

Proposed Data Layers for Inclusion

July Version (update 2)

#	Theme	Data Name	Source	Description	Additional Information
25	Built Environment	Airports	SCAG Open Data Portal	Locations (geometric centroids) of airports and airfields in the Southern California Association of Governments (SCAG) region.	<a href="https://gisdata-scag.opendata.arcgis.com/datasets/airports-scag-region-1/explore?location=33.756267%2C-116.923250%2C8.92">https://gisdata-scag.opendata.arcgis.com/datasets/airports-scag-region-1/explore?location=33.756267%2C-116.923250%2C8.92</a>
26	Built Environment	Ports	SCAG Open Data Portal	Cargo ports in the SCAG Region.	<a href="https://gisdata-scag.opendata.arcgis.com/datasets/cargo-ports-scag-region/explore?location=33.911500%2C-118.708050%2C11.29">https://gisdata-scag.opendata.arcgis.com/datasets/cargo-ports-scag-region/explore?location=33.911500%2C-118.708050%2C11.29</a>
27	Built Environment	City Urban Restriction Boundary (CURB) - Ventura County	Ventura County	City Urban Restriction Boundary (CURB) represents urban growth boundaries adopted by ballot initiatives or city councils. Development of property outside these boundaries requires the approval of the voters of the relevant city	<a href="https://www.ventura.org/gis-and-mapping/regulatory-boundaries-rma/">https://www.ventura.org/gis-and-mapping/regulatory-boundaries-rma/</a>
28	Built Environment	Greenbelts - Ventura County	Ventura County	Identification of the boundaries of the seven adopted greenbelts in Ventura County. Includes the Fillmore-Piru, Oxnard-Camarillo, Santa Paula-Fillmore, Santa Rosa Valley, Tierra Rejada, Ventura-Oxnard, and Ventura-Santa Paula Greenbelts.	<a href="https://www.ventura.org/gis-and-mapping/regulatory-boundaries-rma/">https://www.ventura.org/gis-and-mapping/regulatory-boundaries-rma/</a>
29	Vulnerabilities and Resilience	Liquefaction Susceptibility Zones	CA Department of Conservation	Liquefaction takes place when loosely packed, water-logged sediments at or near the ground surface lose their strength in response to strong ground shaking. Liquefaction occurring beneath buildings and other structures can cause major damage during earthquakes.	<a href="https://maps.conservation.ca.gov/cgs/EQZApp/app/">https://maps.conservation.ca.gov/cgs/EQZApp/app/</a>
30	Vulnerabilities and Resilience	Tsunami Inundation Zone	CA Department of Conservation	Produced collectively by tsunami modelers, geologic hazard mapping specialists, and emergency planning scientists from CGS, Cal OES, and the Tsunami Research Center at the University of Southern California, the tsunami inundation maps for California cover most residentially and transient populated areas along the state's coastline. Coordinated by Cal OES, these official maps are developed for all populated areas at risk to tsunamis in California and represent a combination of the maximum considered tsunamis for each area.  The tsunami inundation maps were prepared to assist cities and counties in identifying their tsunami hazard. They are intended for local jurisdictional, coastal evacuation planning uses only.	<a href="https://maps.conservation.ca.gov/geologicHazards/#datalist">https://maps.conservation.ca.gov/geologicHazards/#datalist</a>
31	Vulnerabilities and Resilience	Fire Hazard Severity Zone	CAL FIRE	A Fire Hazard Severity Zone (FHSZ) is a mapped area that designates zones (based on factors such as fuel, slope, and fire weather) with varying degrees of fire hazard (i.e., moderate, high, and very high). FHSZ maps evaluate wildfire hazards, which are physical conditions that create a likelihood that an area will burn over a 30- to 50-year period.	<a href="https://osfm.fire.ca.gov/divisions/wildfire-planning-engineering/wildland-hazards-building-codes/fire-hazard-severity-zones-maps/">https://osfm.fire.ca.gov/divisions/wildfire-planning-engineering/wildland-hazards-building-codes/fire-hazard-severity-zones-maps/</a>
32	Vulnerabilities and Resilience	Historic Wildfire Perimeters	CAL FIRE	The fire perimeter database represents the most complete digital record of fire perimeters in California.	<a href="https://frap.fire.ca.gov/frap-projects/fire-perimeters/">https://frap.fire.ca.gov/frap-projects/fire-perimeters/</a>

Attachment: ATTACHMENT C - SoCal Greenprint Proposed Data Layer List (SoCal Greenprint Update)

**DRAFT**

# Attachment C - SoCal Greenprint Proposed Data Layer List

SoCal Greenprint

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July Version (update 2)

#	Theme	Data Name	Source	Description	Additional Information
33	Vulnerabilities and Resilience	Earthquake Shaking Potential	California Geological Survey	The California Geological Survey published maps of Earthquake Shaking Potential for California in 1999 and has revised the maps following each update of the National Seismic Hazard Maps (NSHM). Similar to the NSHMs, the Earthquake Shaking Potential Maps for California depict expected intermediate period (1s or 1hz) ground motions with 2% exceedance probability in 50 years. Unlike the NSHMs, Earthquake Shaking Potential Map for California incorporates anticipated amplification of ground motions by local soil conditions. The current update of the Earthquake Shaking Potential Map for California (California Geological Survey Map Sheet 48) is based on the 2014 NSHMs developed by the United States Geological Survey (Petersen et al., 2014), a new map of the average shear wave velocity in the upper 30m of the earths surface for California (Wills et al., 2015), and a new semi-empirical nonlinear site amplification model (Seyhan and Stewart, 2014).	<a href="https://www.arcgis.com/home/webmap/viewer.html?url=https%3A%2F%2Fgis.conserva%2Fserver%2Frest%2Fservices%2FAGS%2FMapServer%2F48_ShakingPotential%2FMapServer&amp;source=sd">https://www.arcgis.com/home/webmap/viewer.html?url=https%3A%2F%2Fgis.conserva%2Fserver%2Frest%2Fservices%2FAGS%2FMapServer%2F48_ShakingPotential%2FMapServer&amp;source=sd</a>
34	Vulnerabilities and Resilience	Historic Landslides	California Geological Survey	The statewide landslide map database shows many of the landslides mapped by CGS and others over the past 50 years. Each feature includes a database record showing at least the source of the original mapping.	<a href="https://maps.conserva.ca.gov/cgs/lsl/">https://maps.conserva.ca.gov/cgs/lsl/</a> (Data available through request)
35	Vulnerabilities and Resilience	Landslides	California Geological Survey	Seismic Hazard Zones: Landslides	<a href="https://maps.conserva.ca.gov/geologicHazards/#datalist">https://maps.conserva.ca.gov/geologicHazards/#datalist</a>
36	Vulnerabilities and Resilience	Alquist-Priolo Faults	California Geological Survey	Alquist-Priolo fault zones are regulatory zones around active faults in California to reduce human losses during earthquakes.	<a href="https://gis.conserva.ca.gov/server/rest/services/CGS_Earthquake_Hazard_Zones/SHP_Fault_Zones/FeatureServer">https://gis.conserva.ca.gov/server/rest/services/CGS_Earthquake_Hazard_Zones/SHP_Fault_Zones/FeatureServer</a>
37	Vulnerabilities and Resilience	500-Year Floodplain	FEMA	Flood zones are defined by the Federal Emergency Management Agency (FEMA) to identify varying levels of flood risk and inform the Flood Insurance Rate Map. Floods are the second-most common natural disaster, and they often occur quickly in low-lying areas after heavy rains. The 500-year floodplain is the area that has a 0.2-percent annual chance of flooding and is also referred to as the moderate flood hazard area. These are between the limits of the 1-percent-annual-chance (base flood) and the 0.2-percent-annual-chance.	<a href="https://www.fema.gov/flood-maps">https://www.fema.gov/flood-maps</a>
38	Vulnerabilities and Resilience	100-Year Floodplain	FEMA	Flood zones are defined by the Federal Emergency Management Agency (FEMA) to identify varying levels of flood risk and inform the Flood Insurance Rate Map. Floods are the second-most common natural disaster, and they often occur quickly in low-lying areas after heavy rains. The 100-year floodplain is the area that has a 1-percent-annual-chance of flooding and is also referred to as the base flood, while moderate flood hazard areas are between the limits of the base flood and the 0.2-percent-annual-chance or 500-year flood.	<a href="https://www.fema.gov/flood-maps">https://www.fema.gov/flood-maps</a>

Attachment: ATTACHMENT C - SoCal Greenprint Proposed Data Layer List (SoCal Greenprint Update)

# Attachment C - SoCal Greenprint Proposed Data Layer List

SoCal Greenprint

Proposed Data Layers for Inclusion

July Version (update 2)

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39	Vulnerabilities and Resilience	Sea Level Rise	National Oceanic and Atmospheric Administration	5 foot inundation area and intertidal area	<a href="https://coast.noaa.gov/slr/#/layer/slr/5/-13129306.174783863/3794179.6383960927/10/satellite/none/0.8/2050/interHigh/midAccretion">https://coast.noaa.gov/slr/#/layer/slr/5/-13129306.174783863/3794179.6383960927/10/satellite/none/0.8/2050/interHigh/midAccretion</a>
40	Vulnerabilities and Resilience	Potential Future Habitat	The Nature Conservancy	TNC Conserving California Coastal Habitat. Due to predicted sea level rise, these areas are important migration space for highly restricted habitats.	<a href="https://scc.ca.gov/2018/05/15/coastalassessment/">https://scc.ca.gov/2018/05/15/coastalassessment/</a>
41	Vulnerabilities and Resilience	Coastal Habitat Vulnerability	The Nature Conservancy	TNC Conserving California Coastal Habitat. Due to predicted sea level rise, these areas are important migration space for highly restricted habitats.	<a href="https://scc.ca.gov/2018/05/15/coastalassessment/">https://scc.ca.gov/2018/05/15/coastalassessment/</a>
42	Vulnerabilities and Resilience	Landscape Resilience - refugia	University of California, Davis	Areas where vegetation will not likely be stressed by climate change because the vegetation in those areas will likely experience climate conditions that are within the range of conditions they are currently found in in California.	<a href="https://www.conservationgateway.org/conservationbygeography/northamerica/unitedstates/oregon/science/pages/resilient-landscapes.aspx">https://www.conservationgateway.org/conservationbygeography/northamerica/unitedstates/oregon/science/pages/resilient-landscapes.aspx</a>
43	Vulnerabilities and Resilience	Landscape Resilience - resilient areas	The Nature Conservancy California Science. 2015. Landscape Resilience to Climate Change.	An index that indicates the presence and accessibility of microhabitat options by quantifying both the permeability of the landscape and the diversity in potential "wetness" and "heat" based on topography.	<a href="https://www.conservationgateway.org/conservationbygeography/northamerica/unitedstates/oregon/science/pages/resilient-landscapes.aspx">https://www.conservationgateway.org/conservationbygeography/northamerica/unitedstates/oregon/science/pages/resilient-landscapes.aspx</a>
44	Vulnerabilities and Resilience	Historic High Heat Days (100 degrees)	Union of Concerned Scientists	This analysis shows the rapid, widespread increases in extreme heat that are projected to occur across the country due to climate change.	<a href="https://www.ucsusa.org/resources/killer-heat-united-states-0">https://www.ucsusa.org/resources/killer-heat-united-states-0</a>
45	Vulnerabilities and Resilience	Projected High Heat Days (100 degrees, mid century, slow action)	Union of Concerned Scientists	This analysis shows the rapid, widespread increases in extreme heat that are projected to occur across the country due to climate change.	<a href="https://www.ucsusa.org/resources/killer-heat-united-states-0">https://www.ucsusa.org/resources/killer-heat-united-states-0</a>
46	Vulnerabilities and Resilience	Wildland-Urban Interface 2010/2017	US Forest Service	The wildland-urban interface (WUI) is the area where houses meet or intermingle with undeveloped wildland vegetation. This makes the WUI a focal area for human-environment conflicts such as wildland fires, habitat fragmentation, invasive species, and biodiversity decline.	<a href="https://doi.org/10.2737/RDS-2015-0012-2">https://doi.org/10.2737/RDS-2015-0012-2</a>
47	Vulnerabilities and Resilience	Wildfire Risk to Communities	US Forest Service	Wildfire risk and likelihood	<a href="https://wildfirerisk.org/explore/0/06/">https://wildfirerisk.org/explore/0/06/</a>
48	Context	California Coastal Zone	California Coastal Commission	This data depicts the California Coastal Commission's Coastal Zone Boundary for the State of California.	<a href="https://map.dfg.ca.gov/metadata/ds0990.html">https://map.dfg.ca.gov/metadata/ds0990.html</a>
49	Context/Water Resources	Water Service Districts	California Department of Water Resources	Identifies public water agencies in California.	<a href="https://gis.data.cnra.ca.gov/datasets/45d26a15b96346f1816d8fe187f8570d_0">https://gis.data.cnra.ca.gov/datasets/45d26a15b96346f1816d8fe187f8570d_0</a>
50	Context	Open Space	California Protected Areas Database (CPAD)	The California Protected Areas Database (CPAD) contains GIS data about lands that are owned in fee and protected for open space purposes by over 1,000 public agencies or non-profit organizations.	<a href="https://www.calands.org/cpad/">https://www.calands.org/cpad/</a>

Attachment: ATTACHMENT C - SoCal Greenprint Proposed Data Layer List (SoCal Greenprint Update)

**DRAFT**

# Attachment C - SoCal Greenprint Proposed Data Layer List

SoCal Greenprint

Proposed Data Layers for Inclusion

July Version (update 2)

#	Theme	Data Name	Source	Description	Additional Information
51	Context	Land Cover	NLCD 2016	USGS and other partner agencies created and the National Land Cover Database to provide spatially explicit and reliable information on the Nation's land cover and land cover change.	<a href="https://www.mrlc.gov/data/nlcd-2016-land-cover-conus">https://www.mrlc.gov/data/nlcd-2016-land-cover-conus</a>
52	Context	Land Use Imperial County	SCAG Open Data Portal	This is SCAG's 2016 land use dataset developed for the Final Connect SoCal, the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), including general plan land use, specific plan land use, zoning code and existing land use.	<a href="https://gisdata-scag.opendata.arcgis.com/datasets/2016-land-use-information-for-imperial-county/explore?location=33.024680%2C-115.277764%2C10.35">https://gisdata-scag.opendata.arcgis.com/datasets/2016-land-use-information-for-imperial-county/explore?location=33.024680%2C-115.277764%2C10.35</a>
53	Context	Land Use Los Angeles County	SCAG Open Data Portal	This is SCAG's 2016 land use dataset developed for the Final Connect SoCal, the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), including general plan land use, specific plan land use and existing land use.	<a href="https://gisdata-scag.opendata.arcgis.com/datasets/2016-land-use-information-for-los-angeles-county/explore?location=33.815053%2C-118.299074%2C9.02">https://gisdata-scag.opendata.arcgis.com/datasets/2016-land-use-information-for-los-angeles-county/explore?location=33.815053%2C-118.299074%2C9.02</a>
54	Context	Land Use Orange County	SCAG Open Data Portal	This is SCAG's 2016 land use dataset developed for the Final Connect SoCal, the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), including general plan land use, specific plan land use and existing land use.	<a href="https://gisdata-scag.opendata.arcgis.com/datasets/2016-land-use-information-for-orange-county/explore?location=33.666961%2C-117.767034%2C10.90">https://gisdata-scag.opendata.arcgis.com/datasets/2016-land-use-information-for-orange-county/explore?location=33.666961%2C-117.767034%2C10.90</a>
55	Context	Land Use Riverside County	SCAG Open Data Portal	This is SCAG's 2016 land use dataset developed for the Final Connect SoCal, the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), including general plan land use, specific plan land use and existing land use.	<a href="https://gisdata-scag.opendata.arcgis.com/datasets/2016-land-use-information-for-riverside-county/explore?location=33.751919%2C-116.055780%2C9.75">https://gisdata-scag.opendata.arcgis.com/datasets/2016-land-use-information-for-riverside-county/explore?location=33.751919%2C-116.055780%2C9.75</a>
56	Context	Land Use San Bernardino County	SCAG Open Data Portal	This is SCAG's 2016 land use dataset developed for the Final Connect SoCal, the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), including general plan land use, specific plan land use and existing land use.	<a href="https://gisdata-scag.opendata.arcgis.com/datasets/2016-land-use-information-for-san-bernardino-county/explore?location=34.828232%2C-115.949280%2C9.05">https://gisdata-scag.opendata.arcgis.com/datasets/2016-land-use-information-for-san-bernardino-county/explore?location=34.828232%2C-115.949280%2C9.05</a>
57	Context	Land Use Ventura County	SCAG Open Data Portal	This is SCAG's 2016 land use dataset developed for the Final Connect SoCal, the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), including general plan land use, specific plan land use and existing land use.	<a href="https://gisdata-scag.opendata.arcgis.com/datasets/2016-land-use-information-for-ventura-county/explore?location=34.063512%2C-119.120837%2C9.34">https://gisdata-scag.opendata.arcgis.com/datasets/2016-land-use-information-for-ventura-county/explore?location=34.063512%2C-119.120837%2C9.34</a>
58	Context	Census tracts	SCAG Open Data Portal	Census Tracts used in the 2010 United States Census. Last updated 01/2018.	<a href="https://gisdata-scag.opendata.arcgis.com/datasets/census-tracts-in-scag">https://gisdata-scag.opendata.arcgis.com/datasets/census-tracts-in-scag</a>
59	Context	Green Region Initiative	SCAG Open Data Portal	This dataset is comprised of policy data, performance data, accompanying URL links on each data entry if available, and indicator category average data. The table of attributes contains data across 29 sustainability indicators, with upwards to 28,000 data entries.	<a href="https://gisdata-scag.opendata.arcgis.com/datasets/green-region-initiative">https://gisdata-scag.opendata.arcgis.com/datasets/green-region-initiative</a>
60	Context	California Assembly Districts	SCAG Open Data Portal	California Assembly Districts, updated as of 10/2017.	<a href="https://gisdata-scag.opendata.arcgis.com/datasets/california-assembly-districts-scag-region">https://gisdata-scag.opendata.arcgis.com/datasets/california-assembly-districts-scag-region</a>
61	Context	California Senate Districts	SCAG Open Data Portal	California Senate Districts in the Southern California Association of Governments (SCAG) region, updated as of 10/2017.	<a href="https://gisdata-scag.opendata.arcgis.com/datasets/california-senate-districts-scag-region">https://gisdata-scag.opendata.arcgis.com/datasets/california-senate-districts-scag-region</a>

Attachment: ATTACHMENT C - SoCal Greenprint Proposed Data Layer List (SoCal Greenprint Update)

**DRAFT**

# Attachment C - SoCal Greenprint Proposed Data Layer List

SoCal Greenprint

Proposed Data Layers for Inclusion

July Version (update 2)

#	Theme	Data Name	Source	Description	Additional Information
62	Context	SCAG regional council districts	SCAG Open Data Portal	Boundaries for the Southern California Association of Governments (SCAG) Regional Council districts. The Regional Council is SCAG's governing board, and it is made up of elected representatives from these 67 districts, each consisting of one or more cities in the region with approximately equal population and geographic continuity.	<a href="https://gisdata-scag.opendata.arcgis.com/datasets/regional-council-districts-scag-region">https://gisdata-scag.opendata.arcgis.com/datasets/regional-council-districts-scag-region</a>
63	Context	SCAG sphere of influence	SCAG Open Data Portal	SCAG's 2016 sphere of influence for individual cities (November 2019 version), developed for the 2020 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The dataset includes the sphere of influence for the 191 cities in the Southern California Association of Governments (SCAG) Region. The Sphere of Influence represents the geographic extent to which a city can expand by annexation.	<a href="https://gisdata-scag.opendata.arcgis.com/datasets/sphere-of-influence-scag">https://gisdata-scag.opendata.arcgis.com/datasets/sphere-of-influence-scag</a>
64	Context	SCAG subregions	SCAG Open Data Portal	Official subregional boundaries for the SCAG region. The file has been updated as of 06/12/2017.	<a href="https://gisdata-scag.opendata.arcgis.com/datasets/subregions-and-councils-of-government-scag-region">https://gisdata-scag.opendata.arcgis.com/datasets/subregions-and-councils-of-government-scag-region</a>
65	Context	SCAG supervisorial districts	SCAG Open Data Portal	Boundaries of the supervisorial districts within the Southern California Association of Governments (SCAG) region. This includes: Imperial County Supervisorial Districts, Los Angeles County Supervisorial Districts, Orange County Supervisorial Districts, Riverside County Supervisorial Districts, San Bernardino County Supervisorial Districts and Ventura County Supervisorial Districts.	<a href="https://gisdata-scag.opendata.arcgis.com/datasets/supervisorial-districts-scag-region">https://gisdata-scag.opendata.arcgis.com/datasets/supervisorial-districts-scag-region</a>
66	Context	Air basins	SCAG Open Data Portal	This dataset includes the boundaries and names of the California air basins in the Southern California Association of Governments (SCAG) region, as defined in state statute and regulation as of October 2014. This dataset includes the boundaries and names of the California air basins in the Southern California Association of Governments (SCAG) region, as defined in state statute and regulation as of October 2014.	<a href="https://gisdata-scag.opendata.arcgis.com/datasets/air-basins-scag-region">https://gisdata-scag.opendata.arcgis.com/datasets/air-basins-scag-region</a>
67	Context	Air districts	SCAG Open Data Portal	This dataset includes the boundaries and names of the California air pollution control and air quality management districts in the Southern California Association of Governments (SCAG) region, as defined in state statute and regulation as of October 2009.	<a href="https://gisdata-scag.opendata.arcgis.com/datasets/air-districts-scag-region">https://gisdata-scag.opendata.arcgis.com/datasets/air-districts-scag-region</a>
68	Context	City Boundaries	SCAG Open Data Portal	SCAG's 2016 city and county unincorporated area boundary data (November 2018 version), developed for the 2020 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The dataset includes the boundaries for the 191 cities and 6 county unincorporated areas in the Southern California Association of Governments (SCAG) Region.	<a href="https://gisdata-scag.opendata.arcgis.com/datasets/city-boundaries-scag-region">https://gisdata-scag.opendata.arcgis.com/datasets/city-boundaries-scag-region</a>
69	Context	Congressional districts	SCAG Open Data Portal	California Congressional Districts, updated as of 10/2017.	<a href="https://gisdata-scag.opendata.arcgis.com/datasets/california-congressional-districts-scag-region">https://gisdata-scag.opendata.arcgis.com/datasets/california-congressional-districts-scag-region</a>

Attachment: ATTACHMENT C - SoCal Greenprint Proposed Data Layer List (SoCal Greenprint Update)

**DRAFT**

# Attachment C - SoCal Greenprint Proposed Data Layer List

SoCal Greenprint

Proposed Data Layers for Inclusion

July Version (update 2)

#	Theme	Data Name	Source	Description	Additional Information
70	Context	County Boundaries	SCAG Open Data Portal	County boundaries that make up the Southern California Association of Governments service area. These county boundaries are consistent with the LAFCO city boundaries as of 08/2016 (Ver. 1.0).	<a href="https://gisdata-scag.opendata.arcgis.com/datasets/county-boundaries-scag-region">https://gisdata-scag.opendata.arcgis.com/datasets/county-boundaries-scag-region</a>
71	Context	Zoning Imperial County	SCAG Open Data Portal	Countywide zoning code information (November 2016 version).	<a href="https://gisdata-scag.opendata.arcgis.com/datasets/2016-land-use-information-for-imperial-county/explore?location=33.024680%2C-115.277764%2C10.35">https://gisdata-scag.opendata.arcgis.com/datasets/2016-land-use-information-for-imperial-county/explore?location=33.024680%2C-115.277764%2C10.35</a>
72	Context	Zoning Los Angeles County	SCAG Open Data Portal	Countywide zoning code information (November 2016 version).	<a href="https://gisdata-scag.opendata.arcgis.com/datasets/2016-land-use-information-for-los-angeles-county/explore?location=33.815053%2C-118.299074%2C9.02">https://gisdata-scag.opendata.arcgis.com/datasets/2016-land-use-information-for-los-angeles-county/explore?location=33.815053%2C-118.299074%2C9.02</a>
73	Context	Zoning Orange County	SCAG Open Data Portal	Countywide zoning code information (November 2016 version).	<a href="https://gisdata-scag.opendata.arcgis.com/datasets/2016-land-use-information-for-orange-county/explore?location=33.666961%2C-117.767034%2C10.90">https://gisdata-scag.opendata.arcgis.com/datasets/2016-land-use-information-for-orange-county/explore?location=33.666961%2C-117.767034%2C10.90</a>
74	Context	Zoning Riverside County	SCAG Open Data Portal	Countywide zoning code information (November 2016 version).	<a href="https://gisdata-scag.opendata.arcgis.com/datasets/2016-land-use-information-for-riverside-county/explore?location=33.751919%2C-116.055780%2C9.75">https://gisdata-scag.opendata.arcgis.com/datasets/2016-land-use-information-for-riverside-county/explore?location=33.751919%2C-116.055780%2C9.75</a>
75	Context	Zoning San Bernardino County	SCAG Open Data Portal	Countywide zoning code information (November 2016 version).	<a href="https://gisdata-scag.opendata.arcgis.com/datasets/2016-land-use-information-for-san-bernardino-county/explore?location=34.828232%2C-115.949280%2C9.05">https://gisdata-scag.opendata.arcgis.com/datasets/2016-land-use-information-for-san-bernardino-county/explore?location=34.828232%2C-115.949280%2C9.05</a>
76	Context	Zoning Ventura County	SCAG Open Data Portal	Countywide zoning code information (November 2016 version).	<a href="https://gisdata-scag.opendata.arcgis.com/datasets/2016-land-use-information-for-ventura-county/explore?location=34.063512%2C-119.120837%2C9.34">https://gisdata-scag.opendata.arcgis.com/datasets/2016-land-use-information-for-ventura-county/explore?location=34.063512%2C-119.120837%2C9.34</a>
77	Environmental Justice, Equity, and Inclusion	CalEnviroScreen Pollution Burden	CA Office of Environmental Health Hazard Assessment	Pollution burden represents the potential exposures to pollutants and the adverse environmental conditions caused by pollution. The pollution burden indicators from CalEnviroScreen include ozone, particulate matter 2.5 (PM 2.5), diesel particulate matter, drinking water contaminant threats, pesticides, toxic releases, traffic impacts, cleanup sites, groundwater threats, hazardous waste, impaired waters, and solid waste.	<a href="https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-30">https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-30</a>
78	Environmental Justice, Equity, and Inclusion	CalEnviroScreen Percentile	CA Office of Environmental Health Hazard Assessment	CalEnviroScreen is a statewide environmental health screening tool created by the California Office of Environmental Health Hazard Assessment (OEHHA) as part of the California Protection Agency's Environmental Justice Program. The tool aims to identify communities that are burdened by pollution from multiple sources and vulnerable to its effects. CalEnviroScreen 3.0 uses 20 indicators of pollution, environmental quality, and socioeconomic and public health conditions.	<a href="https://oehha.ca.gov/calenviroscreen">https://oehha.ca.gov/calenviroscreen</a>

Attachment: ATTACHMENT C - SoCal Greenprint Proposed Data Layer List (SoCal Greenprint Update)

# Attachment C - SoCal Greenprint Proposed Data Layer List

SoCal Greenprint

Proposed Data Layers for Inclusion

July Version (update 2)

#	Theme	Data Name	Source	Description	Additional Information
79	Environmental Justice, Equity, and Inclusion	Disadvantaged Communities	CA Office of Environmental Health Hazard Assessment	Disadvantaged communities in California are specifically targeted for investment of proceeds from the State's cap-and-trade program. These investments are aimed at improving public health, quality of life and economic opportunity in California's most burdened communities at the same time reducing pollution that causes climate change. These areas represent the 25% highest scoring census tracts in CalEnviroScreen 3.0, along with other areas with high amounts of pollution and low populations.	<a href="https://oehha.ca.gov/calenviroscreen/sb535">https://oehha.ca.gov/calenviroscreen/sb535</a>
80	Environmental Justice, Equity, and Inclusion	Trails - CA State Parks	CA State Parks	CA state parks recreational routes	<a href="https://www.parks.ca.gov/?page_id=29682">https://www.parks.ca.gov/?page_id=29682</a>
81	Environmental Justice, Equity, and Inclusion	Toxic Release Inventory Facilities	California Department of Toxic Substances Control	Industrial and federal facilities that report toxic chemical releases and pollution prevention activities to the Toxic Release Inventory (TRI) system. The Toxics Release Inventory (TRI) is a federal database that contains detailed information on nearly 650 chemicals and chemical categories that over 1,600 industrial and other facilities in the state manage through disposal or other releases, recycling, energy recovery, or treatment. The data are collected from these facilities by the U.S. Environmental Protection Agency.	<a href="https://gis.data.ca.gov/datasets/0094052fe5114e789f4f770406035bf9_0?geometry=-118.957%2C33.657%2C-117.694%2C34.056">https://gis.data.ca.gov/datasets/0094052fe5114e789f4f770406035bf9_0?geometry=-118.957%2C33.657%2C-117.694%2C34.056</a>
82	Environmental Justice, Equity, and Inclusion	Publicly accessible recreational lands	California Protected Area Database (CPAD)	Open space that is publicly accessible and can be used for recreation.	<a href="https://www.calands.org/cpad/">https://www.calands.org/cpad/</a>
83	Environmental Justice, Equity, and Inclusion	CA School Campus Database	California School Campus Database	CSCD is a GIS data set that contains detailed outlines of the lands used by public schools for educational purposes. It includes campus boundaries of schools with kindergarten through 12th grade instruction, as well as colleges, universities, and public community colleges. Each is accurately mapped at the assessor parcel level. CSCD is the first statewide database of this information and is available for use without restriction.	<a href="http://www.californiaschoolcampusdatabase.org/">http://www.californiaschoolcampusdatabase.org/</a>
84	Environmental Justice, Equity, and Inclusion	Park Access - no park within half-mile	California State Parks	Neighborhood areas that do not have a park within a half mile.	<a href="https://www.parksforcalifornia.org/parkaccess/?overlays1=parks%2Cnoparkaccess&amp;overlays2=parks%2Cparksper1000">https://www.parksforcalifornia.org/parkaccess/?overlays1=parks%2Cnoparkaccess&amp;overlays2=parks%2Cparksper1000</a>
85	Environmental Justice, Equity, and Inclusion	Park Access - Park Acres per thousand	California State Parks	Ratio of park acres per thousand residents.	<a href="https://www.parksforcalifornia.org/parkaccess/?overlays1=parks%2Cnoparkaccess&amp;overlays2=parks%2Cparksper1000">https://www.parksforcalifornia.org/parkaccess/?overlays1=parks%2Cnoparkaccess&amp;overlays2=parks%2Cparksper1000</a>

Attachment: ATTACHMENT C - SoCal Greenprint Proposed Data Layer List (SoCal Greenprint Update)

# Attachment C - SoCal Greenprint Proposed Data Layer List

SoCal Greenprint

Proposed Data Layers for Inclusion

July Version (update 2)

#	Theme	Data Name	Source	Description	Additional Information
86	Environmental Justice, Equity, and Inclusion	Opportunities for affordable housing	California Tax Credit Allocation Committee	TCAC and HCD charged the Task Force with creating an opportunity map to identify areas in every region of the state whose characteristics have been shown by research to support positive economic, educational, and health outcomes for low-income families—particularly long-term outcomes for children. TCAC intended to adopt this map into its regulations, which it eventually did in December 2017, to accompany new policies aimed at increasing access to highopportunity areas for families with children in housing financed with 9% Low Income Housing Tax Credits (LIHTCs). For this reason, the Task Force designed this map and the methodology behind it with the funding infrastructure for the 9% LIHTC program (e.g., geographic competition, a separate funding pool for rural applicants), as well as that of key HCD funding programs such as the Multifamily Housing Program, in mind.	<a href="https://belonging.berkeley.edu/2021-tcac-opportunity-map">https://belonging.berkeley.edu/2021-tcac-opportunity-map</a>
87	Environmental Justice, Equity, and Inclusion	Sequestration of NO2 by vegetation (g/yr)	Gopalakrishnan et al. 2018. Air quality and human health impacts of grasslands and shrublands in the United States. Atmospheric Environment 182: 193-199.	Contribution of vegetation to sequester NO2 to reduce its pollution impacts.	<a href="https://www.sciencedirect.com/science/article/abs/pii/S1352231018301936">https://www.sciencedirect.com/science/article/abs/pii/S1352231018301936</a> (Data available through request)
88	Environmental Justice, Equity, and Inclusion	Sequestration of PM2.5 by vegetation (g/yr)	Gopalakrishnan et al. 2018. Air quality and human health impacts of grasslands and shrublands in the United States. Atmospheric Environment 182: 193-199.	Contribution of vegetation to sequester PM2.5 to reduce its pollution impacts.	<a href="https://www.sciencedirect.com/science/article/abs/pii/S1352231018301936">https://www.sciencedirect.com/science/article/abs/pii/S1352231018301936</a> (Data available through request)

Attachment: ATTACHMENT C - SoCal Greenprint Proposed Data Layer List (SoCal Greenprint Update)

# Attachment C - SoCal Greenprint Proposed Data Layer List

SoCal Greenprint

Proposed Data Layers for Inclusion

July Version (update 2)

#	Theme	Data Name	Source	Description	Additional Information
89	Environmental Justice, Equity, and Inclusion	Historic Redlining	Homeowners Loan Corporation	<p>The Home Owners' Loan Corporation (HOLC) was created in the New Deal Era and trained many home appraisers in the 1930s. The HOLC created a neighborhood ranking system infamously known today as redlining. Local real estate developers and appraisers in over 200 cities assigned grades to residential neighborhoods. These maps and neighborhood ratings set the rules for decades of real estate practices. The grades ranged from A to D. A was traditionally colored in green, B was traditionally colored in blue, C was traditionally colored in yellow, and D was traditionally colored in red.</p> <p>A (Best): Always upper- or upper-middle-class White neighborhoods that HOLC defined as posing minimal risk for banks and other mortgage lenders, as they were "ethnically homogeneous" and had room to be further developed.</p> <p>B (Still Desirable): Generally nearly or completely White, U.S. -born neighborhoods that HOLC defined as "still desirable" and sound investments for mortgage lenders.</p> <p>C (Declining): Areas where the residents were often working-class and/or first or second generation immigrants from Europe. These areas often lacked utilities and were characterized by older building stock.</p> <p>D (Hazardous): Areas here often received this grade because they were "infiltrated" with "undesirable populations" such as Jewish, Asian, Mexican, and Black families. These areas were more likely to be close to industrial areas and to have older housing.</p>	<a href="https://tnc.maps.arcgis.com/home/item.html?id=ef0f926eb1b146d082c38cc35b53c947">https://tnc.maps.arcgis.com/home/item.html?id=ef0f926eb1b146d082c38cc35b53c947</a>

Attachment: ATTACHMENT C - SoCal Greenprint Proposed Data Layer List (SoCal Greenprint Update)

DRAFT

# Attachment C - SoCal Greenprint Proposed Data Layer List

SoCal Greenprint

Proposed Data Layers for Inclusion

July Version (update 2)

#	Theme	Data Name	Source	Description	Additional Information
				<p>Banks received federal backing to lend money for mortgages based on these grades. Many banks simply refused to lend to areas with the lowest grade, making it impossible for people in many areas to become homeowners. While this type of neighborhood classification is no longer legal thanks to the Fair Housing Act of 1968 (which was passed in large part due to the activism and work of the NAACP and other groups), the effects of disinvestment due to redlining are still observable today. For example, the health and wealth of neighborhoods in Chicago today can be traced back to redlining (Chicago Tribune).</p> <p>In addition to formerly redlined neighborhoods having fewer resources such as quality schools, access to fresh foods, and health care facilities, new research from the Science Museum of Virginia finds a link between urban heat islands and redlining (Hoffman, et al., 2020). This layer comes out of that work, specifically from University of Richmond's Digital Scholarship Lab. More information on sources and digitization process can be found on the Data and Download and About pages.</p>	
90	Environmental Justice, Equity, and Inclusion	Trails - LA County	LA County	Location of trails in LA County	<a href="https://egis-lacounty.hub.arcgis.com/datasets/trails-1/explore?location=33.805000%2C-118.295000%2C9.03">https://egis-lacounty.hub.arcgis.com/datasets/trails-1/explore?location=33.805000%2C-118.295000%2C9.03</a>
91	Environmental Justice, Equity, and Inclusion	National Historic Trails	National Park Service	National Historic Trails	<p><u>Pacific Crest Trail:</u> <a href="https://services5.arcgis.com/ZldHa25efPFpMmFB/ArcGIS/rest/services">https://services5.arcgis.com/ZldHa25efPFpMmFB/ArcGIS/rest/services</a></p> <p><u>Juan Bautista de Anza:</u> <a href="https://nps.maps.arcgis.com/home/item.html?id=7b92e04dc7c74f269ba620e7540f9dbb">https://nps.maps.arcgis.com/home/item.html?id=7b92e04dc7c74f269ba620e7540f9dbb</a></p> <p><u>Old Spanish NHT:</u> <a href="https://nps.maps.arcgis.com/home/item.html?id=a4205715e04343638cfbc74ef128482d">https://nps.maps.arcgis.com/home/item.html?id=a4205715e04343638cfbc74ef128482d</a></p>
92	Environmental Justice, Equity, and Inclusion	Trails - Orange County	Orange County Public Works	Orange County Parks trails	<a href="https://data-ocpw.opendata.arcgis.com/datasets/a75cdbabf08e41e49d14a44479e1061a_0">https://data-ocpw.opendata.arcgis.com/datasets/a75cdbabf08e41e49d14a44479e1061a_0</a>
93	Environmental Justice, Equity, and Inclusion	Trails - Riverside County	Riverside County Parks	Trail System	<a href="https://documentcloud.adobe.com/link/track?uri=urn%3Aaaid%3Aascds%3AUS%3A17ec701b-1afd-45cd-a584-c5f937f0bcc0#pageNum=14">https://documentcloud.adobe.com/link/track?uri=urn%3Aaaid%3Aascds%3AUS%3A17ec701b-1afd-45cd-a584-c5f937f0bcc0#pageNum=14</a>
94	Environmental Justice, Equity, and Inclusion	Priority growth areas	SCAG	Priority Growth Areas (PGAs) are designated areas prioritized for new development based on established criteria (e.g. infrastructure, location, market) in the 2020 Connect SoCal Plan. PGAs follow the principles of center focused placemaking and are locations where many Connect SoCal strategies can be fully realized. PGA's account for only 4 percent of region's total land area, but implementation of SCAG's	<a href="https://maps.scag.ca.gov/scaggis/rest/services/HousingElements/Priority_Growth_Areas/MapServer">https://maps.scag.ca.gov/scaggis/rest/services/HousingElements/Priority_Growth_Areas/MapServer</a>

Attachment: ATTACHMENT C - SoCal Greenprint Proposed Data Layer List (SoCal Greenprint Update)

**DRAFT**

# Attachment C - SoCal Greenprint Proposed Data Layer List

SoCal Greenprint

Proposed Data Layers for Inclusion

July Version (update 2)

#	Theme	Data Name	Source	Description	Additional Information
				recommended growth strategies will help these areas accommodate 64 percent of forecasted household growth and 74 percent of forecasted employment growth between 2016 and 2045. This more compact form of regional development, if fully realized, can reduce travel distances, increase mobility options, improve access to workplaces, and conserve the region's resource areas.	<a href="https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial-03-plan.pdf">Maps available starting on page 35 of Chapter 3 in Connect SoCal: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial-03-plan.pdf</a>
95	Environmental Justice, Equity, and Inclusion	Native American Reservations	SCAG Open Data Portal	This dataset contains the boundaries for the Native American Reservations in the six counties in the Southern California Association of Governments (SCAG) region, as defined by the United States Census Bureau.	<a href="https://gisdata-scag.opendata.arcgis.com/datasets/native-american-reservations-scag-region?geometry=-126.166%2C32.279%2C-105.259%2C35.470">https://gisdata-scag.opendata.arcgis.com/datasets/native-american-reservations-scag-region?geometry=-126.166%2C32.279%2C-105.259%2C35.470</a>
96	Environmental Justice, Equity, and Inclusion	Healthy Places Index	SCAG Open Data Portal	Dataset of Healthy Place Index (HPI) Total Percentile Ranking (0 for most - 100 for least) Advantaged for SCAG's Active Transportation Program (ATP) that contains Census tract level food access, retail density, park access, tree canopy coverage, and Healthy Places Index (HPI) score data of the SCAG region. Food access data for 2015 (data source: USDA FARA 2017) includes the percentage of the urban population residing less than 1/2 mile from a supermarket/large grocery store, or the percentage of the rural population living less than 1 mile from a supermarket/large grocery store. Retail density data (data source: EPA Smart Location Database 2010) includes the gross retail, entertainment, and education employment density (jobs/acre) on unprotected land. Park access data (data source: HCI/CalLands Database 2010) includes the percentage of population living within a half-mile of a park, open space, or beach. Tree canopy coverage data (data source: HCI/National Land Cover Database 2011) includes population-weighted percentage of census tract area with tree canopy coverage. The HPI score (version: December 2017) is composed of diverse non-medical economic, social, political and environmental factors that influence physical and cognitive function, behavior and disease. These factors are often called health determinants or social determinants of health and form the root causes of health advantage. Indicator data used for HPI comes from publicly available sources and is produced at a census tract level. The HPI score was derived from 8 domain scores, 25 Individual indicators + race/ethnicity percent (8057 CTs). HPI materials will be made freely available online for use by communities and public and private agencies. More info at: <a href="http://phasocal.org/ca-hpi/">http://phasocal.org/ca-hpi/</a>	<a href="https://gisdata-scag.opendata.arcgis.com/datasets/healthy-places-index-hpi-2017">https://gisdata-scag.opendata.arcgis.com/datasets/healthy-places-index-hpi-2017</a>
97	Environmental Justice, Equity, and Inclusion	Communities of Concern	SCAG Open Data Portal	This dataset identifies "communities of concern," and is designated for SCAG's 2020 Regional Transportation Plan/Sustainable Communities Strategies (RTP/SCS) Environmental Justice Analysis Report.	<a href="https://gisdata-scag.opendata.arcgis.com/datasets/communities-of-concern">https://gisdata-scag.opendata.arcgis.com/datasets/communities-of-concern</a>

Attachment: ATTACHMENT C - SoCal Greenprint Proposed Data Layer List (SoCal Greenprint Update)

**DRAFT**

# Attachment C - SoCal Greenprint Proposed Data Layer List

SoCal Greenprint

Proposed Data Layers for Inclusion

July Version (update 2)

#	Theme	Data Name	Source	Description	Additional Information
98	Environmental Justice, Equity, and Inclusion	Environmental Justice Areas	SCAG Open Data Portal	Environmental Justice (EJ) areas in the SCAG region. The data was created using the base year 2016 data at the level of SCAG Tier 2 TAZs. EJ Area TAZs were identified if they had a higher concentration of minority population or households in poverty than is seen in the greater SCAG region.	<a href="https://gisdata-scag.opendata.arcgis.com/datasets/environmental-justice-areas--1/explore?location=34.203500%2C-116.714600%2C8.42">https://gisdata-scag.opendata.arcgis.com/datasets/environmental-justice-areas--1/explore?location=34.203500%2C-116.714600%2C8.42</a>
99	Environmental Justice, Equity, and Inclusion	Proposed and Existing Bikeways	SCAG Open Data Portal	SCAG Regional Bikeway Shapefile (RBS) contains proposed and existing bikeways, defined by class, within the SCAG region.	<a href="https://gisdata-scag.opendata.arcgis.com/datasets/bike-routes-scag-region">https://gisdata-scag.opendata.arcgis.com/datasets/bike-routes-scag-region</a>
100	Environmental Justice, Equity, and Inclusion	High Quality Transit Areas (2016)	SCAG Open Data Portal	High Quality Transit Areas (HQTAs) in the SCAG Region for the year 2016, updated as of February 2020.	<a href="https://gisdata-scag.opendata.arcgis.com/datasets/high-quality-transit-areas-hqta-2016-scag-region">https://gisdata-scag.opendata.arcgis.com/datasets/high-quality-transit-areas-hqta-2016-scag-region</a>
101	Environmental Justice, Equity, and Inclusion	Transit Priority Areas (2016)	SCAG Open Data Portal	Transit Priority Areas (TPAs) in the SCAG Region for the year 2016, updated as of February 2020. Transit Priority Area (TPA) means an area within one-half mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations.	<a href="https://maps.scag.ca.gov/scaggis/rest/services/SB743/TPAoverlaySP/MapServer/2">https://maps.scag.ca.gov/scaggis/rest/services/SB743/TPAoverlaySP/MapServer/2</a>
102	Environmental Justice, Equity, and Inclusion	High Quality Transit Areas (2045)	SCAG Open Data Portal	High Quality Transit Areas (HQTAs) in the SCAG Region for plan year 2045, updated as of February 2020. High Quality Transit Areas (HQTAs) is within one half-mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours.	<a href="https://gisdata-scag.opendata.arcgis.com/datasets/high-quality-transit-areas-hqta-2045-scag-region">https://gisdata-scag.opendata.arcgis.com/datasets/high-quality-transit-areas-hqta-2045-scag-region</a>
103	Environmental Justice, Equity, and Inclusion	Transit Priority Areas (2045)	SCAG Open Data Portal	Transit Priority Areas (TPAs) in the SCAG Region for plan year 2045, updated as of February 2020. Transit Priority Area (TPA) means an area within one-half mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations.	<a href="https://maps.scag.ca.gov/scaggis/rest/services/HousingElements/Priority_Growth_Areas/MapServer/3">https://maps.scag.ca.gov/scaggis/rest/services/HousingElements/Priority_Growth_Areas/MapServer/3</a>

Attachment: ATTACHMENT C - SoCal Greenprint Proposed Data Layer List (SoCal Greenprint Update)

# Attachment C - SoCal Greenprint Proposed Data Layer List

SoCal Greenprint

Proposed Data Layers for Inclusion

July Version (update 2)

#	Theme	Data Name	Source	Description	Additional Information
104	Environmental Justice, Equity, and Inclusion	Urban Displacement	The Urban Displacement Project	<p>UDP's Displacement Typologies use housing and demographic data from the US Census, as well as 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. Instead, typologies allow practitioners and researchers to see patterns in their regions over a specified time period, and are meant to start conversations about how policy interventions and investment could respond and support more equitable development.</p> <p>UDP's typologies are divided into 9 categories that may be generalized into three broad groups: displacement, gentrification, and exclusion. Because UDP findings indicate that displacement precedes gentrification, the first two typologies on the chart below indicate tracts that are in danger or are currently experiencing a loss in low income households. Following Displacement, the next three categories indicate the danger of gentrification, indicated by both demographic and housing market changes. Finally, the four categories in orange indicate exclusivity, indicating difficulty for low income households to enter a tract.</p>	<a href="https://github.com/ereifsnyder/displacement-typologies/blob/main/code/SCAG_DT/Displacement%20and%20Gentrification%20Typologies.md">https://github.com/ereifsnyder/displacement-typologies/blob/main/code/SCAG_DT/Displacement%20and%20Gentrification%20Typologies.md</a>
105	Environmental Justice, Equity, and Inclusion	National Forest System Trails	US Forest Service	Forest Service system trails	<a href="https://data.fs.usda.gov/geodata/edw/datasets.php">https://data.fs.usda.gov/geodata/edw/datasets.php</a>
106	Environmental Justice, Equity, and Inclusion	Trails - Ventura County	Ventura County Resource Management Agency	Hiking Trails	<a href="https://venturacountyactiveoutdoors-vcitsgis.hub.arcgis.com/apps/e29c75fe083b46e284f148119934e8f8/explore">https://venturacountyactiveoutdoors-vcitsgis.hub.arcgis.com/apps/e29c75fe083b46e284f148119934e8f8/explore</a>
107	Habitat and Biodiversity	Important bird areas	Audubon	<p>The objective of this project was to digitally map the boundaries of Audubon California's Important Bird Areas (IBA). Existing Important Bird Areas identify critical terrestrial and inland water habitats for avifauna, in particular, habitat that supports rare, threatened or endangered birds and/or exceptionally large congregations of shorebirds and/or waterfowl. The digitization of Important Bird Areas represents an important first step in conservation planning of these critical habitats using GIS. For more information, visit: <a href="http://docs.audubon.org/sites/default/files/documents/auduboncalifornia_gtr_iba_200812.pdf">http://docs.audubon.org/sites/default/files/documents/auduboncalifornia_gtr_iba_200812.pdf</a></p>	<a href="https://www.audubon.org/important-bird-areas">https://www.audubon.org/important-bird-areas</a>
108	Habitat and Biodiversity	Fish Passage Barriers - Total	CA Department of Fish and Wildlife	Fish passage barriers are barriers that prevent the movement of aquatic species that travel from the ocean to freshwater to breed. Barriers can be structures like dams, road crossings, culverts, or other structures that prevent the movement of fish.	<a href="https://map.dfg.ca.gov/metadata/ds0069.html">https://map.dfg.ca.gov/metadata/ds0069.html</a>

Attachment: ATTACHMENT C - SoCal Greenprint Proposed Data Layer List (SoCal Greenprint Update)

# Attachment C - SoCal Greenprint Proposed Data Layer List

SoCal Greenprint

Proposed Data Layers for Inclusion

July Version (update 2)

#	Theme	Data Name	Source	Description	Additional Information
109	Habitat and Biodiversity	Wildlife Movement Barrier Priorities	CA Department of Fish and Wildlife	This dataset represents barriers to terrestrial wildlife movement in California that are high priority for remediation, as identified by the California Department of Fish and Wildlife (CDFW) in March 2020. CDFW divides the state into six administrative Regions. CDFW staff in each Region identified linear segments of infrastructure that currently present barriers to wildlife populations in their jurisdiction. In doing so, the Regions used all available empirical information in their possession, including existing connectivity and road crossing studies, collared-animal movement data, roadkill observations, and professional expertise. The dataset represents the ten highest priority barriers identified in each region. Additional information can be found in this report: <a href="http://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=178511">http://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=178511</a>	<a href="https://tnc.maps.arcgis.com/home/item.html?id=4b5afe427fc443f3aaccb1f192794fa">https://tnc.maps.arcgis.com/home/item.html?id=4b5afe427fc443f3aaccb1f192794fa</a>
110	Habitat and Biodiversity	Vernal pools	CA Department of Fish and Wildlife	Vernal pools are seasonal depression wetlands that are covered by shallow water for variable periods from winter to spring, but may be completely dry for most of the summer and fall. These wetlands range in size from small puddles to shallow lakes and are usually found in a gently sloping plain of grassland.	<a href="https://map.dfg.ca.gov/metadata/ds0948.html">https://map.dfg.ca.gov/metadata/ds0948.html</a>
111	Habitat and Biodiversity	Fish Passage Barriers - Priority	CA Department of Fish and Wildlife	Human-made barriers to salmonid migration, including road-stream crossings, irrigation diversions, and dams, that have been deemed priorities for removal by the California Department of Fish and Wildlife based on significance to fish migration. Migration passage impediments and delays affect both adult and juvenile fish. Given the magnitude and severity of barriers and the decline of salmonid populations, reconnecting isolated stream habitat is an important priority for the restoration of impaired anadromous salmon and steelhead stocks. The Passage Assessment Database (PAD) is an ongoing map-based inventory of known and potential barriers to anadromous fish in California, compiled and maintained through a cooperative interagency agreement.	<a href="https://www.calfish.org/ProgramsData/HabitatandBarriers/CaliforniaFishPassageAssessmentDatabase.aspx">https://www.calfish.org/ProgramsData/HabitatandBarriers/CaliforniaFishPassageAssessmentDatabase.aspx</a>
112	Habitat and Biodiversity	Species Biodiversity Rank	CA Department of Fish and Wildlife ACE	Species Biodiversity Summaries combine the three measures of biodiversity developed for ACE into a single metric. These three measures include: 1) native species richness, which represents overall native diversity of all species in the state, both common and rare, as well as climate vulnerable species and important game and sport fish species; 2) rare species richness, which represents diversity of rare species; and, 3) irreplaceability, which is a weighted measure of endemism that highlights areas that support unique species of limited range.	<a href="https://wildlife.ca.gov/Data/Analysis/ACE">https://wildlife.ca.gov/Data/Analysis/ACE</a>

Attachment: ATTACHMENT C - SoCal Greenprint Proposed Data Layer List (SoCal Greenprint Update)

# Attachment C - SoCal Greenprint Proposed Data Layer List

SoCal Greenprint

Proposed Data Layers for Inclusion

July Version (update 2)

#	Theme	Data Name	Source	Description	Additional Information
113	Habitat and Biodiversity	California Natural Diversity Database (CNDDDB)	CA Department of Fish and Wildlife CA Natural Diversity DataBase	The California Natural Diversity Database (CNDDDB) is a product of the California Department of Fish and Wildlife's Biogeographic Data Branch (BDB). The CNDDDB is both a manual and computerized library of the status and locations of California's rare species and natural community types. The CNDDDB includes in its data all federally and state listed plants and animals, all species that are candidates for listing, all species of special concern, and those species that are considered "sensitive" by government agencies and the conservation community.	<a href="https://wildlife.ca.gov/Data/CNDDDB">https://wildlife.ca.gov/Data/CNDDDB</a>
114	Habitat and Biodiversity	Wildland Carbon	California Air Resources Board	Total carbon density. This raster includes values for pixels that are croplands. Units: Metric tons carbon/ha [carbon density of wildland Above-Ground Live vegetation (Metric Tons Carbon/ha) note: biomass to carbon conversion factor is 0.47 g carbon/g biomass (from Gonzalez et al. 2015)].	<a href="https://nature.berkeley.edu/battleslab/wp-content/uploads/2015/03/Gonzalez-et-al.-2015.pdf">https://nature.berkeley.edu/battleslab/wp-content/uploads/2015/03/Gonzalez-et-al.-2015.pdf</a> (Data available through request)
115	Habitat and Biodiversity	Conservation Easements	California Conservation Easements Database	CCED is a GIS database defining easements and deed-based restrictions on private land. These restrictions limit land uses to those compatible with maintaining it as open space. Lands under easement may be actively farmed, grazed, forested, or held as nature reserves. Easements are typically held on private lands with no public access.	<a href="https://www.calands.org/cced/">https://www.calands.org/cced/</a>
116	Habitat and Biodiversity	Groundwater Dependent Ecosystems	California Department of Water Resources	Groundwater Dependent Ecosystems are defined under the Sustainable Groundwater Management Act (SGMA) as "ecological communities or species that depend on groundwater emerging from aquifers or on groundwater occurring near the ground surface."	<a href="https://groundwaterresourcehub.org/sgma-tools/mapping-indicators-of-gdes/">https://groundwaterresourcehub.org/sgma-tools/mapping-indicators-of-gdes/</a>
117	Habitat and Biodiversity	Land owned by recreation/conservation organization	California Protected Area Database (CPAD)	Land that is protected for its recreation and conservation benefits by a recreation or conservation organization.	<a href="https://www.calands.org/cpad/">https://www.calands.org/cpad/</a>
118	Habitat and Biodiversity	eBird	Cornell Lab of Ornithology	eBird data document bird distribution, abundance, habitat use, and trends through checklist data collected within a simple, scientific framework. Birders enter when, where, and how they went birding, and then fill out a checklist of all the birds seen and heard during the outing.	<a href="https://ebird.org/home">https://ebird.org/home</a>

Attachment: ATTACHMENT C - SoCal Greenprint Proposed Data Layer List (SoCal Greenprint Update)

# Attachment C - SoCal Greenprint Proposed Data Layer List

SoCal Greenprint

Proposed Data Layers for Inclusion

July Version (update 2)

#	Theme	Data Name	Source	Description	Additional Information
119	Habitat and Biodiversity	Antelope Valley RCIS Cores and Linkages	Desert Mountains Conservation Authority, and Antelope Valley Regional Conservation Investment Strategy Steering Committee	The RCIS area was divided into 15 core habitat areas and 18 landscape linkages for connecting the habitat core areas (or connecting to habitat outside the RCIS area). The habitat core areas and landscape linkages were identified using the conservation values maps from each of the three species groups, the habitat connectivity maps for large and small species, the landscape intactness map, the protected lands map, and the climate stability and climate refugia maps. The core habitat areas (cores) are large, contiguous patches of habitat with higher conservation value, and the linkages are important swaths of habitat that link the cores together to allow species to move and disperse between the habitat core areas and to areas outside of the RCIS area.	<a href="https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=175455&amp;inline">https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=175455&amp;inline</a>
120	Habitat and Biodiversity	Soil Carbon	Hengl et al. 2017	The carbon content in soil organic matter from microorganisms, root exudates, decomposed organisms, and soil biota. Soil organic carbon storage is summarized to a depth of 30cm.	<a href="https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0169748">https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0169748</a>
121	Habitat and Biodiversity	HerpMapper Occurrence Data	HerpMapper	Occurrence data for amphibians and reptiles collected by citizen science observations.	<a href="https://www.herpMapper.org/">https://www.herpMapper.org/</a>
122	Habitat and Biodiversity	iNaturalist	iNaturalist - a joint initiative between the CalAcademy of Science and the National Geographic Society	iNaturalist is a citizen science app that allows individuals to record species observations. Observations were downloaded from the Global Biodiversity Information Facility in February 2020.	<a href="https://www.inaturalist.org/">https://www.inaturalist.org/</a>
123	Habitat and Biodiversity	Hotspots of species requiring mitigation - pending transit projects	Patrick Huber - UC Davis	Cumulative hectares of suitable habitat in a 25-hectare region for species that may be impacted by proposed transportation projects in the next two decades. These species have some regulatory protective status that requires compensatory action to mitigate development impacts.	Methods for similar work in the Bay Area described here: <a href="https://tnc.box.com/s/npv1vj3x4h3qozzg3k5dtg8dfoxx91no">https://tnc.box.com/s/npv1vj3x4h3qozzg3k5dtg8dfoxx91no</a>

Attachment: ATTACHMENT C - SoCal Greenprint Proposed Data Layer List (SoCal Greenprint Update)

# Attachment C - SoCal Greenprint Proposed Data Layer List

SoCal Greenprint

Proposed Data Layers for Inclusion

July Version (update 2)

#	Theme	Data Name	Source	Description	Additional Information
124	Habitat and Biodiversity	South Coast Missing Linkages	South Coast Missing Linkages	The South Coast Missing Linkages project is a comprehensive plan for a regional network that would maintain and restore critical habitat linkages between existing reserves. These linkages form the backbone of a conservation strategy for southern California where the whole would be greater than the sum of the parts. South Coast Missing Linkages is a highly collaborative inter-agency effort to identify and conserve the highest-priority linkages in the South Coast Ecoregion. Partners include South Coast Wildlands, National Park Service, U.S. Forest Service, California State Parks, The Wildlands Conservancy, The Resources Agency, California State Parks Foundation, The Nature Conservancy, Santa Monica Mountains Conservancy, Resources Legacy Foundation, Conservation Biology Institute, San Diego State University Field Stations Program, Environment Now, Mountain Lion Foundation, and the Zoological Society of San Diego's Conservation and Research for Endangered Species, among others. Cross-border alliances have also been formed with Pronatura, Universidad Autonoma de Baja California, Terra Peninsular, and Conabio, in recognition of our shared vision for ecological connectivity across the border into Baja.	<a href="http://www.scwildlands.org/">http://www.scwildlands.org/</a>
125	Habitat and Biodiversity	Resilient Connected Network (All)	The Nature Conservancy	We combined the sites and linkages identified by the combination of resilience, flow, and biodiversity into a single network. The network is designed to represent resilient examples all the characteristic environments of the region while maximizing amount of diversity contained within in them and the natural flow that connects them. 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	<a href="https://storymaps.arcgis.com/stories/86c89e79e9bf405cac71a71a0fd933590">https://storymaps.arcgis.com/stories/86c89e79e9bf405cac71a71a0fd933590</a>  <a href="https://www.nature.org/en-us/what-we-do/our-priorities/protect-water-and-land/land-and-water-stories/climate-resilient-network/">https://www.nature.org/en-us/what-we-do/our-priorities/protect-water-and-land/land-and-water-stories/climate-resilient-network/</a>  <a href="https://maps.tnc.org/resilientland/">https://maps.tnc.org/resilientland/</a>

Attachment: ATTACHMENT C - SoCal Greenprint Proposed Data Layer List (SoCal Greenprint Update)

# Attachment C - SoCal Greenprint Proposed Data Layer List

SoCal Greenprint

Proposed Data Layers for Inclusion

July Version (update 2)

#	Theme	Data Name	Source	Description	Additional Information
126	Habitat and Biodiversity	Mojave Desert Ecoregional Assessment	The Nature Conservancy	This dataset presents the results of an analysis to characterize the distribution of conservation values across the Mojave Desert Ecoregion. Using an ecoregional planning approach followed worldwide by The Nature Conservancy and its partners, we identified a suite of conservation targets (521 species, 44 ecological systems, and seeps and springs are the focus of the plan) and set quantitative conservation goals for each target. We also characterized land-use impacts across the desert, such as roads, urban areas, and agricultural uses. We then used Marxan conservation planning software to help identify and map the relative conservation value of lands across the region for meeting the stated conservation goals. Our analysis involved dividing the entire Mojave Desert Ecoregion into one-square-mile (259-hectare) planning units, synthesizing spatially-explicit information on the conservation targets and anthropogenic disturbance found in each planning unit, and then using this information to identify the relative value of each planning unit in meeting our conservation goals. High conservation value was attributed to areas with low levels of disturbance and unique conservation target occurrences or high concentrations of target occurrences.	<a href="https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0207678">https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0207678</a>
127	Habitat and Biodiversity	West Mojave Least Conflict Assessment	The Nature Conservancy	This is a final summary result of an analysis conducted by The Nature Conservancy to implement the recommendations outlined by environmental NGOs in the white paper "Renewable Siting Criteria for California Desert Conservation Area" dated June 29, 2009. We identified data sources to represent areas that are high conflict based on that white paper as well as land use conditions that might enable least conflict siting for solar development. This grid is a combination of the land use disturbance categories and the spatial scale of conflict factors to use as the draft "Matrix" of areas based on the relative conflict. See report for full sources. For complete methods and inputs, see the associated report, entitled: Solar Energy Development in the Western Mojave Desert: Identifying Areas of Least Environmental Conflict for Siting and a Framework for Compensatory Mitigation of Impacts.	<a href="https://www.scienceforconservation.org/assets/downloads/West-Mojave-Assessment-2012.pdf">https://www.scienceforconservation.org/assets/downloads/West-Mojave-Assessment-2012.pdf</a>
128	Habitat and Biodiversity	Coastal Conservation Strategy	The Nature Conservancy Conserving CA Coastal Habitat	This report assesses whether a coastal area is vulnerable, resilient, adaptive, or other. We measure the resilience of coastal areas to climate change and vulnerability to the impacts of climate change. This dataset identifies opportunities for conservation strategies to maintain coastal habitat area in the face of sea level rise.	<a href="https://scc.ca.gov/2018/05/15/coastalassessment/">https://scc.ca.gov/2018/05/15/coastalassessment/</a>

Attachment: ATTACHMENT C - SoCal Greenprint Proposed Data Layer List (SoCal Greenprint Update)

# Attachment C - SoCal Greenprint Proposed Data Layer List

SoCal Greenprint

Proposed Data Layers for Inclusion

July Version (update 2)

#	Theme	Data Name	Source	Description	Additional Information
129	Habitat and Biodiversity	Connectivity	The Nature Conservancy Omniscape	<p>Borrowing principles of resistance and flow from electrical engineering, The Nature Conservancy in California mapped ecological connectivity throughout the state. Omniscape is a novel approach that applies a "moving window" to Circuitscape to enable a wall-to-wall characterization of the contribution of all areas to a connected landscape. It avoids the need to designate core areas and instead, it requires only three parameters which address the following questions:</p> <p>Where are animals moving from and to?                      How will they respond to various levels of human disturbance?                      And how far are they likely to go?</p>	<a href="https://omniscape.codefornature.org/#/analysis-tour_3">https://omniscape.codefornature.org/#/analysis-tour_3</a>
130	Habitat and Biodiversity	Urban tree carbon	UC Davis Statewide Assessment of Urban Forests Project to the California Fire Urban and Community Forestry Program	The estimated amount of carbon (measured in Metric Tons of CO2-equivalent) stored in street trees in urban areas.	<a href="https://escholarship.org/uc/item/8r83z5wb">https://escholarship.org/uc/item/8r83z5wb</a>
131	Habitat and Biodiversity	National Wetlands Inventory	US Fish and Wildlife Service	"The US FWS National Wetlands Inventory (NWI) is a publicly available resource that provides detailed information on the abundance, characteristics, and distribution of US wetlands. NWI data are used by natural resource managers, within the US FWS and throughout the Nation, to promote the understanding, conservation and restoration of wetlands" (USFS)	<a href="https://www.fws.gov/wetlands/">https://www.fws.gov/wetlands/</a>
132	Water Resources	Wells and Change in Groundwater Level	CA Department of Water Resources	This dataset depicts change in groundwater level at selected monitoring locations (wells) between two specified years, by season. Change values represent change in groundwater level (elevation) by year and season (fall or spring). Other information on the monitoring location is also included. Positive values indicate groundwater has risen (groundwater surface elevation has increased) from the early year to the late year, while negative values indicate groundwater level surface has fallen (decreased in elevation ) from the early year to the late year. Water level monitoring locations and measurements used are selected based on measurement date and well construction information, where available, and approximate groundwater levels in the unconfined to uppermost semi-confined aquifers. For more information on this service, please contact <a href="mailto:gis@water.ca.gov">gis@water.ca.gov</a>	<a href="https://gis.water.ca.gov/arcgis/rest/services/Geoscientific/i08_GroundwaterLevelChangeSeasonal_Points/FeatureServer/0">https://gis.water.ca.gov/arcgis/rest/services/Geoscientific/i08_GroundwaterLevelChangeSeasonal_Points/FeatureServer/0</a>
133	Water Resources	Hydrogeologically Vulnerable areas	CA State Water Board	Areas over aquifers where soil or rock conditions enable higher rates of recharge and therefore make the aquifer more vulnerable (or susceptible) to surface contaminants.	<a href="https://www.waterboards.ca.gov/gama/docs/hva_map_table.pdf">https://www.waterboards.ca.gov/gama/docs/hva_map_table.pdf</a>

Attachment: ATTACHMENT C - SoCal Greenprint Proposed Data Layer List (SoCal Greenprint Update)

**DRAFT**

# Attachment C - SoCal Greenprint Proposed Data Layer List

SoCal Greenprint

Proposed Data Layers for Inclusion

July Version (update 2)

#	Theme	Data Name	Source	Description	Additional Information
134	Water Resources	Points of diversion	CA Water Resources Control Board	Points of Diversion (PODs) are locations where water is being drawn from a surface water source such as a stream or river. Each water right registered with the California State Water Resources Control Board's Division of Water Rights includes an identified point of diversion. Ground water extraction points (such as water supply wells) are generally not included in this dataset.	<a href="https://gispublic.waterboards.ca.gov/portal/home/index.html">https://gispublic.waterboards.ca.gov/portal/home/index.html</a>
135	Water Resources	Overdrafted groundwater basins	California Department of Water Resources	The Sustainable Groundwater Management Act (SGMA) directs the Department of Water Resources (DWR) to identify groundwater basins and subbasins in conditions of critical overdraft. As defined by SGMA, "A basin is subject to critical overdraft when continuation of present water management practices would probably result in significant adverse overdraft-related environmental, social, or economic impacts."  Overdraft occurs where the average annual amount of groundwater extraction exceeds the long-term average annual supply of water to the basin. Effects of overdraft can include seawater intrusion, land subsidence, groundwater depletion, and/or chronic lowering of groundwater levels.	<a href="https://water.ca.gov/Programs/Groundwater-Management/Bulletin-118/Critically-Overdrafted-Basins">https://water.ca.gov/Programs/Groundwater-Management/Bulletin-118/Critically-Overdrafted-Basins</a>
136	Water Resources	Priority Groundwater Basins	California Department of Water Resources	California Statewide Groundwater Elevation Monitoring priority basins are determined by the California Department of Water Resources (CDWR) according to the following criteria: overlying population, projected growth of overlying population; public supply wells; total wells; overlying irrigated acreage; reliance on groundwater as the primary source of water; impacts on the groundwater, including overdraft, subsidence, saline intrusion, and other water quality degradation; and any other information determined to be relevant by CDWR.	<a href="https://water.ca.gov/Programs/Groundwater-Management/Basin-Prioritization">https://water.ca.gov/Programs/Groundwater-Management/Basin-Prioritization</a>
137	Water Resources	Adjudicated groundwater basins	California Department of Water Resources	Priority Groundwater basins, in combination with adjudicated areas which have existing governance and oversight in place, account for 98 percent of the pumping (20 million acre-feet), 83 percent of the population (25 million Californians), and 88 percent of all irrigated acres (6.7 million acres) within the state's groundwater basins. Twenty-one of these basins were previously identified as Critically Overdrafted.	<a href="https://water.ca.gov/Programs/Groundwater-Management/Basin-Prioritization">https://water.ca.gov/Programs/Groundwater-Management/Basin-Prioritization</a>
138	Water Resources	Water Quality Index from the Relative Stream Health Index	California Integrated Assessment of Watershed Health - US Environmental Protection Agency	The water quality index includes information about stream conductivity, stream nitrate concentration, and stream turbidity.	<a href="https://www.mywaterquality.ca.gov/monitoring_council/healthy_streams/docs/ca_hw_report_111213.pdf">https://www.mywaterquality.ca.gov/monitoring_council/healthy_streams/docs/ca_hw_report_111213.pdf</a>

Attachment: ATTACHMENT C - SoCal Greenprint Proposed Data Layer List (SoCal Greenprint Update)

**DRAFT**

# Attachment C - SoCal Greenprint Proposed Data Layer List

SoCal Greenprint

Proposed Data Layers for Inclusion

July Version (update 2)

#	Theme	Data Name	Source	Description	Additional Information
139	Water Resources	Naturalness of Active River Areas	California Integrated Assessment of Watershed Health - US Environmental Protection Agency	Those parts of the Active River Area that are still in a natural or semi-natural condition and are assumed to contribute to healthy river/stream function and water-related ecosystem services. These parts include the material contribution areas, the meander belts, the floodplains, and riparian wetlands of a river or stream. The degree of naturalness is used as an indicator of watershed health in the California Integrated Assessment of Watershed Health.	<a href="https://www.epa.gov/sites/production/files/2015-11/documents/ca_hw_report_111213_0.pdf">https://www.epa.gov/sites/production/files/2015-11/documents/ca_hw_report_111213_0.pdf</a>
140	Water Resources	Mapped Stream Course	National Hydrography Dataset - US Geological Survey	Mapped stream courses showing streams, rivers, and other linear water bodies.	<a href="https://www.usgs.gov/core-science-systems/nqp/national-hydrography">https://www.usgs.gov/core-science-systems/nqp/national-hydrography</a>
141	Water Resources	Pollutant Loading (Greater LA County)	The Nature Conservancy	A unitless Pollutant Loading metric was created by summing estimated loading for fecal coliform, Total Copper (Cu), Total Lead (Pb) and Total Zinc (Zn) for land use polygons within each Census Block. Fecal coliform and metals were chosen because they are common pollutants for which Total Maximum Daily Loads are in place in the Los Angeles Region and they are indicative of exposure risk to humans and in-stream organisms respectively. The metric doesn't provide information related to absolute loading, but rather makes relative comparisons between blocks based on land use.	<a href="https://doi.org/10.1016/j.ufug.2021.127300">https://doi.org/10.1016/j.ufug.2021.127300</a>
142	Water Resources	Municipal drinking water supply watersheds	The Nature Conservancy	Using public sources of data, TNC mapped the surface drinking water sources (rivers, reservoirs, lakes, etc.) for 30 million (80%) of California's residents and the watersheds that supply water to those sources. This report evaluates the protection status and health of the watersheds supplying drinking water.	<a href="https://www.nature.org/media/california/california_drinking-water-sources-2012.pdf">https://www.nature.org/media/california/california_drinking-water-sources-2012.pdf</a>
143	Water Resources	Flow modification	U.S. Geological Survey	This dataset estimates the probability of streamflow modification for every stream segment in the coterminous U.S. The assessment is based on the integration, modeling, and synthesis of monitoring data collected by the USGS and the U.S. Environmental Protection Agency at more than 7,000 streams and rivers across the conterminous United States from 1980 to 2014.	<a href="https://www.sciencebase.gov/catalog/item/5cab5419e4b0c3b00650cbd4">https://www.sciencebase.gov/catalog/item/5cab5419e4b0c3b00650cbd4</a>
144	Water Resources	Impaired waterbodies - 303d listed water bodies	US Environmental Protection Agency	The term "303(d) list" or "list" is short for a state's list of impaired and threatened waters (e.g. stream/river segments, lakes). States are required to submit their list for EPA approval every two years. For each water on the list, the state identifies the pollutant causing the impairment, when known. In addition, the state assigns a priority for development of Total Maximum Daily Loads (TMDL) based on the severity of the pollution and the sensitivity of the uses to be made of the waters, among other factors (40 C.F.R. §130.7(b)(4)).	<a href="https://www.epa.gov/waterdata/waters-geospatial-data-downloads#CurrentStateGeospatialData">https://www.epa.gov/waterdata/waters-geospatial-data-downloads#CurrentStateGeospatialData</a>

Attachment: ATTACHMENT C - SoCal Greenprint Proposed Data Layer List (SoCal Greenprint Update)

DRAFT

# Attachment C - SoCal Greenprint Proposed Data Layer List

SoCal Greenprint

Proposed Data Layers for Inclusion

July Version (update 2)

#	Theme	Data Name	Source	Description	Additional Information
145	Water Resources	Impaired waterways - 303d listed streams	US Environmental Protection Agency	The term "303(d) list" or "list" is short for a state's list of impaired and threatened waters (e.g. stream/river segments, lakes). States are required to submit their list for EPA approval every two years. For each water on the list, the state identifies the pollutant causing the impairment, when known. In addition, the state assigns a priority for development of Total Maximum Daily Loads (TMDL) based on the severity of the pollution and the sensitivity of the uses to be made of the waters, among other factors (40 C.F.R. §130.7(b)(4)).	<a href="https://www.epa.gov/waterdata/waters-geospatial-data-downloads#CurrentStateGeospatialData">https://www.epa.gov/waterdata/waters-geospatial-data-downloads#CurrentStateGeospatialData</a>
146	Water Resources	Watersheds HUC10	US Geological Survey	The United States is divided and sub-divided into successively smaller hydrologic units which are classified into four levels: regions, subregions, accounting units, and cataloging units. The hydrologic units are arranged or nested within each other, from the largest geographic area (regions) to the smallest geographic area (cataloging units). Each hydrologic unit is identified by a unique hydrologic unit code (HUC) consisting of two to eight digits based on the four levels of classification in the hydrologic unit system.	<a href="https://www.sciencebase.gov/catalog/item/5696a727e4b039675d00a4ef">https://www.sciencebase.gov/catalog/item/5696a727e4b039675d00a4ef</a>
147	Water Resources	Groundwater Recharge	US Geological Survey	Water that penetrates below the root zone, infiltrating soils and potentially replenishing aquifers.	<a href="https://ca.water.usgs.gov/projects/reg_hydro/basin-characterization-model.html">https://ca.water.usgs.gov/projects/reg_hydro/basin-characterization-model.html</a>
148	Water Resources	Surface Water Quality Monitoring sites	US Geological Survey	The U.S. Geological Survey's (USGS) National Water Information System (NWIS) is a comprehensive and distributed application that supports the acquisition, processing, and long-term storage of water data. Nationally, USGS surface-water data includes more than 850,000 station years of time-series data that describe stream levels, streamflow (discharge), reservoir and lake levels, surface-water quality, and rainfall. The data are collected by automatic recorders and manual field measurements at installations across the Nation.	<a href="https://maps.waterdata.usgs.gov/mapper/index.html">https://maps.waterdata.usgs.gov/mapper/index.html</a>
149	Water Resources	Groundwater quality monitoring sites	US Geological Survey	The USGS National Water Information System (NWIS) contains extensive water data for the nation. The Groundwater database consists of more than 850,000 records of wells, springs, test holes, tunnels, drains, and excavations in the United States. Available site descriptive information includes well location information such as latitude and longitude, well depth, and aquifer. The USGS annually monitors groundwater levels in thousands of wells in the United States. Groundwater level data are collected and stored as either discrete field-water-level measurements or as continuous time-series data from automated recorders.	<a href="https://maps.waterdata.usgs.gov/mapper/index.html">https://maps.waterdata.usgs.gov/mapper/index.html</a>
150	Water Resources	Runoff	US Geological Survey	Water that flows over the surface of the land into streams and rivers	<a href="https://ca.water.usgs.gov/projects/reg_hydro/basin-characterization-model.html">https://ca.water.usgs.gov/projects/reg_hydro/basin-characterization-model.html</a>

Attachment: ATTACHMENT C - SoCal Greenprint Proposed Data Layer List (SoCal Greenprint Update)

DRAFT

# Attachment C - SoCal Greenprint Proposed Data Layer List

SoCal Greenprint

Proposed Data Layers for Inclusion

July Version (update 2)

#	Theme	Data Name	Source	Description	Additional Information
151	Habitat and Biodiversity	Areas of Conservation Emphasis (ACE), version 3.0, Terrestrial Connectivity	California Department of Fish and Wildlife	The Terrestrial Connectivity dataset is one of the four key components of the California Department of Fish and Wildlife's (CDFW) Areas of Conservation Emphasis (ACE) suite of terrestrial conservation information along with terrestrial Biodiversity, Significant Habitats, and Climate Resilience. The Terrestrial Connectivity dataset summarizes information on terrestrial connectivity by ACE hexagon including the presence of mapped corridors or linkages and the juxtaposition to large, contiguous, natural areas. This dataset was developed to support conservation planning efforts by allowing user to spatially evaluate the relative contribution of an area to terrestrial connectivity based on the results of statewide, regional, and other connectivity analyses.	<a href="https://wildlife.ca.gov/Data/Analysis/ACE">https://wildlife.ca.gov/Data/Analysis/ACE</a>
152	Habitat and Biodiversity	Areas of Conservation Emphasis (ACE), version 3.0, Species Biodiversity	California Department of Fish and Wildlife	Species Biodiversity Summaries combine the three measures of biodiversity developed for ACE into a single metric. These three measures include: 1) native species richness, which represents overall native diversity of all species in the state, both common and rare, as well as climate vulnerable species and important game and sport fish species; 2) rare species richness, which represents diversity of rare species; and, 3) irreplaceability, which is a weighted measure of endemism that highlights areas that support unique species of limited range.	<a href="https://wildlife.ca.gov/Data/Analysis/ACE">https://wildlife.ca.gov/Data/Analysis/ACE</a>
153	Habitat and Biodiversity	Areas of Conservation Emphasis (ACE), version 3.0, Terrestrial Native Species Richness	California Department of Fish and Wildlife	Native species richness is a measure of species biodiversity, and is one measurement used to describe the distribution of overall species biodiversity in California for the California Department of Fish and Wildlife (CDFW) Areas of Conservation Emphasis Project (ACE). Other measures of terrestrial species biodiversity included in the ACE terrestrial biodiversity summary are rare species richness and terrestrial endemism. Here, native species richness represents a count of the total number of native terrestrial species potentially present in each hexagon based on species range and distribution information. This dataset depicts the distribution of richness of all native species in the state, both common and rare. The data can be used to view patterns of species diversity, and to identify areas of highest native richness across the state and in each ecoregion. Users can view a list of species that contribute to the richness counts for each hexagon.	<a href="https://wildlife.ca.gov/Data/Analysis/ACE">https://wildlife.ca.gov/Data/Analysis/ACE</a>
154	Habitat and Biodiversity	Coachella Valley Multiple Species Habitat Conservation Plan	Coachella Valley Conservation Commission	The Coachella Valley Multiple Species Habitat Conservation Plan is a shared regional vision for balanced growth to conserve Coachella Valley's natural resources while also building a strong economy vital to our future.	<a href="https://www.cvmshcp.org/">https://www.cvmshcp.org/</a>
155	Habitat and Biodiversity	Desert Renewable Energy Conservation Plan	Bureau of Land Management	The Desert Renewable Energy Conservation Plan (DRECP) is focused on 10.8 million acres of public lands in the desert regions of seven California counties – Imperial, Inyo, Kern, Los Angeles, Riverside, San	<a href="https://www.blm.gov/programs/planning-and-nepa/plans-in-development/california/desert-renewable-energy-conservation-plan">https://www.blm.gov/programs/planning-and-nepa/plans-in-development/california/desert-renewable-energy-conservation-plan</a>

Attachment: ATTACHMENT C - SoCal Greenprint Proposed Data Layer List (SoCal Greenprint Update)

**DRAFT**

# Attachment C - SoCal Greenprint Proposed Data Layer List

SoCal Greenprint

Proposed Data Layers for Inclusion

July Version (update 2)

#	Theme	Data Name	Source	Description	Additional Information
				Bernardino, and San Diego. It is a landscape-level plan that streamlines renewable energy development while conserving unique and valuable desert ecosystems and providing outdoor recreation opportunities.	<a href="https://navigator.blm.gov/data?keyword=DRECP">https://navigator.blm.gov/data?keyword=DRECP</a>
156	Habitat and Biodiversity	Los Angeles County Significant Ecological Areas	Los Angeles County	Significant Ecological Areas (SEA) are officially designated areas within LA County with irreplaceable biological resources. The SEA Program objective is to conserve genetic and physical diversity within LA County by designating biological resource areas that are capable of sustaining themselves into the future.	<a href="https://planning.lacounty.gov/site/sea/">https://planning.lacounty.gov/site/sea/</a>
157	Habitat and Biodiversity	Lower Colorado River Multi-Species Conservation Program	Bureau of Reclamation	The Lower Colorado River Multi-Species Conservation Program (LCR MSCP) was created to balance the use of the Colorado River water resources with the conservation of native species and their habitats. The program works toward the recovery of species currently listed under the Endangered Species Act (ESA). It also reduces the likelihood of additional species listings.	<a href="https://www.lcrmscp.gov/">https://www.lcrmscp.gov/</a>
158	Habitat and Biodiversity	Conservation Assessment of Orange County	Orange County Transportation Authority	Priority Conservation Areas identified for the Conservation Assessment of Orange County, CA, complete by the Conservation Biology Institute for the Orange County Transportation Authority in 2009. Priority Conservation Areas (PCAs) identify lands based on biological criteria.	<a href="https://consbio.org/products/reports/conservation-assessment-of-orange-county">https://consbio.org/products/reports/conservation-assessment-of-orange-county</a> (Data available through request)
159	Habitat and Biodiversity	Orange County Habitat Conservation Plan	Natural Communities Coalition	The County of Orange Environmental Management Agency (EMA) has prepared a Natural Community Conservation Plan and Habitat Conservation Plan (NCCP/HCP) for the Central and Coastal Subregion of the County of Orange. The NCCP/HCP was prepared in cooperation with the California Department of Fish and Game and U.S. Fish and Wildlife Service. The primary goal of the NCCP/HCP is to protect and manage habitat supporting a broad range of plant and animal populations that now are found within the Central and Coastal Subregion.	<a href="https://occonservation.org/about-ncc/">https://occonservation.org/about-ncc/</a>
160	Habitat and Biodiversity	Upper Santa Ana River Wash Habitat Conservation Plan	San Bernardino Valley Water Conservation District	The Upper Santa Ana River Wash Habitat Conservation Plan (Wash Plan) is the culmination of two decades of coordination among Task Force partners to develop an integrated approach to permit and mitigate construction and maintenance activities within the Wash area, including water conservation, wells and water infrastructure, aggregate mining, transportation, flood control, agriculture, trails, and habitat enhancement.	<a href="https://www.sbvwd.org/santa-ana-wash-plan">https://www.sbvwd.org/santa-ana-wash-plan</a>

Attachment: ATTACHMENT C - SoCal Greenprint Proposed Data Layer List (SoCal Greenprint Update)

# Attachment C - SoCal Greenprint Proposed Data Layer List

SoCal Greenprint

Proposed Data Layers for Inclusion

July Version (update 2)

#	Theme	Data Name	Source	Description	Additional Information
161	Habitat and Biodiversity	USFWS Threatened & Endangered Species Active Critical Habitat	U.S. Fish and Wildlife Service	Spatial data for active proposed and final critical habitat for FWS only and Joint FWS/NMFS threatened and endangered species. ECOS is a FWS-sponsored platform for FWS data. The ECOS critical habitat on-line mapper includes (some, not all of the) proposed and final critical habitat for species listed as Threatened and Endangered by the FWS, or that are jointly managed by FWS/NMFS.	<a href="https://ecos.fws.gov/ecp/report/table/critical-habitat.html">https://ecos.fws.gov/ecp/report/table/critical-habitat.html</a>
162	Habitat and Biodiversity	Western Riverside Habitat Conservation Plan	Riverside County Environmental Programs Division (EPD)	The Western Riverside County Multiple Species Habitat Conservation Plan (WR-MSHCP) is a comprehensive, multi-jurisdictional Habitat Conservation Plan (HCP) focusing on conservation of species and their associated habitats in Western Riverside County. The overall goal of this plan is to maintain biological and ecological diversity within a rapidly urbanizing region. The MSHCP allows Riverside and its Cities to better control local land-use decisions and maintain a strong economic climate in the region while addressing the requirements of the state and federal Endangered Species Acts.	<a href="https://rctlma.org/epd/WR-MSHCP">https://rctlma.org/epd/WR-MSHCP</a>
163	Habitat and Biodiversity	Integrated Regional Conservation and Development	California Strategic Growth Council and the California Biodiversity Council	RePlan is a core component of the California Strategic Growth Council's (SGC) Integrated Regional Conservation and Development (IRCAD) initiative. This online tool supports the development and implementation of a sustainable and balanced vision for regional conservation and economic development.  RePlan integrates the latest environmental, social, and economic data with analytic and reporting tools to allow users to identify optimal locations for implementing California's conservation, resource management and development objectives. This tool helps to align regional planning and management activities in light of State and regional conservation, development, equity and resilience goals.	<a href="http://replan-tool.org/">http://replan-tool.org/</a>

Attachment: ATTACHMENT C - SoCal Greenprint Proposed Data Layer List (SoCal Greenprint Update)

# Attachment C - SoCal Greenprint Proposed Data Layer List

SoCal Greenprint

Proposed Data Layers for Inclusion

July Version (update 2)

#	Theme	Data Name	Source	Description	Additional Information
164	Habitat and Biodiversity	USFS Ecosystem Services Assessment	United States Forest Service	<p>Healthy forest ecosystems are ecological life-support systems. Forests provide a full suite of goods and services that are vital to human health and livelihood, natural assets we call ecosystem services. Many of these goods and services are traditionally viewed as free benefits to society, or "public goods" - wildlife habitat and diversity, watershed services, carbon storage, and scenic landscapes, for example.</p> <p>This project quantifies and economically values the following ecosystem services on the landscape: 1) Water quantity and quality, including watershed capacity to regulate erosion and sedimentation 2) Recreation opportunities 3) Carbon sequestration The project also evaluates the legal obligations and responsibilities of the Forest Service pertaining to air quality, biodiversity, energy and minerals, and cultural, tribal, and spiritual services.</p>	<a href="https://www.fs.fed.us/wwetac/brief/landscapes-SEVA5.php">https://www.fs.fed.us/wwetac/brief/landscapes-SEVA5.php</a> (Data available through request)
165	Environmental Justice, Equity, and Inclusion	Urban Heat Island, Air Temperature	University of California, Davis and the Forest Service Pacific Southwest Research Station	Urban Heat Island, Air Temperature is reported by high and medium urban heat island threat classes from the source report. Large urban areas often experience higher temperatures, greater pollution, and more negative health impacts during hot summer months, when compared to more rural communities. This phenomenon is known as the urban heat island. Heat islands are created by a combination of heat-absorptive surfaces (such as dark pavement and roofing), heat-generating activities (such as engines and generators), and the absence of vegetation (which provides evaporative cooling).	<a href="https://escholarship.org/uc/item/8r83z5wb">https://escholarship.org/uc/item/8r83z5wb</a>
166	Environmental Justice, Equity, and Inclusion	Tree Equity Score	American Forests	The Tree Equity Score tool calculates a score for all 150,000 neighborhoods and 486 municipalities in urban America. Each score indicates whether there are enough trees for everyone to experience the health, economic and climate benefits that trees provide. The scores are based on how much tree canopy and surface temperature align with income, employment, race, age and health factors.	<a href="https://www.americanforests.org/our-work/tree-equity-score/">https://www.americanforests.org/our-work/tree-equity-score/</a>

Attachment: ATTACHMENT C - SoCal Greenprint Proposed Data Layer List (SoCal Greenprint Update)

**ATTACHMENT D - Proposed Data Layer List Survey Results**

	A	B	C	D	E	F	G	H	I
	Name	Agency	Please choose the theme of the data set you would like to comment on:	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:
1									
	Melanie Schlotterbeck	Friends of Harbors, Beaches and Parks	Agriculture and Working Lands; Built Environment; Context; Environmental Justice, Equity and Inclusion; Habitat and Biodiversity; Vulnerabilities and Resilience; Water Resources	Ventura County SOAR	This is an important dataset because there are no NCCP lands in Ventura County. Ensuring this public/voter-approved measure is captured in the County is critical.	Built Environment	Public Transit Lines	This dataset helps SCAG identify and achieve other infill and refill sites across the region. This aligns with existing goals in the SCAG RTP/SCS and should be retained as the transit lines are already included in other SCAG maps.	Vulnerabilities & Resilience
2									

**ATTACHMENT D - Proposed Data Layer List Survey Results**

	A	J	K	L	M	N	O	P	Q	R
	Name	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:
1										
2	Melanie Schlotterbeck	Landscape Resilience - resilient areas; Coastal Habitat Vulnerability; Potential Future Habitat; Sea Level Rise	These types of data layers are critical to our collective understanding of how climate change impacts may impact wildlife and their ability to move across ecosystems. The Nature Conservancy is a leader in the field and this type of data makes available science for the public and non-profits like ours.; This layer is important because most governmental agencies are unable to provide this level of risk as it may be perceived to infringe on property rights. Non-profits don't have that same constraint and can offer difficult to release information that helps decision makers and planners understand the vulnerabilities.; This layer is important to our	Context	Open Space	This layer is something we, other non-profits, agencies, Resource Conservation Districts, NCCP/HCP managers and others have relied on and contribute to understand the whole picture of conservation at a regional level. This layer is the work of multiple organizations and is being used by the 30x30 Campaign with CA Natural Resources Agency to identify areas that are already conserved. It is extremely value baseline data.	Environmental Justice, Equity and Inclusion	Historic Redlining; Publicly Accessible Recreational Lands	In an era of division, this type of information, while difficult to view, is very helpful to understanding the historic inequities and injustices in our communities. To overcome JEDI issues, this data layer makes more informed decisions possible about how communities are structured.; This layer is extremely important--especially in the context of healthy, sustainable communities. The Pandemic has proven we need access to natural areas. This can be a resource for many individuals and organizations--even Cities as they plan their Trail Master Plans and Recreation/Open Space Elements.	Habitat & Biodiversity

**ATTACHMENT D - Proposed Data Layer List Survey Results**

	A	S	T	U	V	W	X	Y	Z
	Name	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please rate your understanding of the SoCalGreenprint:	Do you have any questions or concerns about the goal of the SoCal Greenprint?	The SoCal Greenprint will include:
1									
	Melanie Schlotterbeck	Connectivity; Resilient Connected Network (All); Important Bird Areas; Land Owned by Recreation/Conservation Organization; Conservation Easements; California Natural Diversity Database (CNDDDB); Conservation Assessment of Orange County	Another cutting edge layer that emphasizes a scientific approach to understanding the landscape and its connectivity/chokepoint s. The Nature Conservancy's creation and use of this layer adds credibility to the mapping effort for wildlife connectivity.; This comprehensive data set against assimilates information on a scientific basis that furthers the understanding of climate resiliency, climate mitigations, and the future adaptations. The Nature Conservancy is a widely trusted, scientifically motivated organization with subject matter expertise.; Audubon is the trusted source for all	Water Resources	Municipal Drinking Water Supply Watersheds; Pollutant Loading (Greater LA County)	This is a data set created using publicly available data. It is a no-brainer to include this as a regional asset to help manage our water resources across Southern California--especially as we continue to face drought conditions. ; The Nature Conservancy has provided a useful and substantive layer that will help stormwater and water managers, as well as transportation planners and developers because water pollution issues must be addressed as projects are constructed. This information provides important detail that can improve understanding of water quality for the region.	High	This goal meets the needs of many stakeholders.; This is a needed tool to help regional planning.; This goal covers important topics and is inclusive.; This is an excellent goal.; This tool will be widely used and we are grateful SCAG has undertaken this effort.; Ensuring transparency in outcomes and improved assurances to builders is a thoughtful approach.; This goal seems fair, transparency, accessible and inclusive to all stakeholders about to use the tool.; This goal is appropriate.; These goals are in line with what we would expect of a Greenprint. Good job.; No concerns. This seems appropriate and overlaps the different urban and natural environments well.; No, these goals have been well thought out.; This tool will be a useful and modern way to evaluate proposals and identify ways to meet the RHNA goals and conservation goals regionally.; The goal is completely appropriate and this data layer, plus the others, are helpful to understanding the intersectionality of the natural and	The SoCal Greenprint would be useful in my workflow
2									

**ATTACHMENT D - Proposed Data Layer List Survey Results**

	A	AA	AB	AC	AD	AE	AF	AG	AH
1	Name	If you think the SoCal Greenprint will be useful to you or your colleagues, please elaborate on potential use-cases or planning processes that you think the SoCal Greenprint could support?	If you have any concerns about the SoCal Greenprint, please share those concerns.	How would you like to further engage with the development of the SoCal Greenprint? (Select all that apply)					Any additional comments or questions?
2	Melanie Schlotterbeck	Yes. We already collaborate on mapping projects and this will help advance mutually agreeable goals across partnerships.; We've already researched water quality impacts, but this layer specifically will help us target where we can support water clean up efforts.; We plan to use information from this Greenprint to update the OC Green Vision Map as it relates to species and movement corridor specifics.; We plan to use the Greenprint in developing mitigation opportunities for land use and transportation projects in conjunction with our agency partners.; Yes, we already have a Greenprint we use and this will allow better use of our time with data sources in one location.; Yes, as organizations evolve with the times and become more technologically savvy--this tool will provide a framework that allows collaboration and learning across the spectrum and the region.; Yes, we are constantly trying to use the most recently tools provided to us. This is a great collaboration opportunity and allows the building community a chance to think about building healthier, more	My concern is this process has been underway for 18 months and on the docket for five years... SCAG should meet its commitment to finishing this task.; No concerns.; --; No concerns.; The only concern is ensuring SCAG meets its requirements under CEQA and NEPA.; The Greenprint should be completed by the end of the year. It has had 18 months of input and is required by the environmental documents.; None.; I have no concerns about the Greenprint, but wish to see it launched in the Fall as planned.; No, this project should	I would like to attend a webinar to get a deeper look at what the Greenprint is planned to be and what it will look like	I would like to dive in with a deeper engagement and help with the development and planning of the Greenprint	I would like to be a Beta Tester before the Greenprint is launched	I would like to stay informed about progress and release dates		This project is months from completion and The Nature Conservancy should be allowed to finish the work it is contracted to do. Democracy is built on public engagement and this tool allows for engagement.

**ATTACHMENT D - Proposed Data Layer List Survey Results**

	A	B	C	D	E	F	G	H	I
	Name	Agency	Please choose the theme of the data set you would like to comment on:	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:
1									
3	Anonymous		Habitat and Biodiversity	Connectivity	Consider including Level IV ecoregions layer so that connectivity opportunities within ecoregions/ecosystems can be considered. Also important for planning things like regional native plant lists. <a href="https://www.epa.gov/eco-research/level-iii-and-iv-ecoregions-continental-united-states">https://www.epa.gov/eco-research/level-iii-and-iv-ecoregions-continental-united-states</a> - Also consider adding watershed and subwatershed information based on USGS Hydrological Unit Codes (HUC 8 and HUC 12). Finally, consider adding historic and current indigenous community affiliation for each region (even rough or general, if available)				

**ATTACHMENT D - Proposed Data Layer List Survey Results**

	A	J	K	L	M	N	O	P	Q	R
1	Name	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:
3	Anonymous									

**ATTACHMENT D - Proposed Data Layer List Survey Results**

	A	S	T	U	V	W	X	Y	Z
	Name	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please rate your understanding of the SoCalGreenprint:	Do you have any questions or concerns about the goal of the SoCal Greenprint?	The SoCal Greenprint will include:
1	Anonymous						4		The SoCal Greenprint would be useful in my workflow
3									

**ATTACHMENT D - Proposed Data Layer List Survey Results**

	A	AA	AB	AC	AD	AE	AF	AG	AH
1	Name	If you think the SoCal Greenprint will be useful to you or your colleagues, please elaborate on potential use-cases or planning processes that you think the SoCal Greenprint could support?	If you have any concerns about the SoCal Greenprint, please share those concerns.	How would you like to further engage with the development of the SoCal Greenprint? (Select all that apply)					Any additional comments or questions?
3	Anonymous			I would like to attend a webinar to get a deeper look at what the Greenprint is planned to be and what it will look like	I would like to attend office hours to ask questions and make recommendations				

**ATTACHMENT D - Proposed Data Layer List Survey Results**

	A	B	C	D	E	F	G	H	I
	Name	Agency	Please choose the theme of the data set you would like to comment on:	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:
1									
4	Arthur Levine	Pitzer College Redford Conservancy	Agriculture and Working Lands	Community Gardens	The SoCal Greenprint would make accessing the wonderful community garden resources in and around communities easier by showing where gardens already are. We will also be able to identify where gardens are more successful and where we can prioritize placing more gardens as the local food movement grows.				
5	Carmen Ramirez	County Supervisor	Environmental Justice, Equity and Inclusion	CalEnviroScreen Pollution Burden	This is a very important tool to assess where the sacrifice zones are and where people, especially vulnerable, including children have already been exposed to pollution. Life long health consequences that we will all pay for.				

**ATTACHMENT D - Proposed Data Layer List Survey Results**

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	Name	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:
1	Arthur Levine									
4	Carmen Ramirez									
5										

**ATTACHMENT D - Proposed Data Layer List Survey Results**

	A	S	T	U	V	W	X	Y	Z
	Name	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please rate your understanding of the SoCalGreenprint:	Do you have any questions or concerns about the goal of the SoCal Greenprint?	The SoCal Greenprint will include:
1	Arthur Levine						3	Why hasn't this already been implemented? Seems like an ideal resource for any member of the public to get a better sense of their surroundings.	The SoCal Greenprint would be useful in my workflow
4	Carmen Ramirez						4	no	The SoCal Greenprint would be useful in my workflow
5									

ATTACHMENT D - Proposed Data Layer List Survey Results

	A	AA	AB	AC	AD	AE	AF	AG	AH
1	Name	If you think the SoCal Greenprint will be useful to you or your colleagues, please elaborate on potential use-cases or planning processes that you think the SoCal Greenprint could support?	If you have any concerns about the SoCal Greenprint, please share those concerns.	How would you like to further engage with the development of the SoCal Greenprint? (Select all that apply)					Any additional comments or questions?
4	Arthur Levine	We can use it to prioritize lands for conservation and development and lands that will optimize our ability to sequester carbon and grow food locally.	I would like it to do more to show the ecosystem values that come from the land.	I would like to attend a webinar to get a deeper look at what the Greenprint is planned to be and what it will look like	I would like to attend office hours to ask questions and make recommendations	I would like to dive in with a deeper engagement and help with the development and planning of the Greenprint	I would like to be a Beta Tester before the Greenprint is launched	I would like to stay informed about progress and release dates	Thank you for your work.
5	Carmen Ramirez	Give information about potential obstacles, current and future in building in particular areas. Helps to avoid destruction of natural habitats which are shrinking and in danger which are required to be preserved for everyone's quality of life.	It is a tool with information, no one should be afraid of it if it is based on information available and comports with science.	I would like to dive in with a deeper engagement and help with the development and planning of the Greenprint	I would like to stay informed about progress and release dates				

ATTACHMENT D - Proposed Data Layer List Survey Results

	A	B	C	D	E	F	G	H	I
	Name	Agency	Please choose the theme of the data set you would like to comment on:	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:
1	Christy Weir	Ventura Tree Alliance	Built Environment	City Urban Restriction Boundary (CURB) - Ventura County	Ventura County would benefit by tightening the urban boundaries. Too much sprawl.				
6	Claire Schlotterbeck	Hills For Everyone	Vulnerabilities and Resilience; Habitat and Biodiversity	Landscape Resilience - refugia; Historic Wildfire Perimeters; Fire Hazard Severity Zone	This is an important data set because it helps conservation practitioners plan for landscape level changes to habitat lands and where buffers may need to be installed to reduce climate impacts.; Any and all materials related to wildfire perimeters give planners a better understanding of the risks involved in placing housing in those locations. Keeley et al have already demonstrated that where land has burned before it will burn again--regardless of what is on the land (vegetation or houses).; Southern California is in a tricky position planning for housing in places known to burn frequently--and at an unnatural pace.	Habitat and Biodiversity	Conservation Assessment of Orange County; USFWS Threatened & Endangered Species Active Critical Habitat; Los Angeles County Significant Ecological Areas; Connectivity	The creation of this assessment tool was foundational to the success of the Regional Advanced Mitigation Program established by the Orange County Transportation Authority. Its use provides a more accurate picture of Orange County.; California is home to more than 2,100 endemic species and many of those are threatened and endangered. Understanding where those species survive and thrive is important to landowners and conservation practitioners alike.; This layer was recently updated by the County of Los Angeles and provides a very real view of the important lands within the County. It gives an understanding to the public of what the County thinks is important.; Ensuring there is accurate representation on the ground of connectivity issues, chokepoints, and priorities is critical to strategic decisions of those doing the land conservation work. Without connected landscapes our habitats and the species within them will die off due to trophic cascade and inbreeding	
7									

**ATTACHMENT D - Proposed Data Layer List Survey Results**

	A	J	K	L	M	N	O	P	Q	R
	Name	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:
1	Christy Weir									
6	Claire Schlotterbeck									
7										

**ATTACHMENT D - Proposed Data Layer List Survey Results**

	A	S	T	U	V	W	X	Y	Z
	Name	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please rate your understanding of the SoCalGreenprint:	Do you have any questions or concerns about the goal of the SoCal Greenprint?	The SoCal Greenprint will include:
1	Christy Weir						Low		I would not use the SoCal Greenprint, but have no concerns
6	Claire Schlotterbeck						High	I look forward to this tool being available to the public.; This tool is essential to the intersection of conservation, land use and transportation.; This goal is admirable and is well thought out.; SCAG has been an advocate for Regional Advanced Mitigation Programs and this tool, this data set too, will aid in that goal.; This work should be allowed to continue as promised in the Program EIR/EIS.; I'm concerned this mitigation measure will be ignored due to the BIA's efforts to dismantle the work in final months of the project.; I support the completion of the SoCal Greenprint.	The SoCal Greenprint would be useful in my workflow
7									

**ATTACHMENT D - Proposed Data Layer List Survey Results**

	A	AA	AB	AC	AD	AE	AF	AG	AH
1	Name	If you think the SoCal Greenprint will be useful to you or your colleagues, please elaborate on potential use-cases or planning processes that you think the SoCal Greenprint could support?	If you have any concerns about the SoCal Greenprint, please share those concerns.	How would you like to further engage with the development of the SoCal Greenprint? (Select all that apply)				Any additional comments or questions?	
6	Christy Weir	Ventura County SOAR (preserving agricultural land) has been beneficial and perhaps the Greenprint could encourage other counties to enact similar measures.		I would like to stay informed about progress and release dates					
7	Claire Schlotterbeck	This mapping tool will help us prioritize areas that may be more vulnerable to climate impacts and allow us to focus on those geographies first.; Yes, it will continue to benefit our work on wildfire analysis in the Puente-Chino Hills Wildlife Corridor.; Yes, it will continue to benefit our work on wildfire analysis in the Puente-Chino Hills Wildlife Corridor.; This information builds on our existing wildfire studies completed for Chino Hills State Park, but now can help us identify risky lands in the Puente Hills.; Yes, we have already used this data set to help with prioritizing conservation lands with positional attributes.; Our work spans 12 cities in Southern California... for that reason having ONE tool we can rely on for baseline information is helpful to our success regionally.; Our work spans four counties and this tool spans six. There is considerable overlap--especially as it relates to conservation planning. Understanding a broader picture will help us achieve our mission.; We've already identified critical choke points in our 31-mile long wildlife corridor. This Greenprint will aid in our effort to	This was a promised task in the SCAG RTP/SCS and PEIR. The work should be allowed to continue and be completed.	I would like to attend a webinar to get a deeper look at what the Greenprint is planned to be and what it will look like	I would like to be a Beta Tester before the Greenprint is launched				

**ATTACHMENT D - Proposed Data Layer List Survey Results**

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	Name	Agency	Please choose the theme of the data set you would like to comment on:	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:
1									
8	Eduardo Mendoza	Population Dynamics Research Group	Environmental Justice, Equity and Inclusion	CalEnviroScreen Pollution Burden	Is there going to be a layer on Superfund sites, urban oil well sites, Oil designated land use in zoning codes, and general places needed for soil remediation such as gas stations, auto body shops, etc?				
9	Eric Johnson	Puente-Chino Hills Task Force of the Sierra Club	Habitat and Biodiversity	Wildlife Movement Barrier Priorities	This data is crucial to our understanding to the movement of animals within corridors to understand what lands are important to protect.				
10	Francesca Duff	InterCanyon League	Vulnerabilities and Resilience	Wildfire Risk to Communities	Within five weeks we have had two mandatory evacuations with substantial property damage to our residents' homes. This area is of vital interest.				

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	Name	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:
1	Eduardo Mendoza									
8	Eric Johnson									
9	Francesca Duff									
10										

**ATTACHMENT D - Proposed Data Layer List Survey Results**

	A	S	T	U	V	W	X	Y	Z
	Name	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please rate your understanding of the SoCalGreenprint:	Do you have any questions or concerns about the goal of the SoCal Greenprint?	The SoCal Greenprint will include:
1	Eduardo Mendoza						2		I need to learn more to decide
8	Eric Johnson						3	No.	The SoCal Greenprint would not be useful to me, but could be useful to colleagues and partners
9	Francesca Duff						3	SoCal Greenprint meets the requirements of the environmental documents adopted in 2020 and should be completed as promised.	The SoCal Greenprint would be useful in my workflow
10									

**ATTACHMENT D - Proposed Data Layer List Survey Results**

	A	AA	AB	AC	AD	AE	AF	AG	AH
1	Name	If you think the SoCal Greenprint will be useful to you or your colleagues, please elaborate on potential use-cases or planning processes that you think the SoCal Greenprint could support?	If you have any concerns about the SoCal Greenprint, please share those concerns.	How would you like to further engage with the development of the SoCal Greenprint? (Select all that apply)				Any additional comments or questions?	
8	Eduardo Mendoza								
9	Eric Johnson	This data is crucial to our understanding to the movement of animals within corridors to understand what lands are important to protect and on which to avoid development.	I am concerned that the public has had ample opportunities to engage on this Greenprint and last-minute attempts by the Building Industry Association to end it flies in the face of the public process in creating/adopting the regional transportation plans and sustainable communities strategies.	I would like to stay informed about progress and release dates					
10	Francesca Duff	I don't currently have access to this information and it provides a way for me to view it without purchasing the needed software and training.	I am worried that SCAG's reputation for a fair, transparent and inclusive process will be lost if it decides to end the Greenprint.	I would like to attend a webinar to get a deeper look at what the Greenprint is planned to be and what it will look like	I would like to stay informed about progress and release dates				

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	A	B	C	D	E	F	G	H	I
	Name	Agency	Please choose the theme of the data set you would like to comment on:	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:
1	Francis Appiah	Caltrans	Habitat and Biodiversity	Wildlife Movement Barrier Priorities					
11	Helen Higgins	FHBP; Friends of Harbors, Beaches & Parks	Agriculture and Working Lands; Built Environment	Agritourism Locations; Projected Change in Climate Water Deficit; 2018 Noise Data	A robust economic is the backbone of any well functioning society. California is especially blessed in resources to offer so many opportunities for agritourism. We need tools like Greenprint to identify, monitor & protect resources that enhance agritourism.; Water is the #1 resource in California. We are in a catch-22 as continued drought and increase in number & scope of wildfires result in expansion of both conditions. It's crucial to have as many tools as possible, like the Greenprint, to determine all factors that contribute to climatic water deficit. An all encompassing tool like Greenprint shortens	Built Environment	2018 Noise Data	As density increases in SoCal, noise level sharply rises. Greenprint can help decision makers to balance all elements of a community.	
12									

**ATTACHMENT D - Proposed Data Layer List Survey Results**

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	Name	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:
1	Francis Appiah									
11	Helen Higgins									
12										

**ATTACHMENT D - Proposed Data Layer List Survey Results**

	A	S	T	U	V	W	X	Y	Z
	Name	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please rate your understanding of the SoCalGreenprint:	Do you have any questions or concerns about the goal of the SoCal Greenprint?	The SoCal Greenprint will include:
1	Francis Appiah						High	When will the Socal Greenprint officially available to the public?	The SoCal Greenprint would be useful in my workflow
11	Helen Higgins						4	No.; No. I understand and support 100% the goal summarized above.	The SoCal Greenprint would not be useful to me, but could be useful to colleagues and partners;The SoCal Greenprint would be useful in my workflow

**ATTACHMENT D - Proposed Data Layer List Survey Results**

	A	AA	AB	AC	AD	AE	AF	AG	AH
1	Name	If you think the SoCal Greenprint will be useful to you or your colleagues, please elaborate on potential use-cases or planning processes that you think the SoCal Greenprint could support?	If you have any concerns about the SoCal Greenprint, please share those concerns.	How would you like to further engage with the development of the SoCal Greenprint? (Select all that apply)				Any additional comments or questions?	
	Francis Appiah	Transportation will know what is out there during the project scope and develop various alternatives and mitigation of various resources that may be impacted.		I would like to attend a webinar to get a deeper look at what the Greenprint is planned to be and what it will look like		I would like to be a Beta Tester before the Greenprint is launched			
11	Helen Higgins	Greenprint can provide decision makers, builders and park/open space advocates with multiple data points for making the best decisions for community growth WITHOUT negatively subjecting residents to excessive noise.; The Greenprint will be a vital reference source in the appropriate planning of housing, infrastructure and park/open space. Many environmental organizations are not opposed to development but want to strive for the PROPER balance of building and open space.	None.	I would like to attend a webinar to get a deeper look at what the Greenprint is planned to be and what it will look like					

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	Name	Agency	Please choose the theme of the data set you would like to comment on:	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:
1	Jan Dietrick	Rincon-Vitova Insectaries	Agriculture and Working Lands	Farmland Mapping and Monitoring Program	A highly significant dataset is the use of pesticides that 1) decrease soil ecology and carbon sequestration, 2) affect farmworkers, 3) accumulate in the food supply				

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1	Name	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:
13	Jan Dietrick									

**ATTACHMENT D - Proposed Data Layer List Survey Results**

	A	S	T	U	V	W	X	Y	Z
	Name	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please rate your understanding of the SoCalGreenprint:	Do you have any questions or concerns about the goal of the SoCal Greenprint?	The SoCal Greenprint will include:
1	Jan Dietrick						3	I can't believe that pesticide use is only presented as a component of CalEnviroScreen. It is the top concern expressed by two members of the Environmental Justice Advisory Committee Catherine Garoupa White and Martha Agudelo of PSR-LA in the firs CARB workshop on NWL.. The CARB staff response was pathetic, only acknowledging two fumigants as potential aerosols and failing to connect the dots between GHG emissions and pesticide use.	I have concerns about the SoCal Greenprint

13

**ATTACHMENT D - Proposed Data Layer List Survey Results**

	A	AA	AB	AC	AD	AE	AF	AG	AH
1	Name	If you think the SoCal Greenprint will be useful to you or your colleagues, please elaborate on potential use-cases or planning processes that you think the SoCal Greenprint could support?	If you have any concerns about the SoCal Greenprint, please share those concerns.	How would you like to further engage with the development of the SoCal Greenprint? (Select all that apply)				Any additional comments or questions?	
	Jan Dietrick	My company provides biological alternatives to toxic pesticides; I also advocate to stop the unnecessary use of toxic pesticides. It is hard when the data about use is two years old before available and impacts on climate as well as farmworker and public health are ignored by state agencies in the climate and environmental justice assumptions, plans and policies. An incredible blind spot.	The lack of attention to toxic pesticide use.	I would like to attend a webinar to get a deeper look at what the Greenprint is planned to be and what it will look like	I would like to stay informed about progress and release dates				

**ATTACHMENT D - Proposed Data Layer List Survey Results**

	A	B	C	D	E	F	G	H	I
	Name	Agency	Please choose the theme of the data set you would like to comment on:	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:
1	Jennifer Savage	San Clemente	Built Environment; Context	City Urban Restriction Boundary (CURB) - Ventura County	You should include the City's open space areas, where which a zone change to non-open space requires approval of the voters of San Clemente.	Context	Open Space	The source for this layer does not include all open space, specifically lands that are locally protected for open space. Does local protection not deserve the same protection that state protected lands deserve?	
14	Jim Hines	Sierra Club	Habitat and Biodiversity	Wildlife Movement Barrier Priorities	A plan needs to be developed to guide land developments away from natural wildlife corridors				
15	Joan Taylor		Habitat and Biodiversity	Resilient Connected Network (All)	It is very important. It should include areas designated for wildlife connectivity in the desert.				
16									

**ATTACHMENT D - Proposed Data Layer List Survey Results**

	A	J	K	L	M	N	O	P	Q	R
	Name	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:
1	Jennifer Savage									
14	Jim Hines									
15	Joan Taylor									
16										

ATTACHMENT D - Proposed Data Layer List Survey Results

	A	S	T	U	V	W	X	Y	Z
	Name	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please rate your understanding of the SoCalGreenprint:	Do you have any questions or concerns about the goal of the SoCal Greenprint?	The SoCal Greenprint will include:
1	Jennifer Savage						High	Context should include all open space data of protected lands, not just CPAD lands. ; Concern: the data does not contain city level data.	The SoCal Greenprint would be useful in my workflow
14	Jim Hines						4		The SoCal Greenprint would be useful in my workflow
15	Joan Taylor						4	USA	The SoCal Greenprint would be useful in my workflow
16									

**ATTACHMENT D - Proposed Data Layer List Survey Results**

	A	AA	AB	AC	AD	AE	AF	AG	AH
1	Name	If you think the SoCal Greenprint will be useful to you or your colleagues, please elaborate on potential use-cases or planning processes that you think the SoCal Greenprint could support?	If you have any concerns about the SoCal Greenprint, please share those concerns.	How would you like to further engage with the development of the SoCal Greenprint? (Select all that apply)				Any additional comments or questions?	
14	Jennifer Savage	Enable planners and/or developers to see where development would have the least impact on the natural environment.	SCAG is missing the opportunity to protect biological resources because the context layer does not include all open space data. ; Concern: the data does not contain city level data. Concern: how will the data be updated to include the latest biological data?	I would like to attend office hours to ask questions and make recommendations					
15	Jim Hines	decisions by decision makers		I would like to stay informed about progress and release dates					
16	Joan Taylor	Planning for development in the desert		I would like to stay informed about progress and release dates					

**ATTACHMENT D - Proposed Data Layer List Survey Results**

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	Name	Agency	Please choose the theme of the data set you would like to comment on:	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:
1	Julie Coffey	UCI Nature	Habitat and Biodiversity	South Coast Missing Linkages; Important Bird Areas; Wildlife Movement Barrier Priorities	This would be an invaluable tool for us to have access to as we think about improving linkages to our own reserves to bolster isolated animal populations.; I would use this dataset to inform land use and management decisions.; Repairing habitat connectivity is an essential piece of retaining ecosystem integrity, resilience, and biodiversity in Orange County as we face unprecedented challenges. I would use this layer to help inform land and habitat management decisions and priorities.				
17									

**ATTACHMENT D - Proposed Data Layer List Survey Results**

	A	J	K	L	M	N	O	P	Q	R
1	Name	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:
17	Julie Coffey									

ATTACHMENT D - Proposed Data Layer List Survey Results

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1	Name	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please rate your understanding of the SoCalGreenprint:	Do you have any questions or concerns about the goal of the SoCal Greenprint?	The SoCal Greenprint will include:
17	Julie Coffey						3; 4	I think this is an excellent and exciting tool and an invaluable step in the right direction. For too long we have let development steer regional planning processes, with little regard for livability for all people and minimal thought of the impact on wild neighbors. Envisioning a greener future feels very needed right now, when what many see in the future is increasing fires, droughts, and heat waves.	The SoCal Greenprint would be useful in my workflow

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1	Name	If you think the SoCal Greenprint will be useful to you or your colleagues, please elaborate on potential use-cases or planning processes that you think the SoCal Greenprint could support?	If you have any concerns about the SoCal Greenprint, please share those concerns.	How would you like to further engage with the development of the SoCal Greenprint? (Select all that apply)					Any additional comments or questions?
17	Julie Coffey	Improving regional coordination and project planning for biodiversity protection, especially in coastal Orange county.; Biodiversity layers such as this one would be highly useful in determining priority areas for restoration or mitigation, and conservation around campus lands and reserves.; Land management/land use decisions, protection of sensitive habitat and species	I am concerned it faces challenges from interests that prefer the status quo & are dragging their feet and slowing us all down from envisioning a better future.	I would like to attend a webinar to get a deeper look at what the Greenprint is planned to be and what it will look like	I would like to attend office hours to ask questions and make recommendations	I would like to dive in with a deeper engagement and help with the development and planning of the Greenprint	I would like to be a Beta Tester before the Greenprint is launched	I would like to stay informed about progress and release dates	

ATTACHMENT D - Proposed Data Layer List Survey Results

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	Name	Agency	Please choose the theme of the data set you would like to comment on:	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:
1	Lena Yee Hayashi	Sea and Sage Audubon	Environmental Justice, Equity and Inclusion; Habitat and Biodiversity	Park Access - Park Acres per Thousand		Habitat and Biodiversity	Important Bird Areas	I have been a birder and volunteer surveyor of areas in OC since 1995 and submit all my data to eBird to aid in their conservation efforts and understanding of bird distribution and status	
18	María Elena Ramirez		Built Environment; Context	City Urban Restriction Boundary (CURB) - Ventura County		Context	Zoning - Ventura County		
19									
20									

**ATTACHMENT D - Proposed Data Layer List Survey Results**

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1	Lena Yee Hayashi									
18	María Elena Ramirez									
19										
20										

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	Name	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please rate your understanding of the SoCalGreenprint:	Do you have any questions or concerns about the goal of the SoCal Greenprint?	The SoCal Greenprint will include:
1	Lena Yee Hayashi						4		The SoCal Greenprint would be useful in my workflow
18	María Elena Ramirez						2		I need to learn more to decide
19									
20									

**ATTACHMENT D - Proposed Data Layer List Survey Results**

	A	AA	AB	AC	AD	AE	AF	AG	AH
1	Name	If you think the SoCal Greenprint will be useful to you or your colleagues, please elaborate on potential use-cases or planning processes that you think the SoCal Greenprint could support?	If you have any concerns about the SoCal Greenprint, please share those concerns.	How would you like to further engage with the development of the SoCal Greenprint? (Select all that apply)				Any additional comments or questions?	
18	Lena Yee Hayashi	It will help to know what areas we need to put time into to protect from destruction.; Too often open space and degraded habitats are developed in heavily urban areas because low income housing is the critical issue. However, quality of life in those urban areas should be the priority, More housing makes for denser populated communities. Natural, passive parks in areas of open space provide the opportunity to enjoy fresh air and good health by getting out to explore within walking distance of their homes. Specifically the area at the mouth of the Santa Ana River which is the only open space left in the adjacent cities of Costa Mesa, Huntington Beach and Newport Beach.; Purchase, restore and maintain coastal wetlands, riparian and upland habitats especially where there are endangered and species of concern, both flora and fauna.	There are many areas in Orange County that are important for birds as described in Important Bird Areas of California by Dan Cooper. I would hope SoCal Greenprint will make sure such areas are protected, restored and maintained, as birds indicate how healthy the habitats are;; Concern that the mouth of the Santa Ana River will be further developed and destroy the environmentally and ecologically valuable 1,000 acres at the mouth of the SAR.; There is always the concern that the little open space and degraded habitats would be designated	I would like to attend a webinar to get a deeper look at what the Greenprint is planned to be and what it will look like					
19	María Elena Ramirez			I would like to attend a webinar to get a deeper look at what the Greenprint is planned to be and what it will look like				I would like to stay informed about progress and release	
20									

**ATTACHMENT D - Proposed Data Layer List Survey Results**

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	Name	Agency	Please choose the theme of the data set you would like to comment on:	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:
1	Moises Cisneros	Sierra Club	Habitat and Biodiversity	Wildland Carbon	A complicating factor in desert carbon modeling is an assumption that inorganic carbon cannot be included in carbon modeling because we are unable to increase inorganic carbon, and therefore we cannot plan to manage it. While it is true that we cannot increase inorganic carbon stores, we certainly can degrade the capacity for carbon sequestration and storage in desert soils by land management practices that allow for vegetation removal and soil disturbance. Another complicating factor is that the desert ecosystem is not homogeneous, but instead is a mix of varied topographic and geologic features, habitats,				
21									

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21	Moises Cisneros									

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1	Moises Cisneros						3	This can be a great tool! Thank you for your hard work and efforts. We encourage you to include input from scientists who have a niche understanding of below-ground carbon sequestration such as Dr. Michael Allen, and Robin Kobaly.	The SoCal Greenprint would be useful in my workflow

21

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1	Name	If you think the SoCal Greenprint will be useful to you or your colleagues, please elaborate on potential use-cases or planning processes that you think the SoCal Greenprint could support?	If you have any concerns about the SoCal Greenprint, please share those concerns.	How would you like to further engage with the development of the SoCal Greenprint? (Select all that apply)					Any additional comments or questions?
21	Moises Cisneros	Environmental groups want to work with solar energy developers to ensure a win win for the desert eco-system and our renewable energy needs.	Existing datasets do not convey the complexity of the carbon sequestration happening below ground.	I would like to attend a webinar to get a deeper look at what the Greenprint is planned to be and what it will look like	I would like to attend office hours to ask questions and make recommendations	I would like to dive in with a deeper engagement and help with the development and planning of the Greenprint	I would like to be a Beta Tester before the Greenprint is launched	I would like to stay informed about progress and release dates	

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1	Nina Danza	- None -	Vulnerabilities and Resilience	100-Year Floodplain	100 and 500 year FEMA Flood Insurance Rate Maps have failed to provide flood protection for the last 25 years and damages are increasing dramatically with larger more frequent storm events due to climate change. DO NOT USE FIRM MAPS for determining flood protection. DELINEATE historic and accurate floodplain and STOP BUILDING IN IT. RECONNECT floodplain to their river/stream. RESTORE built floodplain to unbuilt conditions.				
22	Norman Powell	Laguna Canyon Conservancy	Habitat and Biodiversity	Land Owned by Recreation/Conservation Organization					
23	Robert O'Riley	County of Ventura	Agriculture and Working Lands	Ventura County SOAR	I believe that SOAR is what sets Ventura County apart from its sister counties. Protecting farmland and securing green space allows our County to remain a leader in agriculture and farming.				
24									

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1	Nina Danza									
22	Norman Powell									
23	Robert O'Riley									
24										

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1	Nina Danza						2		I need to learn more to decide
22	Norman Powell						3		The SoCal Greenprint would not be useful to me, but could be useful to colleagues and partners
23	Robert O'Riley						4	I am concerned that all of environmental protections, which I am in favor of, will impede our ability to tackle the homeless crisis in a timely manner. I am referring mostly to encampments in our river bottom and the ecosystem it effects.	The SoCal Greenprint would be useful in my workflow
24									

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	Name	If you think the SoCal Greenprint will be useful to you or your colleagues, please elaborate on potential use-cases or planning processes that you think the SoCal Greenprint could support?	If you have any concerns about the SoCal Greenprint, please share those concerns.	How would you like to further engage with the development of the SoCal Greenprint? (Select all that apply)				Any additional comments or questions?	
1	Nina Danza		Too much planning, not enough action to reduce CO2 emissions NOW. There is enough known to make measurable steps NOW. MORE zero emissions transportation, more protected bike infrastructure. MORE nature based flood protection. NOT MORE PLANS.						I don't want to be further engaged
22	Norman Powell								I would like to attend a webinar to get a deeper look at what the Greenprint is planned to be and what it will look like
23	Robert O'Riley	In order to protect, restore or enhance any area, I think it would be good to know not only where it is but also it is important to know the makeup of the area.							I would like to attend a webinar to get a deeper look at what the Greenprint is planned to be and what it will look like
24									

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	Name	Agency	Please choose the theme of the data set you would like to comment on:	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:
1									
25	Ruth Lorentz	City of Big Bear Lake	Habitat and Biodiversity	Land Owned by Recreation/Conservation Organization	Please include Big Bear area land owned by conservation trusts				
26	Scott Breeden	Inter-Canyon League	Context	Open Space	Open space data would be very useful as part of understanding land use issues and responding appropriately to proposed changes.				

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1										
	Ruth Lorentz									
25										
	Scott Breeden									
26										

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1									
	Ruth Lorentz						4		The SoCal Greenprint would be useful in my workflow
25									
	Scott Breeden						3		The SoCal Greenprint would be useful in my workflow
26									

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	A	AA	AB	AC	AD	AE	AF	AG	AH
1	Name	If you think the SoCal Greenprint will be useful to you or your colleagues, please elaborate on potential use-cases or planning processes that you think the SoCal Greenprint could support?	If you have any concerns about the SoCal Greenprint, please share those concerns.	How would you like to further engage with the development of the SoCal Greenprint? (Select all that apply)				Any additional comments or questions?	
25	Ruth Lorentz			I would like to stay informed about progress and release dates					
26	Scott Breeden	The SoCal Greenprint would be useful to the Inter-Canyon League in evaluating the impact of existing or proposed land use regulations on our community's rural environment.	I would be concerned by any efforts to throw away or otherwise suppress existing data out of fear that it might impact somebody's short-term financial interests.	I would like to stay informed about progress and release dates					

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1	Steven W Nash	Retired	Water Resources	Overdrafted Groundwater Basins	As a layperson I am extremely concerned about the groundwater basins overseen by the Fox Canyon Groundwater Management Agency. As the SGMA grinds its way forward I still foresee continued depletion of the pertinent aquifers with associated ground subsidence, seawater intrusion and degradation of the existing groundwater in terms of TDS and other contamination from surface sources, particularly those generated by agricultural and hydrocarbon extraction processes.				
27	Susan Skinner	SCPMG	Agriculture and Working Lands; Built Environment; Vulnerabilities and Resilience	Projected Change in Climate Water Deficit	Please include this.	Built Environment	Desert Renewable Energy Conservation Plan (DRECP) Development Focus Areas & Variance Lands		Vulnerabilities and Resilience
28									

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1	Steven W Nash									
27	Susan Skinner	Projected High Heat Days (100 degrees, mid century, slow action); Sea Level Rise								
28										

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1	Steven W Nash								I need to learn more to decide
27	Susan Skinner					3		United States	The SoCal Greenprint would not be useful to me, but could be useful to colleagues and partners; The SoCal Greenprint would be useful in my workflow
28									

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	A	AA	AB	AC	AD	AE	AF	AG	AH
1	Name	If you think the SoCal Greenprint will be useful to you or your colleagues, please elaborate on potential use-cases or planning processes that you think the SoCal Greenprint could support?	If you have any concerns about the SoCal Greenprint, please share those concerns.	How would you like to further engage with the development of the SoCal Greenprint? (Select all that apply)				Any additional comments or questions?	
	Steven W Nash			I would like to stay informed about progress and release dates					
27	Susan Skinner			I don't want to be further engaged					
28									

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	Name	Agency	Please choose the theme of the data set you would like to comment on:	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:
1	Terry Welsh, MD	Banning Ranch Conservancy	Context; Environmental Justice, Equity and Inclusion; Habitat and Biodiversity; Vulnerabilities and Resilience; Water Resources	Coastal Habitat Vulnerability; Sea Level Rise	It is important to understand where the vulnerable locations are along the coast. Millions of dollars have been invested in conservation projects there and knowing what needs to be done to offset those vulnerabilities is critical. We are pleased to see that The Nature Conservancy has offered this layer for this tool.; This is an important data layer as those organizations, like ours, are working to create climate resilient projects along the coast that provide for mitigation as the sea levels rise.	Context	Zoning - Orange County; Land Use - Orange County; California Coastal Zone	Similar to our comments on Land Use - Orange County, this layer sets expectations and provides a fact-based view of what may be possible on a property. It is important to have this information easily available.; Understanding land uses as it relates to property is critical to setting expectations and helps project applicants know what is and isn't feasible. This layer is important to include.; The property our organization works to protect sits within the CA Coastal Zone. Having this information early in the planning process will aid decision makers, planners, and developers understand where potential constraints may exist. We support its inclusion.	Environmental Justice, Equity and Inclusion

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1	Terry Welsh, MD	Disadvantaged Communities	Understanding where disadvantaged communities exist and how we can apply that knowledge through planning to reduce inequities is of vital important to our work.	Habitat & Biodiversity	USFWS Threatened & Endangered Species Active Critical Habitat; Conservation Assessment of Orange County; National Wetlands Inventory; Vernal Pools; Important Bird Areas	The property we are working to conserve includes critical habitat for state and federally endangered species. This layer is helpful-- especially to developers-- to understand what agency expectations may be as it relates to on or off site mitigation for the impacts of proposed development.; This overall assessment of conservation opportunities has been a helpful tool related to mitigation completed by the Orange County Transportation Authority. We believe it adds a significant benefit to this project.; All along the Orange County Coast are protected wetlands-- thanks to state agencies and non-profits. This inventory will help plan	Water Resources	Mapped Stream Course	The property we aim to conserve sits at the mouth of the Santa Ana River. There is also a Santa Ana River Conservancy that will be funding acquisition and restoration projects. This layer will aid in both efforts.	

29

**ATTACHMENT D - Proposed Data Layer List Survey Results**

	A	S	T	U	V	W	X	Y	Z
	Name	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please rate your understanding of the SoCalGreenprint:	Do you have any questions or concerns about the goal of the SoCal Greenprint?	The SoCal Greenprint will include:
1	Terry Welsh, MD						3	This goal spans the spectrum of topics and is inclusive of diverse interests.; This Greenprint is a great collaborative effort!; Great goal.; The fact that it has such a wide target audience speaks to the comprehensive nature of the effort. We are glad to see it so thoughtfully approached.; The importance of this tool is that it integrates information in a way that makes it relatable, reliable, and ready for use.; This Greenprint is a great collaborative effort!; This tool links together common topics into one resources-- we like it!; This tool appears to provide certainty for projects as they are assessed through the environmental and planning review processes.; This goal meets what was described in the RTP/SCS EIR/EIS.; This goal aligns with what was written in the Natural and Farmlands Appendix.; Having a one-stop shop of information will serve the greater community. Thank you for taking this on.; The goals recognize the intersection of land use,	The SoCal Greenprint would be useful in my workflow
29									

**ATTACHMENT D - Proposed Data Layer List Survey Results**

	A	AA	AB	AC	AD	AE	AF	AG	AH
1	Name	If you think the SoCal Greenprint will be useful to you or your colleagues, please elaborate on potential use-cases or planning processes that you think the SoCal Greenprint could support?	If you have any concerns about the SoCal Greenprint, please share those concerns.	How would you like to further engage with the development of the SoCal Greenprint? (Select all that apply)				Any additional comments or questions?	
29	Terry Welsh, MD	Yes -- we may create maps or download data related to our conservation work.; Yes, we plan to use the Greenprint to aid in meeting our mission.; We are already working with groups that have Greenprints, but don't have the software/expertise ourselves. We plan to use this tool frequently.; We believe the understanding of regional context for our conservation work will aid the entire effort and bring forward possible conservation opportunities that may not otherwise be aligned right now.; We don't currently have a GIS program, so this tool will make creating maps and understanding layers very beneficial to our work.; This tool will provide us an opportunity comprehensively look at how our area compares to other coastal properties that are already conserved.; We have already used existing tools like Cal EnviroScreen, but having one location to go for all that information will make our work more streamlined.; Yes, this Greenprint will allow us to analyze information related to the property we are working (with willing sellers) to conserve.; Because the property we are	No concerns, we'd just like to see the promise made of getting this done, actually occur.; This tool should be completed this Fall as promised in the 18 month schedule released to the public nearly two years ago.; We are excited to use this tool.; We hope SCAG holds true to its commitment for completing this project.; We'd like to see SCAG honor its commitment to this Greenprint--as promised in the environmental documents and RTP/SCS.	I would like to stay informed about progress and release dates					

**ATTACHMENT D - Proposed Data Layer List Survey Results**

	A	B	C	D	E	F	G	H	I
	Name	Agency	Please choose the theme of the data set you would like to comment on:	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:
1	Tina San	Associate Transportation Planner, Caltrans District 7	Environmental Justice, Equity and Inclusion	Environmental Justice, Equity and Inclusion	CalEnviroScreen Percentile	Although still in draft form, would the data be more accurate referencing the draft CalEnviroScreen 4.0?			

**ATTACHMENT D - Proposed Data Layer List Survey Results**

	A	J	K	L	M	N	O	P	Q	R
1	Name	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:
30	Tina San									

**ATTACHMENT D - Proposed Data Layer List Survey Results**

	A	S	T	U	V	W	X	Y	Z
	Name	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please rate your understanding of the SoCalGreenprint:	Do you have any questions or concerns about the goal of the SoCal Greenprint?	The SoCal Greenprint will include:
1	Tina San						4		The SoCal Greenprint would be useful in my workflow

30

**ATTACHMENT D - Proposed Data Layer List Survey Results**

	A	AA	AB	AC	AD	AE	AF	AG	AH
1	Name	If you think the SoCal Greenprint will be useful to you or your colleagues, please elaborate on potential use-cases or planning processes that you think the SoCal Greenprint could support?	If you have any concerns about the SoCal Greenprint, please share those concerns.	How would you like to further engage with the development of the SoCal Greenprint? (Select all that apply)				Any additional comments or questions?	
30	Tina San	In my work preparing transportation planning scoping information documents for projects, it will be useful to have this data to gain more insight into the context of the area in terms of land use, proximity to disadvantaged communities, and surrounding areas of interest or concern. E.g. being able to quickly see if there are any local county trails or parks that could be linked to a new proposed bikeway would support increased connectivity and accessibility.		I would like to attend a webinar to get a deeper look at what the Greenprint is planned to be and what it will look like	I would like to stay informed about progress and release dates				

**ATTACHMENT D - Proposed Data Layer List Survey Results**

	A	B	C	D	E	F	G	H	I
	Name	Agency	Please choose the theme of the data set you would like to comment on:	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:
1	Walter Lamb	Ballona Wetlands Land Ttrust	Vulnerabilities and Resilience	Sea Level Rise	Sea level rise mapping tools are incredibly important not only for environmental sustainability, but for community planning. This data layer subset will be extremely valuable.				
31									

**ATTACHMENT D - Proposed Data Layer List Survey Results**

	A	J	K	L	M	N	O	P	Q	R
	Name	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:
1	Walter Lamb									
31										

**ATTACHMENT D - Proposed Data Layer List Survey Results**

	A	S	T	U	V	W	X	Y	Z
	Name	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please rate your understanding of the SoCalGreenprint:	Do you have any questions or concerns about the goal of the SoCal Greenprint?	The SoCal Greenprint will include:
1	Walter Lamb						4		The SoCal Greenprint would be useful in my workflow
31									

**ATTACHMENT D - Proposed Data Layer List Survey Results**

	A	AA	AB	AC	AD	AE	AF	AG	AH
1	Name	If you think the SoCal Greenprint will be useful to you or your colleagues, please elaborate on potential use-cases or planning processes that you think the SoCal Greenprint could support?	If you have any concerns about the SoCal Greenprint, please share those concerns.	How would you like to further engage with the development of the SoCal Greenprint? (Select all that apply)				Any additional comments or questions?	
31	Walter Lamb	As an environmental conservation organization, mapping tools that provide regional context for such issues as sea level rise, future habitats, and water resources will be essential.		I would like to stay informed about progress and release dates					

**ATTACHMENT D - Proposed Data Layer List Survey Results**

	A	B	C	D	E	F	G	H	I
	Name	Agency	Please choose the theme of the data set you would like to comment on:	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:
1									
	Yvette Lopez-Ledesma	The Wilderness Society	Environmental Justice, Equity and Inclusion	Park Access - No Park Within Half-mile	My comment is not in relation to the data later itself, it's more to the point that I'd like to commend the SoCal Greenprint team for taking an inclusive approach to addressing the variety of issues illustrated by all of the data. There can not be a planning effort related to the future of this region without centering Environmental Justice, Equity and Inclusion. The issue of park access intersects with all of these issues and the data that was produced by L.A. County Dept. of Parks and Recreation clearly illustrates this. I fully support the Greenprint and hope to see it come to fruition as the helpful tool/resource it is intended to be.				
32									
33			Agriculture and Working Lands Environmental Justice, Equity and Inclusion	Farmland Mapping and Monitoring Program CalEnviroScreen Percentile	Both URL are incorrect  The description states CalEnviroScreen 3.0. Will it be appropriate to use CalEnviroScreen 4.0, although it is still in a draft version?				
34									
35			Agriculture and Working Lands	Farmland Mapping and Monitoring Program	Thank you for including this layer.				

**ATTACHMENT D - Proposed Data Layer List Survey Results**

	A	J	K	L	M	N	O	P	Q	R
	Name	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:
1	Yvette Lopez-Ledesma									
32										
33										
34										
35										

**ATTACHMENT D - Proposed Data Layer List Survey Results**

	A	S	T	U	V	W	X	Y	Z
	Name	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please choose the theme of the data set you would like to comment on:	Please choose the dataset you would like to comment on:	Please provide any comments or feedback you have on this data set.	Please rate your understanding of the SoCalGreenprint:	Do you have any questions or concerns about the goal of the SoCal Greenprint?	The SoCal Greenprint will include:
1	Yvette Lopez-Ledesma						High	I fully support the So Cal Greenprint.	The SoCal Greenprint would be useful in my workflow
32									
33									
34									
35									

**ATTACHMENT D - Proposed Data Layer List Survey Results**

	A	AA	AB	AC	AD	AE	AF	AG	AH
	Name	If you think the SoCal Greenprint will be useful to you or your colleagues, please elaborate on potential use-cases or planning processes that you think the SoCal Greenprint could support?	If you have any concerns about the SoCal Greenprint, please share those concerns.	How would you like to further engage with the development of the SoCal Greenprint? (Select all that apply)				Any additional comments or questions?	
1	Yvette Lopez-Ledesma	We work on a lot of policy and planning as it relates to access to parks and open space in So. Cal and the data in this report is very helpful.		I would like to stay informed about progress and release dates					
32									
33									
34									
35									

Attachment E - Datasets removed prior to posting of Proposed Data Layer List

Dataset	Source Organization	Description	Link	Theme	Reason removed
Multispecies map of probable suitable habitat for rare plants in the California desert (Mojave Desert)	USGS	The multispecies map of probable suitable habitat combines data from all 26 species for which probable suitable habitat was mapped and indicates the number of species for which probable suitable habitat is predicted at each location. Data are presented at a spatial resolution of 10 m pixels, which was required to harmonize the original model inputs. However, maps of suitable habitat should be used at a resolution no smaller than 360 m (i.e., 36 pixels x 36 pixels), which corresponds with the resolution of the coarsest model input. This product can be used to inform future conservation, planning and management actions in the California desert. Complete methods and other additional information are provided in the journal article associated with this data release (Reese and others, 2019).	<a href="https://www.sciencebase.gov/catalog/item/5c994bace40b8a7f6289055">https://www.sciencebase.gov/catalog/item/5c994bace40b8a7f6289055</a>	Habitat and Biodiversity	In the rapid assessment process we heard that modelled data are confusing and difficult to understand. Replaced with ACE III data from CDFW.
Species Distribution Model - amphibians	CDFW	Dataset of current distribution of suitable habitat for amphibian species in California based on species modeling for 153 reptile and amphibian species. This data was created using Maxent (Phillips et al. 2006) to model distribution for each individual species, using information on species occurrences and recent climatic conditions. The modeled habitat was then summed to calculate the number of species with suitable habitat in each 1x1 km cell across the state.	<a href="https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=83972">https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=83972</a>	Habitat and Biodiversity	In the rapid assessment process we heard that species distribution models are confusing and difficult to understand. Replaced with ACE III data from CDFW.
Species Distribution Model - Birds	Point Blue Conservation Science	Dataset of the current distribution of summed suitable habitat for birds in California, based on the suitability index from species distribution modeling for 199 species of birds. This data was created using Maxent (Phillips et al. 2006) to model habitat suitability, relating bird data to vegetation and other environmental layers under recent climate conditions (1971-2000).	<a href="http://climate.calcommons.org/dataset/14">http://climate.calcommons.org/dataset/14</a>	Habitat and Biodiversity	In the rapid assessment process we heard that species distribution models are confusing and difficult to understand. Replaced with ACE III data from CDFW.
Species Distribution Model - Mammals	CDFW	Dataset of the current distribution of summed suitable habitat for mammals in California, based on the suitability index from species distribution modeling for 181 species of mammals. This data was created using Maxent (Phillips et al. 2006) to model suitable habitat for each individual species, combining information on species occurrences, and climate variables with 100km of occurrences. The suitability indices were then summed across species.	<a href="https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=135825&amp;inline">https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=135825&amp;inline</a>	Habitat and Biodiversity	In the rapid assessment process we heard that species distribution models are confusing and difficult to understand. Replaced with ACE III data from CDFW.
Species Distribution Model - plant richness	Kling et al. 2018	Dataset of the current distribution of summed suitable habitat for plants in California, based on the suitability index from species distribution modeling for 5,221 species of plants. This data was created using Maxent modeling (Phillips et al. 2006) to model habitat suitability based on climate variables, but also incorporates distances to species occurrences (which reflects processes like dispersal limitation, edaphic specialization and source-sink dynamics) as well as landscape intactness (Degagne et al. 2016).	<a href="https://royalsocietypublishing.org/doi/full/10.1098/rstb.2017.0397">https://royalsocietypublishing.org/doi/full/10.1098/rstb.2017.0397</a>	Habitat and Biodiversity	In the rapid assessment process we heard that species distribution models are confusing and difficult to understand. Replaced with ACE III data from CDFW.
Species Distribution Model - reptiles	CDFW	Dataset of current distribution of suitable habitat for reptile species in California based on species modeling for 153 reptile and amphibian species. This data was created using Maxent (Phillips et al. 2006) to model distribution for each individual species, using information on species occurrences and recent climatic conditions. The modeled habitat was then summed to calculate the number of species with suitable habitat in each 1x1 km cell across the state.	<a href="https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=83972">https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=83972</a>	Habitat and Biodiversity	In the rapid assessment process we heard that species distribution models are confusing and difficult to understand. Replaced with ACE III data from CDFW.
USFS Tree mortality (aerial surveys)	USFS	Insects and diseases are integral components of forest ecosystems. They play a critical role in shaping forest lands, nutrient recycling, and small-scale disturbance. Disturbances result in changes in the ecosystem function which often means mortality of trees. Tree mortality and other forest damage is detected by annual aerial surveys over forested lands. The primary purpose of the aerial survey is to create sketch maps of areas containing current year conifer and hardwood mortality, defoliation, and other damage. Number of trees and acres with damage are calculated for areas surveyed and reported annually using the methodology described here.	<a href="https://www.fs.usda.gov/detail/r5/forest-grasslandhealth/?cid=fspr6658624">https://www.fs.usda.gov/detail/r5/forest-grasslandhealth/?cid=fspr6658624</a> <a href="https://www.fs.usda.gov/detail/r5/forest-grasslandhealth/?cid=fsbdev3_046696">https://www.fs.usda.gov/detail/r5/forest-grasslandhealth/?cid=fsbdev3_046696</a>	Habitat and Biodiversity	Tree mortality data is only for national forest lands so may be potentially confusing to include and this information is not likely to be of primary importance Greenprint users.
Airport Boundaries	Caltrans, ORIS, Department of Aeronautics	"Airport Boundaries" GIS dataset was created to display California public use airport boundaries that can be viewed by the public.	<a href="https://gisdata-caltrans.opendata.arcgis.com/datasets/a65054baf5345f9884cc83c0dfe88_0/explore?location=37.231250%2C-119.324150%2C6.81">https://gisdata-caltrans.opendata.arcgis.com/datasets/a65054baf5345f9884cc83c0dfe88_0/explore?location=37.231250%2C-119.324150%2C6.81</a>	Built Environment	Buffered airport point locations are included instead of airport boundaries
Precipitation	Northwest Alliance for Computational Science and Engineering - USDA	water that falls into an area + water that flows into an area, relevant for on-site water capture for human or plant use.	<a href="https://prism.oregonstate.edu/recent/">https://prism.oregonstate.edu/recent/</a>	Water Resources	Science advisors who specialize in water resources emphasized that precipitation data is difficult to understand runoff and recharge are more meaningful measures
Important habitat for Threatened & Endangered Vertebrates	Urban Footprint	Data underlying the conservation module of Urban Footprint. This data is compiled from data that support reproduction, cover, and feeding of threatened and endangered vertebrates.	<a href="https://urbanfootprint.com/wp-content/uploads/2019/05/Conservation-Module-Methodology.pdf">https://urbanfootprint.com/wp-content/uploads/2019/05/Conservation-Module-Methodology.pdf</a>	Habitat and Biodiversity	We decided to exclude this dataset because of confusion surrounding communicating these results and it is not publicly available.
Growth Projections	Connect SoCal	Connect SoCal will be adopted at the jurisdictional-level, and directly reflects the population, household and employment growth projections that have been reviewed and refined with feedback from local jurisdictions through SCAG's Bottom-Up Local Input and Envisioning Process. The growth forecast maintains these locally informed projected jurisdictional growth totals, meaning future growth is not reallocated from one local jurisdiction to another.	<a href="https://scag.ca.gov/sites/main/files/file-attachments/0903connectsoocal_demographics-and-growth-forecast.pdf">https://scag.ca.gov/sites/main/files/file-attachments/0903connectsoocal_demographics-and-growth-forecast.pdf</a>	Built Environment	Removed per conversations with the BIA with concerns about local growth.
Faults active in the quaternary	CA Dept of Conservation	The map shows locations of known faults that can be portrayed at 1:750,000 scale and indicates the latest age when displacements took place, according to available data. The displacements may have been associated with earthquakes or may have been the result of gradual creep along the fault surface. The faults are separated into five categories: historic, Holocene, late Quaternary, Quaternary, and pre-Quaternary.	<a href="https://databasin.org/datasets/de61016e429d41099a4bda10cbae86bf/">https://databasin.org/datasets/de61016e429d41099a4bda10cbae86bf/</a>	Climate Vulnerabilities and Resilience	Alquist-Prilo fault zones and liquefaction zones are included in the greenprint instead of this fault map, because of their ties to regulatory procedures
Land Use - Specific Plan	SCAG Open Data Portal	To aid in forecasting land supply and demand for the SCAG region and to be used as a planning tool. To provide GIS users with regional specific plan boundary coverage (November 2018 version).	<a href="https://gisdata-scag.opendata.arcgis.com/datasets/specific-plan-boundary-scag">https://gisdata-scag.opendata.arcgis.com/datasets/specific-plan-boundary-scag</a>	Context	During the rapid assessments users said they did not use this data
RETI 2.0 Proposed Transmission Assessment Focus Areas	CA Energy Commission	Operational, Proposed, and Proxy Renewable Energy Projects location points were clustered at Five, Seven and Ten mile distances. A one mile buffer was applied to the resulting point clusters, to identify project clusters. This data set is intended to identify potential areas of commercial interest.	<a href="https://reti.databasin.org/maps/e3616f361448499bdc724dc655bc0f9/active/">https://reti.databasin.org/maps/e3616f361448499bdc724dc655bc0f9/active/</a>	Built Environment	Superseded by more recent local planning processes

Attachment: ATTACHMENT E - Datasets removed prior to posting of Proposed Data Layer List (SoCal)

Attachment E - Datasets removed prior to posting of Proposed Data Layer List

Geothermal Resource Areas	Bureau of Land Management	Operational, Proposed, and Proxy Renewable Energy Projects location points were clustered at Five, Seven and Ten mile distances. A one mile buffer was applied to the resulting point clusters, to identify project clusters. This data set is intended to identify potential areas of commercial interest.	<a href="https://reti.databasin.org/maps/e3616f36144849a9bdc724dc655bc0f9/active/">https://reti.databasin.org/maps/e3616f36144849a9bdc724dc655bc0f9/active/</a>	Built Environment	Superseded by more recent local planning processes
Transmission Assessment Focus Areas (TAFA) Refinement - Project Clusters	CEC, CPUC, CAISO	Operational, Proposed, and Proxy Renewable Energy Projects location points were clustered at Five, Seven and Ten mile distances. A one mile buffer was applied to the resulting point clusters, to identify project clusters. This data set is intended to identify potential areas of commercial interest.	<a href="https://reti.databasin.org/maps/e3616f36144849a9bdc724dc655bc0f9/active/">https://reti.databasin.org/maps/e3616f36144849a9bdc724dc655bc0f9/active/</a>	Built Environment	Superseded by more recent local planning processes
Inyo SEDA	CA Energy Commission	Zoning data produced by the Planning Dept. This is the 2014 version.	<a href="https://reti.databasin.org/maps/e3616f36144849a9bdc724dc655bc0f9/active/">https://reti.databasin.org/maps/e3616f36144849a9bdc724dc655bc0f9/active/</a>	Built Environment	Removed because it is not part of the SCAG region
Building footprints (LA County)	LA County Planning	LA County Building Footprints	<a href="https://eepj-lacounty.hub.arcgis.com/datasets/bariac4-buildings-2014">https://eepj-lacounty.hub.arcgis.com/datasets/bariac4-buildings-2014</a>	Built Environment	Replaced with statewide building footprint dataset
Coastal Resilience Hubs	NFWF	The primary final product of this Assessment is the Resilience Hubs analysis, which is the result of a landscape suitability assessment guided by the Community Exposure Index and the Fish and Wildlife Index. Resilience Hubs are intended to identify optimal sites for restoration or conservation actions. These include open areas where natural landscapes can be restored or conserved to potentially increase nearby community resilience to flood threats, provide benefit to fish and wildlife, and ensure habitat quality is improved or maintained.	<a href="https://www.nfwf.org/sites/default/files/coastalresilience/Documents/regional-coastal-resilience-assessment.pdf">https://www.nfwf.org/sites/default/files/coastalresilience/Documents/regional-coastal-resilience-assessment.pdf</a>	Vulnerabilities and Resilience	Does not cover the entire SCAG region
Important Plant Areas	CNPS	Important Plant Areas (IPAs) are the places in California which are crucial to the conservation of the State's botanical heritage.	<a href="https://www.cnps.org/conservation/important-plant-areas">https://www.cnps.org/conservation/important-plant-areas</a>	Habitat and Biodiversity	Data will not be available at time of build for the tool
ParkScore	Trust for Public Land	The Trust for Public Land's ParkScore Index is the national gold-standard comparison of park systems across the 100 most populated cities in the United States. Published annually, the index measures park systems according to five categories: access, investment, amenities, acreage, and—new for 2021, equity	<a href="https://www.tpl.org/parkscore">https://www.tpl.org/parkscore</a>	Environmental Justice, Equity, and Inclusion	The index only covers some cities in the SCAG region. We've replaced this with data from the Parks for all Californians tool from CA State Parks
FVEG	CALFIRE-FRAP	An accurate depiction of the spatial distribution of habitat types within California is required for a variety of legislatively-mandated government functions. The California Department of Forestry and Fire Protections CALFIRE Fire and Resource Assessment Program (FRAP), in cooperation with California Department of Fish and Wildlife VegCamp program and extensive use of USDA Forest Service Region 5 Remote Sensing Laboratory (RSL) data, has compiled the "best available" land cover data available for California into a single comprehensive statewide data set. The data span a period from approximately 1990 to 2014. Typically the most current, detailed and consistent data were collected for various regions of the state. Decision rules were developed that controlled which layers were given priority in areas of overlap. Cross-walks were used to compile the various sources into the common classification scheme, the California Wildlife Habitat Relationships (CWHR) system.	<a href="https://map.dfg.ca.gov/metadata/ds1327.html">https://map.dfg.ca.gov/metadata/ds1327.html</a>	Habitat and Biodiversity	Removed as duplicative of NLCD
Orange County community gardens	UC ANR	Orange County community gardens	<a href="http://mgorange.ucanr.edu/General-Gardening/Community_Gardens/Orange_County_Community_Gardens/">http://mgorange.ucanr.edu/General-Gardening/Community_Gardens/Orange_County_Community_Gardens/</a>	Agriculture and Working Lands	Removed as SCAG Civic SPARK Fellows created a comprehensive list of community gardens in the SCAG Region
Urban Agriculture - Los Angeles	Cultivate Los Angeles	Urban agricultural sites in LA County	<a href="https://cultivatelosangeles.org/2013/07/16/mapping-3/">https://cultivatelosangeles.org/2013/07/16/mapping-3/</a>	Agriculture and Working Lands	Removed as SCAG Civic SPARK Fellows created a comprehensive list of community gardens in the SCAG Region
Air Pollution	EPA	Annual concentration at each air quality monitor, metro area, and county (1980-2020) (ozone, pm2.5, pm10, SO2, etc.)	<a href="https://aqs.epa.gov/aqweb/airdata/download_files.html">https://aqs.epa.gov/aqweb/airdata/download_files.html</a> <a href="https://www.epa.gov/outdoor-air-quality-data/air-data-daily-air-quality-tracker-off-report">https://www.epa.gov/outdoor-air-quality-data/air-data-daily-air-quality-tracker-off-report</a>	Environmental Justice, Equity, and Inclusion	SCAG recommended to not include and we instead include CalEnviroScreen Pollution burden as a measure of multiple types of pollution across the SCAG region
PM2.5 aggregate 1998-2016	NASA Socioeconomic Data and Applications Center (SEDAC), Kevin Butler (Esri)	This layer shows particulate matter in the air sized 2.5 micrometers or smaller (PM 2.5) The data is aggregated from NASA Socioeconomic Data and Applications Center (SEDAC) gridded data into state, county, congressional district (116th) and 50 km hex bins. The unit of measurement is micrograms per cubic meter. The data is averaged for each year and over the 19 years to provide an overall picture of air quality in the United States.	<a href="https://www.arcgis.com/home/item.html?id=c6f25019848e4461db70a1b5f05d172fb">https://www.arcgis.com/home/item.html?id=c6f25019848e4461db70a1b5f05d172fb</a>	Environmental Justice, Equity, and Inclusion	Aggregated data was harder to understand. We heard in the rapid assessment that many users are already using the CalEnviroScreen tool and the pollution burden layer captures a more comprehensive understanding of pollution.
South Coast Air Quality data tables (2000-2019)	South Coast AQMD	Historical records of air quality measures for a variety of pollutants in the SCAQMD management area.	<a href="http://www.aqmd.com/home/air-quality/historical-air-quality-data/historical-data-by-year">http://www.aqmd.com/home/air-quality/historical-air-quality-data/historical-data-by-year</a>	Environmental Justice, Equity, and Inclusion	SCAQMD doesn't cover the entire SCAG region (missing Imperial and Ventura County). Used CalEnviroScreen Pollution burden score instead
Libraries	LA County	Locations of libraries in LA County	<a href="https://public.gis.lacounty.gov/public/rest/services/LACounty_Dynamic/LMS_Data_Public/MapServer/90">https://public.gis.lacounty.gov/public/rest/services/LACounty_Dynamic/LMS_Data_Public/MapServer/90</a>	Environmental Justice, Equity, and Inclusion	Only covers LA county and this data is not strongly linked to the goal of the SoCal Greenprint
Native California - museums and cultural centers	Native California	California Indian tribal, health, legal, artistic, cultural, linguistic and media resources	<a href="https://newsfromnativecalifornia.com/resources/">https://newsfromnativecalifornia.com/resources/</a>	Environmental Justice, Equity, and Inclusion	Data is not strongly linked to the goal of the SoCal Greenprint. Team recommends including this in a "resource" section highlighting information unique to the region.
Proximity to grocery stores	SCAG HELPR	By using region-wide data and measuring distances on a street network, SCAG has developed a rudimentary location score for each parcel in the SCAG region. InfoUSA business establishment data (2016) provide the locations of business coded as grocery stores and healthcare provider offices, while the California Protected Areas Database (2017) was used to find open spaces such as parks and beaches. Since open space varies in size, street network data was used to convert this into a rough approximation of "units" of open space, which are equivalent to a city block's worth of open space. This unit is not consistent across the region. This dataset includes the number of grocery stores, healthcare provider offices, and units of open space which can be reached in one mile on the street network from each parcel in the region.  Since accessibility to groceries, healthcare offices, and open space varies greatly across the region, HELPR's documentation indicates the minimum, median, mean, and maximum number of these destinations which can be reached from parcels in each local jurisdiction. For example, demonstrating that a potential site has better than a jurisdiction's average accessibility to groceries may be helpful in demonstrating its suitability. Please note that this analysis has many limitations including the veracity and age of the data and the methodology used and is intended to provide only an illustration of how one might demonstrate accessibility.	<a href="https://maps.scag.ca.gov/help/">https://maps.scag.ca.gov/help/</a>	Environmental Justice, Equity, and Inclusion	Data is not strongly linked to the goal of the SoCal Greenprint and already present in other SCAG tools more focused on development

Attachment E - Datasets removed prior to posting of Proposed Data Layer List

Proximity to healthcare facilities	SCAG HELPR	By using region-wide data and measuring distances on a street network, SCAG has developed a rudimentary location score for each parcel in the SCAG region. InfoUSA business establishment data (2016) provide the locations of business coded as grocery stores and healthcare provider offices, while the California Protected Areas Database (2017) was used to find open spaces such as parks and beaches. Since open space varies in size, street network data was used to convert this into a rough approximation of "units" of open space, which are equivalent to a city block's worth of open space. This unit is not consistent across the region. This dataset includes the number of grocery stores, healthcare provider offices, and units of open space which can be reached in one mile on the street network from each parcel in the region.  Since accessibility to groceries, healthcare offices, and open space varies greatly across the region, HELPR's documentation indicates the minimum, median, mean, and maximum number of these destinations which can be reached from parcels in each local jurisdiction. For example, demonstrating that a potential site has better than a jurisdiction's average accessibility to groceries may be helpful in demonstrating its suitability. Please note that this analysis has many limitations including the veracity and age of the data and the methodology used and is intended to provide only an illustration of how one might demonstrate accessibility.	<a href="https://maps.scag.ca.gov/help/">https://maps.scag.ca.gov/help/</a>	Environmental Justice, Equity, and Inclusion	Data is not strongly linked to the goal of the SoCal Greenprint and already present in other SCAG tools more focused on development
Connect SoCal Constrained Areas	SCAG	There are inherent constraints to expansive regional growth and Connect SoCal recognizes locations that are susceptible to natural hazards and a changing climate. Options have been emphasized that conserve important farmland, resource areas and habitat corridors, while envisioned growth on lands that are vulnerable to wildfire, flooding, and near-term sea-level rise will be decreased. The growth constraints outlined below are used to articulate where future growth is not encouraged. Although these constraints were used for modeling purposes, for implementation the decision of where to permit growth is determined by each local land use authority.	<a href="https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial_sustainable-communities-strategy.pdf?1606002097">https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial_sustainable-communities-strategy.pdf?1606002097</a>		
Outdoor lighting systems (LA city)	City of Los Angeles	This geographic layer shows the location and characteristics of the City of Los Angeles Street Lights. This data is maintained by the Bureau of Street Lighting.	<a href="https://www.arcgis.com/home/item.html?id=c487e5a63d1745f481f8eef3d89731d">https://www.arcgis.com/home/item.html?id=c487e5a63d1745f481f8eef3d89731d</a>	Built Environment	Only covers the city of LA, switched to global light pollution map
Airport noise contours	LA County	Airport Noise Contours - for airports in Los Angeles County.	<a href="https://egis-lacounty.hub.arcgis.com/datasets/airport-noise-contours-1">https://egis-lacounty.hub.arcgis.com/datasets/airport-noise-contours-1</a>	Built Environment	Switched to Bureau of Transportation Statistics Noise map which includes passenger rail, aviation, and road noise
Higher opportunity area	SCAG HELPR	Filters based on 2020 Opportunity Scoring from the 2020 HCD/TCAC opportunity indicators.  In order to further objectives related to Affirmatively Furthering Fair Housing (AFFH), HCD has emphasized access to opportunity as a criteria for siting lower-income housing. A simple yet straightforward analytical approach is to use the HCD/TCAC opportunity scoring measures, which identify census tracts based on a variety of indicators. HELPR has joined these data to individual parcels; this filter identifies parcels based on whether they are in a highest, high, moderate/changing, moderate, low resource, or high segregation/poverty tract.	<a href="https://maps.scag.ca.gov/help/">https://maps.scag.ca.gov/help/</a>	Built Environment	We included the HCD/TCAC opportunity map instead
Broadband access	CA Public Utilities Commission	The CPUC collects data once a year to provide California residents a means to look up information about the broadband services available to them via the California Interactive Broadband Map. The data also provides a first look at area eligibility for California Advanced Services Fund (CASF) applicants. Equally important, the data inform public policies intended to make sure broadband is available throughout California, and to promote digital literacy and broadband usage.	<a href="https://www.broadbandmap.ca.gov/">https://www.broadbandmap.ca.gov/</a>	Built Environment	We heard that this information was not particularly useful to users during the rapid assessment process and it was unclear how they could use this information
Population density by Census Tract	Census/ACS by Tract	Population density	<a href="https://data.census.gov/cedsci/">https://data.census.gov/cedsci/</a>	Environmental Justice, Equity, and Inclusion	It was challenging which demographic information would be useful in a tool like the Greenprint. We instead plan to link out to the Census website and will have reporting by census block so users can look at the full suite of demographic data from the census website.
Highway Climate Vulnerability Assessment	CalTrans	The Caltrans Vulnerability Assessment Statewide Summary Report provides an overview and synthesis of the results of the 12 District Vulnerability Assessment Summary Reports and highlights Caltrans' planned next steps. Advancing these next steps will enable Caltrans to incorporate climate change assessments into project development and integrate such considerations into multiple aspects of agency decisions. These efforts will culminate in a resilient highway network for the State of California.	<a href="https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/office-of-smart-mobility-and-climate-change/caltrans-climate-change-vulnerability-assessment-statewide-summary-feb2021-a11y.pdf">https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/office-of-smart-mobility-and-climate-change/caltrans-climate-change-vulnerability-assessment-statewide-summary-feb2021-a11y.pdf</a>	Built Environment	Removed because we have risks/resilience for climate driven disasters and we have miles of road so you can get a rough estimate of impact
Regional transit projects 2040 line	Connect SoCal	Expected regional transit projects for 2040.	<a href="https://scag.ca.gov/connect-social">https://scag.ca.gov/connect-social</a>	Built Environment	Removed and instead include transit priority areas and high quality transit areas.
Probabilistic Seismic Hazard Assessment	USGS	The 2018 Update of the U.S. National Seismic Hazard Model defines the potential for earthquake ground shaking for various probability levels across the conterminous United States and is applied in seismic provisions of building codes, insurance rate structures, risk assessments, and other public policy. The updated model represents an assessment of the best available science in earthquake hazards and incorporates new findings on earthquake ground shaking, seismicity, and long-period amplification over deep sedimentary basins. The new model represents an update of the seismic hazard model; previous versions were developed in 1996, 2002, 2008, and 2014.	<a href="https://www.usgs.gov/natural-hazards/earthquake-hazards/seismic-hazard-maps-and-site-specific-data">https://www.usgs.gov/natural-hazards/earthquake-hazards/seismic-hazard-maps-and-site-specific-data</a>	Vulnerabilities and Resilience	Replaced with earthquake shaking potential from the CA Geological Survey
Forest structure and fuels (Surface Fuels and Ladder Fuels)	Forest Observatory	Describes forest canopy characteristics and landscape level fuel characteristics to understand their potential contributions to fire.	<a href="https://forestobservatory.com/">https://forestobservatory.com/</a>	Vulnerabilities and Resilience	Removed because we have fire severity maps from CalFire and it requires some interpretation to create a fire risk severity index.
Drinking Water System Area Boundaries	CA Water Board	Intended to assist the public with identifying a public water system (PWS) serving a specified area, a government agency who regulates the water system and other important information related to a PWS.	<a href="https://gispublic.waterboards.ca.gov/portal/apps/webappviewer/index.html?id=272351aa7db14435989647a86e6d3ad8">https://gispublic.waterboards.ca.gov/portal/apps/webappviewer/index.html?id=272351aa7db14435989647a86e6d3ad8</a>	Water Resources	We instead included water districts and drinking water supply watersheds.

Attachment E - Datasets removed prior to posting of Proposed Data Layer List

Forest Carbon	Wilson, Barry Tyler; Woodall, Christopher W.; Griffin, Douglas M. 2013. Forest carbon stocks of the contiguous United States (2000-2009). Newtown Square, PA: U.S. Department of Agriculture, Forest Service, Northern Research Station. <a href="https://doi.org/10.2737/RDS-2013-0004">https://doi.org/10.2737/RDS-2013-0004</a>	Through application of a nearest-neighbor imputation approach, mapped estimates of forest carbon density were developed for the contiguous United States using the annual forest inventory conducted by the USDA Forest Service Forest Inventory and Analysis (FIA) program, MODIS satellite imagery, and ancillary geospatial datasets. This data was processed to include live tree aboveground forest carbon, live tree belowground forest carbon, forest down dead carbon, forest litter carbon, forest standing dead carbon, and forest understorey carbon. (Per hectare estimate of total forest carbon for a pixel, units Megagrams)	<a href="https://apps.fs.usda.gov/fseis01/rest/services/BDW_ForestEcology/FIA_AboveGroundForestCarbon/ImageServer">https://apps.fs.usda.gov/fseis01/rest/services/BDW_ForestEcology/FIA_AboveGroundForestCarbon/ImageServer</a>	Habitat and Biodiversity	We already include a carbon layer from the California Air Resources Board
100-year floodplain	Fathom	The 500 year flood zone is a designated area with a 1 in 100, or 1-percent, chance of a flood at that level occurring in any given year	<a href="https://www.fathom.global/fathom-us">https://www.fathom.global/fathom-us</a>	Vulnerabilities and Resilience	Replaced with FEMA flood maps because we heard in the rapid assessment process that the FEMA maps are the preferred maps for CEQA evaluation
500-year floodplain	Fathom	The 500 year flood zone is a designated area that has a 1 in 500 (0.2%) chance of being met or exceeded in any given year	<a href="https://www.fathom.global/fathom-us">https://www.fathom.global/fathom-us</a>	Vulnerabilities and Resilience	Replaced with FEMA flood maps because we heard in the rapid assessment process that the FEMA maps are the preferred maps for CEQA evaluation
Job centers	SCAG HELPR	Connect SoCal, SCAG's 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), prioritizes growth in areas including job centers, neighborhood mobility areas, and high-quality transit areas (2045) based on their ability to support sustainable transportation. Connect SoCal also de-emphasizes growth constraint areas based on environmental factors—these were broken into absolute constraints and variable constraints based on severity. See the Connect SoCal Sustainable Communities Strategy Technical Report for details; also note that the decision of where to permit growth is determined by local land use authorities and not SCAG.	<a href="https://maps.scag.ca.gov/help/">https://maps.scag.ca.gov/help/</a>	Environmental Justice, Equity, and Inclusion	Included in priority growth areas
Neighborhood mobility areas	SCAG HELPR	Connect SoCal, SCAG's 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), prioritizes growth in areas including job centers, neighborhood mobility areas, and high-quality transit areas (2045) based on their ability to support sustainable transportation. Connect SoCal also de-emphasizes growth constraint areas based on environmental factors—these were broken into absolute constraints and variable constraints based on severity. See the Connect SoCal Sustainable Communities Strategy Technical Report for details; also note that the decision of where to permit growth is determined by local land use authorities and not SCAG.	<a href="https://maps.scag.ca.gov/help/">https://maps.scag.ca.gov/help/</a>	Environmental Justice, Equity, and Inclusion	Included in priority growth areas
Farmland Under Threat	American Farmland Trust	Farms Under Threat is American Farmland Trust's multi-year effort to document the extent, diversity, location, and quality of agricultural land in the continental U.S.—as well as the threats to this land from expanding commercial, industrial, and residential development.	<a href="https://csp-fut.appspot.com/">https://csp-fut.appspot.com/</a>	Agriculture and Working Lands	Only shows areas that have been converted, the CA FMPMP data captures the agricultural data in the state better.
Native Lands	Native Land Digital	A global map of native and indigenous territories	<a href="https://native-land.ca/">https://native-land.ca/</a>	Environmental Justice, Equity, and Inclusion	Stakeholders we talked to recommended using the CA Native American Heritage Commission's Digital Atlas instead.
Tribal Land	US Census 2019	Tribal Land Boundaries	<a href="https://www2.census.gov/geo/tiger/TIGER2019/AIANNH/">https://www2.census.gov/geo/tiger/TIGER2019/AIANNH/</a>	Environmental Justice, Equity, and Inclusion	Stakeholders we talked to recommended using the CA Native American Heritage Commission's Digital Atlas instead.
Tribal Land	PAD-US 2020	Tribal Land Boundaries	<a href="https://www.sciencebase.gov/catalog/item/5f186a2082cef313ed843257">https://www.sciencebase.gov/catalog/item/5f186a2082cef313ed843257</a>	Environmental Justice, Equity, and Inclusion	Stakeholders we talked to recommended using the CA Native American Heritage Commission's Digital Atlas instead.
Wildlife Road Kills - hotspots	data source (Waeijen and Shilling, 2017) and hotspot analysis (Shilling and Waeijen, 2015).	These data include large mammal WVC for 2009 to 2018, but do not include all WVC, just those reported to CHP or by the "public", which for us is mostly agency biologists.	<a href="https://roadeology.ucdavis.edu/hotspots/map">https://roadeology.ucdavis.edu/hotspots/map</a>	Habitat and Biodiversity	Not directly tied to the goals of the Greenprint

Attachment: ATTACHMENT E - Datasets removed prior to posting of Proposed Data Layer List (SoCal)



# MEMORANDUM

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**TO:** Jason Greenspan,  
Manager, Sustainable and Resilient Development  
*Southern California Association of Governments (“SCAG”)*

**FROM:** Margaret M. Sohagi, Esq.

**SUBJECT:** SoCal Greenprint

**DATE:** September 30, 2021

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## I. PURPOSE OF MEMORANDUM

Certain stakeholders assert the SoCal Greenprint (“Greenprint”) tool could be used to challenge a project’s compliance with the California Environmental Quality Act (Pub. Resources Code, § 21000 et seq., hereafter, “CEQA”; Title 14 Cal. Code Regs., § 15000 et seq., hereafter “CEQA Guidelines”). SCAG has asked if the Greenprint *by itself* is evidence of “significant” or “substantial” new information triggering recirculation or subsequent environmental review under CEQA.

## II. CONCLUSION

The Greenprint tool, once fully developed, will allow users to create maps and reports using existing data and information. As such, the Greenprint does not disrupt the traditional CEQA process in any way, nor does it interfere with a public agency’s exercise of discretion when evaluating projects under CEQA. Specifically, the Greenprint is not, by itself, evidence of new information that would trigger additional CEQA review. And while nothing can prevent project opponents from filing a CEQA lawsuit, the Greenprint by itself does not increase their chances of succeeding in court.

## III. PROJECT BACKGROUND

The Greenprint is a part of SCAG’s larger Geographic Information Services (“GIS”) program, which was initiated in the 1980’s to provide information to all

stakeholders in the Southern California region<sup>1</sup>. The Greenprint is an online regional mapping tool that, when fully developed and operational, will provide public access to multiple data layers that already exist and are available to the public<sup>2</sup>. Specifically, “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 is not a ‘plan,’ nor is it intended to produce any new data; rather it will aggregate data from existing public sources to support local jurisdictions, transportation agencies, developers, non-profits and other stakeholders...” (<https://scag.ca.gov/pod/socal-greenprint-proposed-data-layer-list>). For example, the Greenprint includes frequently used databases such as the California Natural Diversity Database ("CNDDDB") published by California Fish and Wildlife Service, the Fire Hazard Severity Zones Maps published by Cal Fire, coastal zone boundaries mapped by the California Coastal Commission and data already published via SCAG’s open portal. The Greenprint does not modify the data that is available as part of the tool.

#### **IV. THE GREENPRINT DOES NOT CONSTRAIN PUBLIC AGENCY DISCRETION UNDER CEQA**

A key step in the CEQA process is to identify whether a proposed project has a significant effect on the environment, meaning a substantial, or potentially substantial, adverse change in the environment. (Pub. Resources Code, §§ 21002.1(a) and 21068; CEQA Guidelines, §§ 15002, and 15382(b).) Determining whether an impact is significant requires more than the mere presentment of data. Rather, it requires discretion on the part of the public agency that reviews the project. “The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the public agency involved, based to the extent possible on scientific and factual data. An ironclad definition of significant effect is not always possible because the significance of an activity may vary with the setting. For example, an activity which may not be significant in an urban area may be may significant in a rural area.” (CEQA Guidelines, § 15064(b)(1); *Jensen v. City of Santa Rosa* (2018) 23 Cal.App.5th 877, 887.) A critical step for this analysis involves applying “thresholds of significance” to determine significant environmental effects. (CEQA Guidelines, § 15064.7(b)(2);

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<sup>1</sup> The Greenprint also implements Connect SoCal, its certified Program Environmental Impact Report and Addendum, including mitigation measures SMM AG-2 and SMM Bio-2.

<sup>2</sup> This memorandum’s conclusions are premised on the understanding, as represented in the staff report, that all data sets in the Greenprint tool are existing and publicly available. Public availability is not precluded merely because a data source may require a user to acknowledge license restrictions, or may require certain software to retrieve data.

*Mission Bay Alliance v. Office of Community Investment & Infrastructure* (2016) 6 Cal.App.5th 160, 192 [“The lead agency has substantial discretion in determining the appropriate threshold of significance to evaluate the severity of a particular impact.”].)

Therefore, as an initial matter, while data is needed for CEQA analysis, it is important to note that data, by itself, is not an “analysis.” And the Greenprint, a stand-alone tool that provides users the ability to map data layers from sources that are available to the public, does not impinge on a jurisdiction’s discretion to analyze projects under CEQA, nor does the Greenprint modify a jurisdiction’s CEQA review process. (See CEQA Guidelines, § 15121(b) [stating that “information in the EIR does not control the agency’s ultimate discretion on the project” and noting that the lead agency has discretion to “decide whether or how to approve or carry out the project.”].)

**V. THE GREENPRINT IS NOT EVIDENCE OF "SIGNIFICANT NEW INFORMATION" TRIGGERING RECIRCULATION OF A CEQA DOCUMENT**

Some stakeholders suggest project opponents may inundate a project record with information containing multiple data layers from the Greenprint prior to project approval, resulting in an agency’s need to counter such information with substantial evidence. They further suggest that, in turn, this will lead to recirculation of the CEQA document, project delays and greater litigation exposure. Stakeholders asserting this position point to an urgent need for local jurisdictions to approve housing elements and housing projects as prime examples of projects that could be constrained.

Concerns about delays and an enhanced risk of litigation are unfounded. Any data proffered by project opponents already exists outside of the Greenprint and can readily be submitted into the project record prior to project approval – regardless of whether the Greenprint is developed. Nothing about the Greenprint modifies CEQA protocols; agencies will proceed with their standard practice of reviewing the evidence submitted within the agency’s established timeframes and respond as appropriate. Similarly, the longstanding test triggering recirculation of a CEQA document has not changed. The California Supreme Court has made clear that recirculation is intended to be the *exception*, not the rule. (*Laurel Heights Improvement Assn. v. Regents of University of California* (1993) 6 Cal.4th 1112, 1130; see also *Environmental Council of Sacramento v. City of Sacramento* (2020) 45 Cal.App.5th 1020, 1034 [recirculation was not required when the EIR adequately discussed greenhouse gas impacts and petitioners did not meet their burden of showing that the EIR underestimated traffic impact.].) CEQA only requires recirculation in specific situations such as when, for example:

1. A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented;
2. A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance;
3. A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it;
4. The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded. (*Mountain Lion Coalition v. Fish and Game Com.* (1989) 214 Cal.App.3d 1043) ...

(b) Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.

(Pub. Resources Code, § 21092.1; CEQA Guidelines, §§ 15088.5(a), (b).)

Nothing about the Greenprint, or the data layers that will be available to users as part of the Greenprint, increases the legal necessity to recirculate CEQA documents under this test because the data already exists and is available.

Contrary to the assertions from some stakeholders, an articulated purpose of the Greenprint is to assist in *expediting* the CEQA compliance process by providing a tool that is readily available at the outset of the CEQA process. All stakeholders, including environmental consultants tasked with document preparation for public agencies and project applicants, can avail themselves of the data early-on. "Late hit" comments and "data drops" become even more inexcusable. (See *Citizens for Responsible Equitable Environmental Development v. City of San Diego* (2011) 196 Cal.App.4th 515, 530 [finding that petitioner failed to "fairly present information" to City council when petitioner submitted a DVD containing thousands of pages of documents and data to City clerk on the day of the noticed public hearing, and thus failed to satisfy the exhaustion doctrine.]) And while nothing prevents project opponents from filing a CEQA lawsuit, nothing about the Greenprint tool itself creates or unleashes viable, new claims.

**VI. THE GREENPRINT IS NOT EVIDENCE OF “SUBSTANTIAL NEW INFORMATION” TRIGGERING SUPPLEMENTAL REVIEW**

Some stakeholders also express concern that once a project, such as a specific plan, is approved in compliance with CEQA, parties may use the Greenprint tool to trigger additional environmental review for later implementing actions, such as tentative maps or use permits. Not so. CEQA includes a strong presumption against requiring additional environmental review after a CEQA document has been approved. This presumption was adopted to implement the legislative policy favoring prompt resolution of challenges to the decisions of public agencies regarding land use. (*Citizens for a Megaplex-Free Alameda v. City of Alameda* (2007) 149 Cal.App.4th 91, 111.) In fact, public agencies are *prohibited* from conducting supplemental review unless one of these narrow exceptions apply:

1. Substantial changes in the project are proposed;
2. Substantial changes occur in circumstances with respect to the circumstances under which the project is undertaken that will require major revisions in the EIR or Negative Declaration;
3. New information of substantial importance to the project that was not known and could not have been know when the EIR or Negative Declaration is adopted becomes available and shows any of the following:
  - (A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
  - (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;
  - (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative;
  - (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

(Pub. Resources Code, § 21166; CEQA Guidelines, § 15162(a).)

Most relevant here is whether the Greenprint qualifies as “significant new information” under number 3 above. The answer is “No.” The “new information” trigger requires, among other things, that the information “could not have been known.” The Greenprint simply permits existing data to be viewed on maps or in reports, and the existing data is already available to the public. Thus, the data is already known. Most relevant is *Citizens for a Responsible Equitable Environmental Development v. City of San Diego, supra*, 196 Cal.App.4th at 531, in which the court held an agency’s determination that impacts relating to global warming caused by greenhouse gas emissions were not “new information” because that information had been available at the time the EIR was certified. (See also *A Local & Reg’l Monitor (ALARM) v. City of Los Angeles* (1993) 12 Cal.App.4th 1773, 1802 [letter in question merely quantified a conclusion implicit in the original traffic study].)

Furthermore, even without the benefit of the statutory presumption against supplemental environmental review, courts regularly conclude that new technical information is not grounds for recirculation or additional analysis. For example, in *Planning and Conservation League v. Castaic Lake Water Agency* (2009) 180 Cal.App.4th 210, appellants contended the EIR improperly relied upon an outmoded hydrological model. The court concluded that the updated model did not need to be utilized in the EIR. Similarly, in *Bay Area Citizens v. Association of Bay Area Governments* (2016) 248 Cal.App.4th 966, 1017, the court concluded that new regulatory requirements under the Pavley II standards did not need to be utilized in the Draft EIR, as it would not have been feasible because they were released four months prior to the EIR’s release. (See also *Santa Clarita Organization for Planning the Environment v. County of Los Angeles* (2007) 157 Cal.App.4th 149, 161.) Significantly, unlike the cited cases, the proposed Greenprint is not a new model or new data, it simply allows users to create maps and reports with existing information.

At bottom, well-established CEQA law disfavors additional environmental review after a project has been approved. The Greenprint by itself does not trigger the narrow exceptions to this rule.

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Attachment: ATTACHMENT F - Correspondence from Margaret Sohagi, Esq regarding CEQA (SoCal Greenprint Update)

## Attachment G

### SoCal Greenprint Outreach, Data Vetting Process, Use, and Documentation

This document describes (1) stakeholders involved that informed the initial selection of data layers for the SoCal Greenprint; (2) how proposed data layers in the SoCal Greenprint were selected; (3) how the data elements would be utilized in the tool and displayed; and (4) how data elements will be documented within the SoCal Greenprint website.

#### 1) SoCal Greenprint Outreach

The planning process for the SoCal Greenprint was launched in 2019 and has included input from a diverse group of stakeholders in the fields of planning, land development, transportation, infrastructure, conservation, and community organization. The project's first year entailed extensive, targeted outreach to stakeholders to gain insight on the tool's potential key users, uses, main themes, and the most useful datasets to include. More than 60 organizations, representing every county in the SCAG region, have participated in the development process.

SCAG and The Nature Conservancy (TNC) have also assembled an advisory Steering Committee to provide SCAG staff with ongoing guidance on the development of the tool. Steering Committee members attend monthly meetings with SCAG, TNC, and GreenInfo Network (GIN) to provide feedback and assist with outreach and identifying key contacts. Steering Committee participants have included representatives from Audubon California, East Yard Communities for Environmental Justice, Friends of Harbors Beaches and Parks, Nature for All, Tataviam Land Conservancy, and UCLA Institute of the Environment and Sustainability, among others.

TNC and SCAG also assembled a Strategic Advisory Committee and a Science and Methods Advisory Committee that include experts and external stakeholders from the building industry, local governments, infrastructure and natural resource agencies, conservation organizations, community organizations, landowners, parks and open space districts, scientists, and academia. Committees were assembled to reflect the diversity of people, landscapes, and experiences within the SCAG region to help the tool be meaningful for key users. Committee participants are asked to contribute actively in meetings and provide feedback to SCAG and the TNC team at key inflection points throughout the data gathering, development, and refinement process.

Strategic Advisory Committee Membership:

First Name	Last Name	Organization
Francis	Appiah	Caltrans
Merrill	Berge	Climate First: Replacing Oil and Gas
Jessica	Cervantes	From Lot to Spot
Danielle	Dolan	Local Government Commission
Amanda	Fagan	Ventura County Transportation Commission
Jennifer	Ganata	Communities for a Better Environment
Kara	Heckert	American Farmland Trust
Andrew	Henderson	The Henderson Law Firm
Lesley	Hill	Orange County Transportation Authority

Thuy	Hua	Los Angeles County Department of Regional Planning
Natasha	Keefer	Clean Power Alliance of Southern California
Tanvi	Lal	ICF
Josh	Lee	San Bernardino County Transportation Authority
Yvette	Lopez-Ledesma	The Wilderness Society
Luis	Olmedo	Comite Civico Del Valle, Inc.
Monica	Palmeira	California Public Utilities Commission
Silvia	Paz	Alianza
Daniel	Peeden	Assemblymember Gomez Reyes
Paolo	Perrone	Trust for Public Land
Tracy	Quinn	Metropolitan Water District & Natural Resources Defense Council
Brittany	Rivas	LAANE
Carlos	Rodriguez	BIA Baldy View Chapter
Ali	Sahabi	Optimum Group LLC
Karen	Schmidt	Ventura County Resident
Emily	Tibbott	Strategic Growth Council
Marybeth	Vergara-Garcia	Rivers and Mountains Conservancy
Adam	Wood	Building Industry Association of Southern California - Orange County Chapter
Cameron	Yee	CAUSE
Lucas	Zucker	CAUSE

Science and Methods Advisory Committee Membership:

First Name	Last Name	Organization
Katie	Barrows	Coachella Valley Association of Governments
Derek	Booth	University of California, Santa Barbara
Jon	Christensen	University of California, Los Angeles
Frank	Davis	University of California, Santa Barbara
Sabrina L.	Drill	University of California, Cooperative Extension, Los Angeles
Melodie	Grubbs	University of Southern California, Sea Grant Program
Rick	Halsey	Chaparral Institute
Megan	Jennings	San Diego State University
Travis	Longcore	UCLA/LandIQ
Chris	McDonald	UC Cooperative Extension, San Bernardino County
Beatriz	Nobua-Behrmann	UC Cooperative Extension, Los Angeles & Orange County
Miguel	Ordenana	Los Angeles County Natural History Museum
Diana	Ruiz	Riverside-Corona Resource Conservation District
Matt	Shapero	UC Cooperative Extension, Ventura County/Santa Barbara County
Eric	Stein	Southern California Coastal Water Resource Project
Eric	Wood	California State University, Los Angeles
Tiffany	Yap	Center for Biological Diversity
Sam	Young	California Native Plant Society

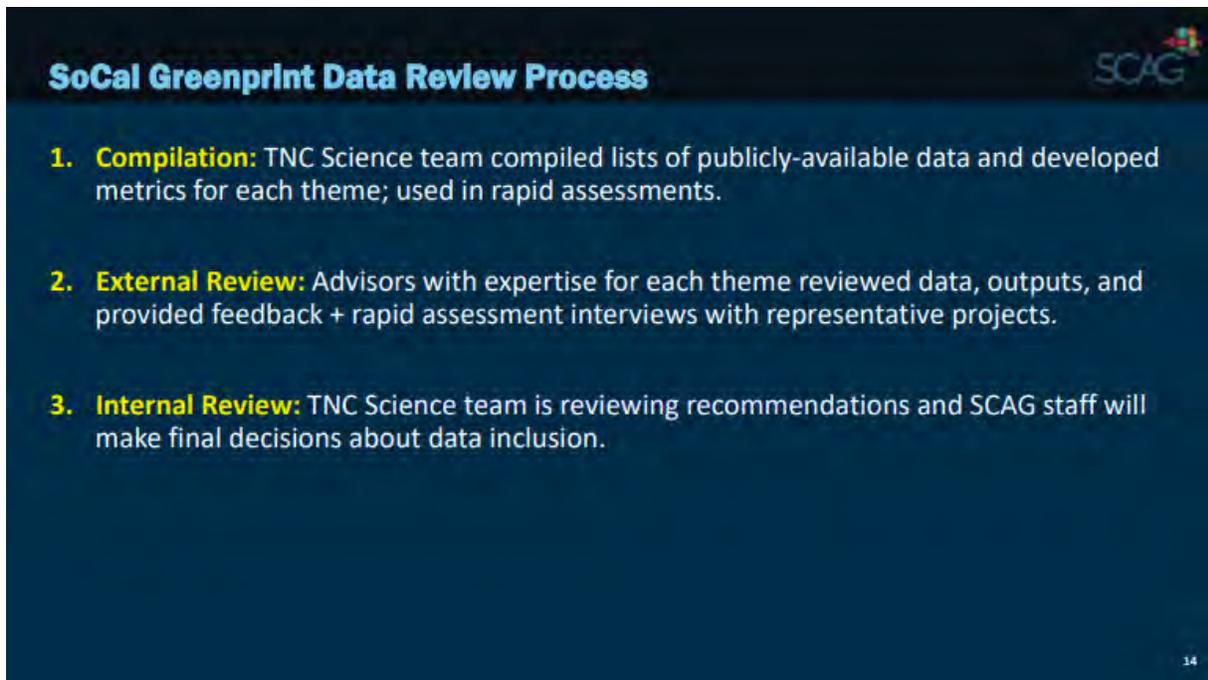
This includes:

- Connecting with regional stakeholders who should be engaged or might provide additional expertise;
- Providing input on themes and data outputs, and identifying sources of data;
- Providing feedback on data communication and interpretation; and
- Supporting developing case studies and participating in beta testing of the Greenprint tool.

An important element of the project entails interviews with key stakeholders, including members of the building and development community. “Rapid Assessment” sessions have been conducted with various organizations to identify their priorities and walk individual stakeholders through potential data outputs for inclusion in the Greenprint. These sessions have been held with representatives of the Building Industry Association of Southern California (BIASC), Los Angeles County Planning Department, Riverside Corona Resource Conservation District, Sierra Club, Clean Power Alliance, and San Bernardino County Transportation Authority (SBCTA). Additional invitations for Rapid Assessment sessions were extended to local jurisdictions, county transportation commissions, subregions, community-based organizations, and local conservancies.

## 2) SoCal Greenprint Data Vetting Process

The SoCal Greenprint utilizes an established data vetting process that builds on stakeholder feedback, and is reflected in the [slides shared with Regional Council](#) at the July 1<sup>st</sup> meeting (slide 14):



### Data Compilation:

- Since the SoCal Greenprint launched in January 2020, SCAG and The Nature Conservancy (TNC) have done active outreach to understand what datasets are available across the SCAG region.

Through multiple meetings with individual scientists (agency, academic, and non-profit) as well as outreach to a wide array of stakeholders, the team has solicited advice on datasets to include.

- Following the first advisors meeting in May 2020, SCAG and TNC solicited feedback via a survey asking for recommendations of datasets and planning tools to integrate into the SoCal Greenprint. The team tracked all data recommendations from advisors and reviewed statewide and SCAG datasets related to the themes guiding the organization of the Greenprint. After the second advisory committee meeting in December 2020, we again solicited advisors for feedback and recommendations for data to guide the development of the Greenprint.

#### External Review:

- SCAG and TNC then included recommended and public agency datasets to support the Rapid Assessment process in early 2021. Rapid Assessments are a dedicated session for specific stakeholders to understand data elements useful for their work, and how the SoCal Greenprint could best support decision-making in the conservation space. Based on feedback from Rapid Assessment partners (including representatives from the Building Industry Association), the team further refined which datasets to include and added additional datasets.
- From there, we solicited feedback from over 30 scientists and stakeholders across the SCAG region in an open review period, and hosted a dedicated workshop where participants were given an in-depth overview of the data and technical aspects of the tool and had an extended question and answer period with SCAG and TNC Staff.
- The six data themes for the project were created based stakeholder feedback, taking into account the data that was recommended, and were subsequently vetted with project advisors. These themes are Agriculture & Working Lands, Biodiversity & Habitat, Built Environment, Environmental Justice, Equity and Inclusion, Vulnerabilities and Ecological Resilience, and Water Resources. Most proposed data layers fall distinctly in one theme. For layers that could fall within more than one area, stakeholder feedback helped to identify what data elements should be associated with each theme.
- In general, datasets that covered the entire region, were already existing, publicly available, and supported the goals of the Greenprint were included. Where datasets were redundant, the team chose the dataset that stakeholders cited as using most frequently or most important to their work. When data was found to be incomplete, potentially biased, or outside the scope of the Greenprint, it was removed.
- For datasets that are reflective of policy decisions from a government authority (e.g. general plan land use, high quality transit areas, etc.), these data elements are included if they are reflective of existing or planned outcomes and are relevant to inform future development projects. Parcel-based general plan land use, for instance, is a data-driven manifestation of policies in a general plan. Since the prescribed and allowable use for each parcel is distinct, enforceable, and represent a concrete data element, this information is relevant to the tool since land use restrictions are extremely important for informing future development projects.

#### Internal Review:

- Finally, the SoCal Greenprint Steering Committee, Science Committee, and Advisory Committee will be reviewing recommendations, and SCAG staff will make final decisions about data inclusion.

### 3) Use of Data in the SoCal Greenprint Tool

Each dataset will be used in the same way on the SoCal Greenprint platform, which will allow users to view data by one of several methods. As shared with Regional Council on July 1 ([refer to slide 16](#)), these methods include: (1) interactive web maps with individual layers for viewing, (2) multi-benefit asset maps that combine data layers by theme, and (3) customized reporting that explain data outputs for a user-generated area:

**Greenprint Data Visualizations & Tools**

**Interactive Web Map**

- Displays local, state, and federal datasets
- Users can turn-on or turn-off layers
- Data layers will be downloadable

**Multi-Benefit Asset Maps**

- Combines data layers from the Web Map based on central themes
- Transparencies allow users to customize how data is shown
- For visualization purposes only, and not downloadable

**Customized Reporting**

- Users can draw a boundary and create a report summarizing data outputs
- Users can compare outputs for two different areas
- Reports & data layers will be available for download

16

1. An interactive **webmap function will allow users to view any individual data layer on its own, or a combination of layers**. The map allows users to turn on and turn off layers and adjust transparencies so that data is presented in a customizable and easy to use fashion. Layers will be shown in their native versions, and will not be altered. The fashion in which attributes from layers will be depicted is informed by the science advisors and other project stakeholders. For additional details on what information from each data element will be depicted, please refer to the descriptions included on the [SoCal Greenprint Proposed Data Layer List](#).
2. **Multi-benefit asset maps** combine data layers along a common theme (Agriculture & Working Lands, Biodiversity & Habitat, Built Environment, Environmental Justice, Equity and Inclusion, Vulnerabilities and Ecological Resilience, and Water Resources), and are used for visualization purposes. The application of this data is flexible and priorities are user driven, as users can toggle transparencies to see how benefits within that data theme vary by area based on what's important to them. This enables users to view data based on their unique needs and perspectives.
3. Users can access customized **summary reports** for an area by drawing boundaries in the application or adding a shapefile with boundaries. The tool will **generate reports summarizing underlying data elements** in the area, and users can compare two areas side-by-side if desired. Reports and the underlying data will be available for download.

#### 4) Documentation of Data & Use Limitations in the SoCal Greenprint Tool

Consistent with SCAG's past and current practice, all data layers included in the SoCal Greenprint will feature individual background information on methods, limitations, sourcing, as well as guidance on their proper use, including:

- A narrative glossary definition explaining what the measure is in user-friendly terms;
- A description of the methodology used to include the data. If any more complex formulas were used, those will be detailed;
- Names, URLs, and last-updated date for data source(s). Usually a single source, but in rare instances one measure might draw on two data sources. In all cases, URLs will link back to the original source of the data; and
- Minimum reporting size. Where data is accurate at larger areas but not smaller, we will display the minimum reporting size alongside the glossary entry. (Note that this reporting threshold will be used in the tool to hide reporting for measures that are not precise enough for a given area of interest report).

Further, layers will be combined in a single database for external use through an Automated Programming Interface (API), and the database will include metadata consistent with the Geospatial Metadata Standards and Guidelines established by the Federal Geographic Data Committee (FGDC), as such:

- Identification Information (originator, publication date, title, abstract, purpose, time period for content, currentness, progress, maintenance, etc.);
- Data Quality Information (attribute accuracy, completeness, positional accuracy, etc.);
- Spatial Data Organization Information (indirect spatial reference for locating data without using coordinates);
- Spatial Reference Information (geographic coordinate system, latitude and longitude, etc.);
- Entity and Attribute Information (detailed description of dataset, overview description, attribute domain values, etc.);
- Distribution Information (contact information for the individual or organization that distributes the data, a statement of liability assumed by the distributing individual or organization); and,
- Metadata Reference Information (date metadata was written, contact information for the metadata author, metadata standard, metadata access constraints, metadata use constraints).

# Greenprint Public Hearing

**October 7, 2021**

**12:30 PM**

[www.scag.ca.gov](http://www.scag.ca.gov)



## Agenda

**Welcome, Introduction and Open the Public Hearing**  
Hon. Clint Lorimore, SCAG President

**Public Comment**

**Greenprint Overview Presentation**  
Jason Greenspan, Manager, Sustainable and Resilient Development

**Questions from the Regional Council**

**Close Public Hearing**

**Regional Council Discussion and Potential Action**

## **Welcome and Introduction**

## **Open Public Hearing for Public Comment Period**

## Verbal Public Comment Instructions

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- Please unmute yourself when directed.
- Limit oral comments to **2 minutes**, or as otherwise directed by staff. A 30 second warning will be provided.
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- Please use the chat box for any technical concerns or issues.

Attachment: PowerPoint Presentation - SoCal Greenprint Hearing (SoCal Greenprint Update)

# SoCal Greenprint Public Hearing

Overview Presentation

October 7<sup>th</sup>, 2021

Jason Greenspan  
Manager, Sustainable and Resilient Development Department

[www.scag.ca.gov](http://www.scag.ca.gov)



## What is a Greenprint?

A tool to help users make better land use and transportation infrastructure decisions and support conservation investments based on the best available scientific data.



## Implementation Pause & Subsequent Activities

On July 1st, 2021 the Regional Council voted to pause implementation on the SoCal Greenprint for at least 30 days and to hold a public hearing for further discussion, permitting staff to engage in further outreach with stakeholders.

### Outreach since Pause Implementation:

- Proposed Data List & Survey
- August 24<sup>th</sup> Public Hearing
- Presentations to TWG and GLUE Council
- One-on-One Stakeholder meetings

## Goals of the SoCal Greenprint



- Implement Connect SoCal
- Balance growth with conservation
- Accommodate infrastructure while protecting natural resources
- Address the lack of consistent, regional data and tools
- Better prioritize lands for mitigation investments
- Resource for our member agencies and stakeholders

## The SoCal Greenprint will



- Aggregate existing data in an interactive online format



- Help decision makers plan for development with nature in mind



- Encourage and highlight conservation efforts that provide multiple benefits for nature and people



- Function as open resource for conservation information that anyone can access

## Key Users of the SoCal Greenprint



Infrastructure Agencies



Conservation Practitioners



Community-Based Organizations



Developers



Planners  
(Town, City, County, Tribal)

## Regional Policy: Connect SoCal

### Connect SoCal – Core Vision

- Maintain and better manage the transportation network
- Expand mobility choices & locate housing/jobs/transit closer together
- Increase investment in transit and complete streets

### Regional Goals

- Promote conservation of natural and agricultural lands & restoration of habitats
- Balance with regional housing production
- Natural & Farm Lands Conservation Technical Report

### Climate Emergency (Resolution 21-628-1)

- Regional Council adopted January 2021
- Greenprint tool to highlight the benefits of natural lands, water and agricultural lands

## Regional Policy: Sustainable Communities Strategies

### Sustainable Communities Strategies

- Climate adaptation, hazard mitigation, & community resiliency support
- Renewable energy production, urban heat island, and carbon sequestration support
- Local food production
- Resource efficient development
- Regional wildlife connectivity
- Reduce consumption of resource areas, including agricultural land
- Public park space access



## Connect SoCal PEIR

### Mitigation Measures

- **SMM AG-2:** “SCAG shall use the Greenprint to identify priority conservation areas in support of advanced mitigation efforts in the region”
- **SMM BIO-2:** “New regional tools like the Greenprint will provide an easily accessible resource to help municipalities, conservation groups, developers and researchers prioritize lands for conservation based on the best available scientific data”

Lead agencies may use, amend, or not use measures identified in the PEIR as appropriate to address project-specific conditions. The determination of significance and identification of appropriate mitigation is solely the responsibility of the lead agency.

## What is a Greenprint?

- A **data tool** that can help to advance the pace and scale of voluntary conservation in a region.
- A **data tool** that identifies landscape features that are important to residents and communities, like recreation, habitat, water resources, habitat, climate change resiliency or community.
- A **data tool** that illustrates how conservation values may work in concert with each other and with other values, like climate resilience.
- A **resource** that helps stakeholders understand factors in a specific area to help facilitate collaboration.
- An **information tool** to support data-driven decision making for infrastructure investments.

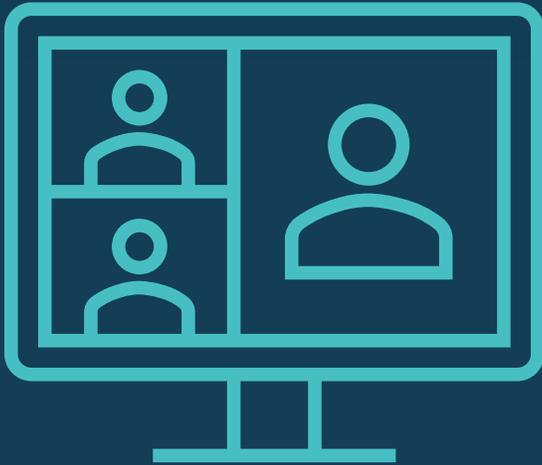
15

## A Greenprint is not...

- A regulation, policy document, report, plan, or manual.
- An acquisition map or regulatory plan that puts constraints on land use for any public or private entity.
- A complete inventory of everything important within an area or new data set.
- A comprehensive solution for natural resource protection.
- A requirement that stakeholders engage in projects.
- An effort to subvert private property rights.

16

## Project Outreach Priorities - Overview



- Project Committees
- 60+ advisors/4 interactive workshops
- Direct stakeholder meetings
- 8 Rapid assessment interviews
- Developed 6 user profiles
- Consultation with SCAG's Regional Planning Working Groups

## Summary of Feedback from August 24<sup>th</sup> Public Hearing

### Verbal Comments

- 34 total speakers
- 41% expressed support
- 41% expressed concerns
- 9% expressed support and concerns
- 9% had general feedback or questions

### Written Comments

- 39 total letters, 35 unique respondents/letters
- 74% expressed support
- 26% expressed concerns
- 17% of letters addressed specific data layers and 2 letters requested including additional data layers

# Summary of Proposed Data Layer List Survey



4,200+

Stakeholders invited to take survey



33

Survey respondents



69

Comments on individual data layers

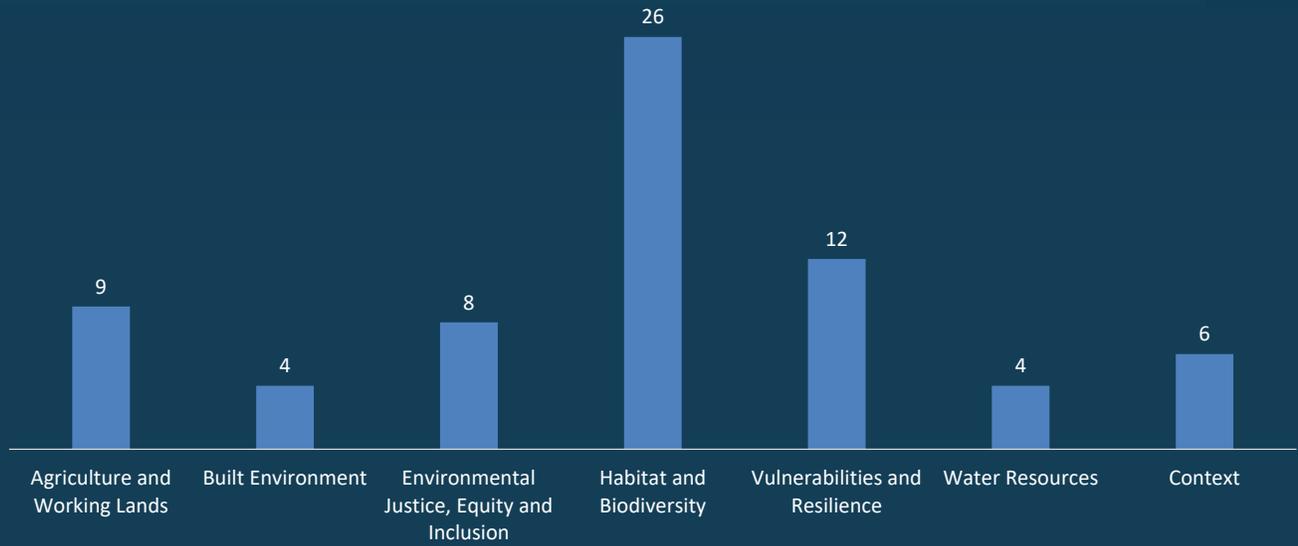


45

Data layers commented on

19

# Summary of Proposed Data Layer List Survey: Data Layer Feedback by Data Theme



n=69 comments

Note: Respondents were invited to submit comments on one or more data layers

1

## Summary of Proposed Data Layer List Survey: Data Layer Feedback



Survey Question: "Please provide any comments or feedback you have on this data set."

75%

of comments were generally supportive of the data layer(s)

13%

of comments offered suggestions to improve the data layer(s) or consider additional data

9%

of comments were neutral with respect to the data layer(s)

3%

of comments expressed concern over the data layer(s)

0%

of comments requested exclusion of the data layer(s)



n=69 comments  
Note: Respondents were invited to submit comments on one or more data layers

21

## Summary of Proposed Data Layer List Survey: Sentiment on Project Goal



Survey Question: "... Do you have any questions or concerns about the goal of the SoCal Greenprint?"

0%

of respondents expressed concern about the goal of the project

12%

of respondents expressed concern over pausing or not completing the project

53%

of respondents expressed no concern about the goal of the project

18%

of respondents expressed other concerns about the project

n=17 respondents  
Note: Not all survey respondents provided an answer to this question; n includes 3 null responses

21



## Frequently Cited Questions, Comments and Concerns

- Land use authority & general plans inclusion
- Data alignment
- Intergovernmental Review Program (IGR)
- Dataset use
- Specific datasets
- Inoperable/misdirected links repaired
- Project timeline
- Consultant selection
- Connect SoCal Mitigation Measures
- Pertinence of California Environmental Quality Act (CEQA)

## Data Vetting Criteria

- Data must be publicly available, meaning that existing datasets are available online or can be accessed if requested and/or licensed;
- Data was vetted for inclusion by science advisors; and,
- Data would support decision-making from the five key user groups identified through the planning process (planners, infrastructure agencies, developers, community-based organizations, and conservation organizations) based on suggestions and feedback from Science and Strategic Advisors;

## Proposed Next Steps to Address Stakeholder Concerns

- Removal and/or replacement of certain data layers
- Expanded Stakeholder Engagement and User Testing
  - SCAG's Technical Working Group (TWG)
  - Scientific Advisors
  - Advisory Committee
- Disclosure and User Acknowledgement
- User Acceptance Testing
- Regional Council & Energy and Environment Committee Tool Demonstration

21

## Staff Recommendation

1. *Proceed with developing the Greenprint as identified in Connect SoCal and its associated Program Environmental Impact Report (PEIR);*
2. *Include features in the tool to convey limitations and foster its proper use, such as a disclosure statement and mandatory user acknowledgement feature;*
3. *Conduct an open advisory meeting for further review and revision of data layers;*
4. *Remove datasets for inclusion in the tool if they are not publicly available (i.e. layers are accessible for download online, or are downloadable via request and/or license to the author or custodian of the data);*

## Staff Recommendation (continued)

5. *Complete prospective user testing with at least ten stakeholders representing the diverse array of potential users to ensure that the tool is working and functional as developed with targeted audiences*
6. *Engage in continued public outreach as described at the July 1, 2021 RC meeting; and*
7. *Return to the Regional Council and Energy & Environment Committee once prospective user testing is complete to demonstrate the tool and seek feedback prior to public launch.*

## Questions from the Regional Council

# Close Public Hearing

# Regional Council Discussion and Potential Action

Attachment: PowerPoint Presentation - SoCal Greenprint Hearing (SoCal Greenprint Update)

# Thank you!

[www.scag.ca.gov](http://www.scag.ca.gov)



b. Email Regarding Updated Presentation

**From:** [Maggie Aguilar](#)  
**Subject:** SCAG Supplemental Materials | October 7, 2021 Meetings | RC and EEC  
**Date:** Wednesday, October 6, 2021 9:12:48 PM

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Dear Members of the Regional Council (RC) and Energy and Environment Committee (EEC):

For the October 7, 2021 meeting, a revised PowerPoint for RC Agenda Item No. 1 and EEC Agenda Item No. 6, SoCal Greenprint Update has been posted to SCAG's website and may now be accessed through the current agendas page: <https://scag.ca.gov/current-agendas>.

We look forward to seeing you Thursday.

Thank you,  
Maggie

---

**From:** Maggie Aguilar <[aguilarm@scag.ca.gov](mailto:aguilarm@scag.ca.gov)>  
**Sent:** Friday, October 1, 2021 3:54 PM  
**To:** Maggie Aguilar <[aguilarm@scag.ca.gov](mailto:aguilarm@scag.ca.gov)>  
**Subject:** SCAG AGENDAS: October 7, 2021 Meetings | CEHD, EEC, TC and RC

Dear Members of the Regional Council and Policy Committees:

As a friendly reminder, the **Thursday, October 7, 2021**, Policy Committees and Regional Council meetings will be by **remote participation only**. The agenda packets may now be accessed via the Meeting Portal here: <http://scag.iqm2.com/Citizens/> or SCAG website: <https://scag.ca.gov/current-agendas>.

**For quorum purposes, please reply to this email if you are able to attend your respective meetings.**

Please note meeting times and dedicated Zoom information below.

**9:30 AM – 11:30 AM Community, Economic and Human Development (CEHD) Committee**

**Participate by Zoom:** <https://scag.zoom.us/j/116153109>

**Participate by Phone:** 1-669-900-6833 / Meeting ID: 116 153 109

**9:30 AM – 11:30 AM Energy and Environment Committee (EEC)**

**Participate by Zoom:** <https://scag.zoom.us/j/317727062>

**Participate by Phone:** 1-669-900-6833 / Meeting ID: 317 727 062

**9:30 AM – 11:30 AM Transportation Committee (TC)**

**Participate by Zoom:** <https://scag.zoom.us/j/253270430>

**Participate by Phone:** 1-669-900-6833 / Meeting ID: 253 270 430

**12:30 PM – 2:00 PM *Regional Council (RC)***

**Participate by Zoom:** <https://scag.zoom.us/j/249187052>

**Participate by Phone:** Dial 1-669-900-6833 / Meeting ID: 249 187 052

Thank you and we look forward to your remote participation.

Best,  
Maggie

<https://www.scag.ca.gov/>



Maggie Aguilar  
Clerk of the Board  
Tel: +1 (213) 630-1420  
aguilarm@scag.ca.gov

SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS  
900 Wilshire Blvd., Ste. 1700, Los Angeles, CA 90017



# Greenprint Public Hearing

**October 7, 2021**

**12:30 PM**

[www.scag.ca.gov](http://www.scag.ca.gov)



1

## Agenda



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**Questions from the Regional Council**

**Close Public Hearing**

**Regional Council Discussion and Potential Action**

2

# Welcome and Introduction

## Staff Recommendation UPDATED

Staff recommends that the Regional Council **continue** ~~remove~~ the pause on Greenprint implementation as directed on July 1, 2021, **and with additional direction that staff** ~~direct staff to:~~

1. **Develop** a white paper and work with a 5-member advisory task group of the Regional Council (appointed by the President and which will automatically disband upon reporting its findings to the Regional Council as provided in Item 8 below) on establishing a policy framework for advanced mitigation in the SCAG region to ensure the Greenprint is aligned with policy objectives;
2. ~~Proceed with developing~~ **Develop** the SoCal Greenprint as identified in Connect SoCal and its associated Program Environmental Impact Report (PEIR) **with explicit focus on helping cities, counties and transportation agencies make better land-use and transportation infrastructure decisions and conserve natural and farm lands;**
3. Include features in the SoCal Greenprint to convey limitations and foster its proper use, such as a disclosure statement and mandatory user acknowledgement feature;

## Staff Recommendation UPDATED (continued)

4. Conduct an open advisory meeting for further review and revision of data layers **to meet the needs of cities, counties and transportation agencies**;
5. Remove datasets for inclusion in the tool if they are not publicly available (i.e. layers are accessible for download online, or are downloadable via request and/or license to the author or custodian of the data);
6. Complete prospective user testing with at least ten stakeholders representing ~~the diverse array of potential users~~ **cities, counties and transportation agencies** to ensure that the tool is working and functional as developed with targeted audiences;
7. Engage in continued public outreach as described at the July 1, 2021 RC meeting; and
8. Return to the Regional Council and Energy & Environment Committee once prospective user testing is complete to demonstrate the tool, **provide a report on the white paper and a proposed policy framework**, ~~and~~ seek feedback prior to public launch **and to remove the pause**.

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## SoCal Greenprint Public Hearing

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October 7<sup>th</sup>, 2021

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- Balance with regional housing production
- Natural & Farm Lands Conservation Technical Report

### Climate Emergency (Resolution 21-628-1)

- Regional Council adopted January 2021
- Greenprint tool to highlight the benefits of natural lands, water and agricultural lands

## Regional Policy: Sustainable Communities Strategies

### Sustainable Communities Strategies

- Climate adaptation, hazard mitigation, & community resiliency support
- Renewable energy production, urban heat island, and carbon sequestration support
- Local food production
- Resource efficient development
- Regional wildlife connectivity
- Reduce consumption of resource areas, including agricultural land
- Public park space access



## Connect SoCal PEIR

### Mitigation Measures

- **SMM AG-2:** *“SCAG shall use the Greenprint to identify priority conservation areas in support of advanced mitigation efforts in the region”*
- **SMM BIO-2:** *“New regional tools like the Greenprint will provide an easily accessible resource to help municipalities, conservation groups, developers and researchers prioritize lands for conservation based on the best available scientific data”*

Lead agencies may use, amend, or not use measures identified in the PEIR as appropriate to address project-specific conditions. The determination of significance and identification of appropriate mitigation is solely the responsibility of the lead agency.

## What is a Greenprint?

- A **data tool** that can help to advance the pace and scale of voluntary conservation in a region.
- A **data tool** that identifies landscape features that are important to residents and communities, like recreation, habitat, water resources, habitat, climate change resiliency or community.
- A **data tool** that illustrates how conservation values may work in concert with each other and with other values, like climate resilience.
- A **resource** that helps stakeholders understand factors in a specific area to help facilitate collaboration.
- An **information tool** to support data-driven decision making for infrastructure investments.

## A Greenprint is not...

- A regulation, policy document, report, plan, or manual.
- An acquisition map or regulatory plan that puts constraints on land use for any public or private entity.
- A complete inventory of everything important within an area or new data set.
- A comprehensive solution for natural resource protection.
- A requirement that stakeholders engage in projects.
- An effort to subvert private property rights.

## Project Outreach Priorities - Overview



- Project Committees
- 60+ advisors/4 interactive workshops
- Direct stakeholder meetings
- 8 Rapid assessment interviews
- Developed 6 user profiles
- Consultation with SCAG's Regional Planning Working Groups

## Summary of Feedback from August 24<sup>th</sup> Public Hearing

### Verbal Comments

- 34 total speakers
- 41% expressed support
- 41% expressed concerns
- 9% expressed support and concerns
- 9% had general feedback or questions

### Written Comments

- 39 total letters, 35 unique respondents/letters
- 74% expressed support
- 26% expressed concerns
- 17% of letters addressed specific data layers and 2 letters requested including additional data layers

## Summary of Proposed Data Layer List Survey



4,200+

Stakeholders invited to take survey



33

Survey respondents



69

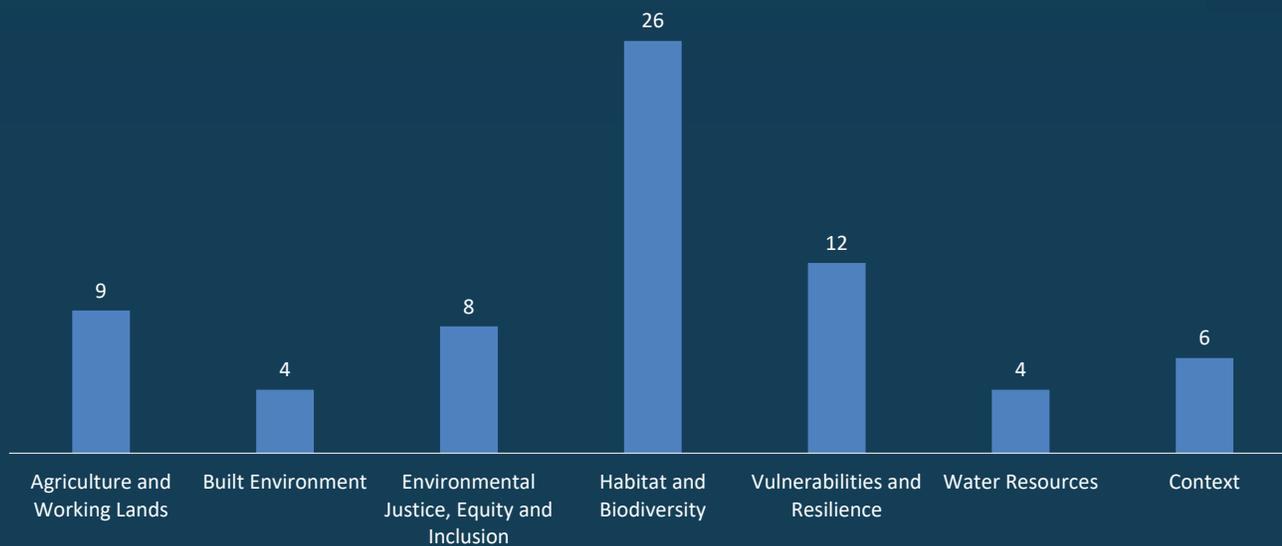
Comments on individual data layers



45

Data layers commented on

## Summary of Proposed Data Layer List Survey: Data Layer Feedback by Data Theme



n=69 comments

Note: Respondents were invited to submit comments on one or more data layers

## Summary of Proposed Data Layer List Survey: Data Layer Feedback



Survey Question: "Please provide any comments or feedback you have on this data set."

75%

of comments were generally supportive of the data layer(s)

13%

of comments offered suggestions to improve the data layer(s) or consider additional data

9%

of comments were neutral with respect to the data layer(s)

3%

of comments expressed concern over the data layer(s)

0%

of comments requested exclusion of the data layer(s)



n=69 comments  
Note: Respondents were invited to submit comments on one or more data layers

23

## Summary of Proposed Data Layer List Survey: Sentiment on Project Goal



Survey Question: "... Do you have any questions or concerns about the goal of the SoCal Greenprint?"

0%

of respondents expressed concern about the goal of the project

12%

of respondents expressed concern over pausing or not completing the project

53%

of respondents expressed no concern about the goal of the project

18%

of respondents expressed other concerns about the project

n=17 respondents  
Note: Not all survey respondents provided an answer to this question; n includes 3 null responses

24



## Frequently Cited Questions, Comments and Concerns

- Land use authority & general plans inclusion
- Data alignment
- Intergovernmental Review Program (IGR)
- Dataset use
- Specific datasets
- Inoperable/misdirected links repaired
- Project timeline
- Consultant selection
- Connect SoCal Mitigation Measures
- Pertinence of California Environmental Quality Act (CEQA)

## Data Vetting Criteria

- Data must be publicly available, meaning that existing datasets are available online or can be accessed if requested and/or licensed;
- Data was vetted for inclusion by science advisors; and,
- Data would support decision-making from the five key user groups identified through the planning process (planners, infrastructure agencies, developers, community-based organizations, and conservation organizations) based on suggestions and feedback from Science and Strategic Advisors;

## Proposed Next Steps to Address Stakeholder Concerns

- Removal and/or replacement of certain data layers
- Expanded Stakeholder Engagement and User Testing
  - *SCAG's Technical Working Group (TWG)*
  - *Scientific Advisors*
  - *Advisory Committee*
- Disclosure and User Acknowledgement
- User Acceptance Testing
- Regional Council & Energy and Environment Committee Tool Demonstration

## Staff Recommendation UPDATED

Staff recommends that the Regional Council **continue** ~~remove~~ the pause on Greenprint implementation as directed on July 1, 2021, **and with additional direction that staff** ~~direct staff to:~~

1. **Develop** a white paper and work with a 5-member advisory task group of the Regional Council (appointed by the President and which will automatically disband upon reporting its findings to the Regional Council as provided in Item 8 below) on establishing a policy framework for advanced mitigation in the SCAG region to ensure the Greenprint is aligned with policy objectives;
2. ~~Proceed with developing~~ **Develop** the SoCal Greenprint as identified in Connect SoCal and its associated Program Environmental Impact Report (PEIR) **with explicit focus on helping cities, counties and transportation agencies make better land-use and transportation infrastructure decisions and conserve natural and farm lands;**
3. Include features in the SoCal Greenprint to convey limitations and foster its proper use, such as a disclosure statement and mandatory user acknowledgement feature;

## Staff Recommendation UPDATED (continued)

4. Conduct an open advisory meeting for further review and revision of data layers **to meet the needs of cities, counties and transportation agencies;**
5. Remove datasets for inclusion in the tool if they are not publicly available (i.e. layers are accessible for download online, or are downloadable via request and/or license to the author or custodian of the data);
6. Complete prospective user testing with at least ten stakeholders representing ~~the diverse array of potential users~~ **cities, counties and transportation agencies** to ensure that the tool is working and functional as developed with targeted audiences;
7. Engage in continued public outreach as described at the July 1, 2021 RC meeting; and
8. Return to the Regional Council and Energy & Environment Committee once prospective user testing is complete to demonstrate the tool, **provide a report on the white paper and a proposed policy framework,** ~~and~~ seek feedback prior to public launch **and to remove the pause.**

## Questions from the Regional Council

## Close Public Hearing

## Regional Council Discussion and Potential Action

# Thank you!

[www.scag.ca.gov](http://www.scag.ca.gov)



d. Email Regarding Supplemental Staff Report

**From:** [Maggie Aguilar](#)  
**Subject:** SCAG: Supplemental Staff Report – SoCal Greenprint Refined/Clarified Recommended Action for RC  
**Date:** Wednesday, October 6, 2021 4:11:10 PM

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Dear Members of the Regional Council (RC) and Energy and Environment Committee (EEC),

A supplemental staff report for the SoCal Greenprint Update for the upcoming RC and EEC meetings to be held on October 7, 2021 (Agenda Items 1 and 6, respectively) has been posted to the website and can be accessed here: <https://scag.ca.gov/sites/main/files/file-attachments/rc-eeec-100721-agn01-06-supplemental-staff-report.pdf?1633561194>.

We look forward to your participation.

Best,  
Maggie

We look forward to your participation.

Best,  
Maggie



Maggie Aguilar  
Clerk of the Board  
Tel: +1 (213) 630-1420  
aguilarm@scag.ca.gov

SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS  
900 Wilshire Blvd., Ste. 1700, Los Angeles, CA 90017



Agenda Items 1 (RC) and 6 (EEC)  
Supplemental Staff Report  
Remote Participation Only  
October 7, 2021

**To:** Energy & Environment Committee (EEC)  
Regional Council (RC)

**From:** Jason Greenspan, Manager of Sustainability  
(213) 236-1859, greenspan@scag.ca.gov

**Subject:** Supplemental Staff Report – SoCal Greenprint  
Refined/Clarified Recommended Action for RC

EXECUTIVE DIRECTOR'S  
APPROVAL

**Background and Purpose of Supplemental Report:**

Following distribution of the Staff Report for the SoCal Greenprint Update for the upcoming RC and EEC meetings to be held on October 7, 2021 (Agenda Items 1 and 6, respectively), staff believes that refinement and clarification of the recommended action for the RC is warranted, for RC consideration.

**Recommended Action for RC:**

Staff proposes refining and clarifying the Recommended Action as follows (a comparison showing revisions to the initial staff recommendation is attached to this Supplemental Report):

*Staff recommends that the Regional Council continue the pause on Greenprint implementation as directed on July 1, 2021, with additional direction that staff:*

1. *Develop a white paper and work with a 5-member advisory task group of the Regional Council (appointed by the President and which will automatically disband upon reporting its findings to the Regional Council as provided in Item 8 below) on establishing a policy framework for advanced mitigation in the SCAG region to ensure the Greenprint is aligned with policy objectives;*
2. *Develop the SoCal Greenprint as identified in Connect SoCal and its associated Program Environmental Impact Report (PEIR) with explicit focus on helping cities, counties and transportation agencies make better land-use and transportation infrastructure decisions and conserve natural and farm lands;*
3. *Include features in the SoCal Greenprint to convey limitations and foster its proper use, such as a disclosure statement and mandatory user acknowledgement feature;*
4. *Conduct an open advisory meeting for further review and revision of data layers to meet the needs of cities, counties and transportation agencies;*

**OUR MISSION**

*To foster innovative regional solutions that improve the lives of Southern Californians through inclusive collaboration, visionary planning, regional advocacy, information sharing, and promoting best practices.*

**OUR VISION**

*Southern California's Catalyst for a Brighter Future*

**OUR CORE VALUES**

*Be Open | Lead by Example | Make an Impact | Be Courageous*

- 
5. *Remove datasets for inclusion in the tool if they are not publicly available (i.e. layers are accessible for download online, or are downloadable via request and/or license to the author or custodian of the data);*
  6. *Complete prospective user testing with at least ten stakeholders representing cities, counties and transportation agencies to ensure that the tool is working and functional as developed with targeted audiences;*
  7. *Engage in continued public outreach as described at the July 1, 2021 RC meeting; and*
  8. *Return to the Regional Council and Energy & Environment Committee once prospective user testing is complete to demonstrate the tool, provide a report on the white paper and a proposed policy framework, -seek feedback prior to public launch and to remove the pause.*

Attachment: Comparison

Comparison

Key: **Yellow highlighting** = additions  
**Red strikethrough** = deletions

**[Note: Update this language if any changes made.]**

Staff recommends that the Regional Council ~~continue~~ **remove** the pause on Greenprint implementation as directed on July 1, 2021, ~~and~~ with additional direction that staff ~~direct staff to:~~

1. **Develop a white paper and work with a 5-member advisory task group of the Regional Council (appointed by the President and which will automatically disband upon reporting its findings to the Regional Council as provided in Item 8 below) on establishing a policy framework for advanced mitigation in the SCAG region to ensure the Greenprint is aligned with policy objectives;**
2. ~~Proceed with developing~~ **Develop** the SoCal Greenprint as identified in Connect SoCal and its associated Program Environmental Impact Report (PEIR) **with explicit focus on helping cities, counties and transportation agencies make better land-use and transportation infrastructure decisions and conserve natural and farm lands;**
3. Include features in the SoCal Greenprint to convey limitations and foster its proper use, such as a disclosure statement and mandatory user acknowledgement feature;
4. Conduct an open advisory meeting for further review and revision of data layers **to meet the needs of cities, counties and transportation agencies;**
5. Remove datasets for inclusion in the tool if they are not publicly available (i.e. layers are accessible for download online, or are downloadable via request and/or license to the author or custodian of the data);
6. Complete prospective user testing with at least ten stakeholders representing ~~the diverse array of potential users~~ **cities, counties and transportation agencies** to ensure that the tool is working and functional as developed with targeted audiences;
7. Engage in continued public outreach as described at the July 1, 2021 RC meeting; and
8. Return to the Regional Council and Energy & Environment Committee once prospective user testing is complete to demonstrate the tool, **provide a report on the white paper and a proposed policy framework,** ~~and~~ seek feedback prior to public launch **and to remove the pause.**

f. Email Regarding Public Comments before 5pm

**From:** [Maggie Aguilar](#)  
**Subject:** SCAG Public Comments Received Before the 5pm Deadline | October 7, 2021 Meetings | RC and EEC  
**Date:** Wednesday, October 6, 2021 9:00:07 PM

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Dear Members of the Regional Council (RC) and Energy and Environment Committee (EEC):

For the October 7, 2021 meetings of the RC and EEC, SCAG has received forty-two (42) written comments before the 5:00 p.m. deadline today, October 6, 2021. The comments pertain to RC Agenda Item No. 1 and EEC Agenda Item No. 6, SoCal Greenprint Update.

The public comments are now posted to the current agendas page:

<https://scag.ca.gov/sites/main/files/file-attachments/rc-eeec-100721-public-comments.pdf?1633575920> and the SoCal Greenprint Public Hearing & Comments page: <https://scag.ca.gov/socal-greenprint-public-hearing-comments>.

We look forward to your remote participation tomorrow.

Thank you,  
Maggie

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**From:** Maggie Aguilar <[aguilarm@scag.ca.gov](mailto:aguilarm@scag.ca.gov)>  
**Sent:** Friday, October 1, 2021 3:54 PM  
**To:** Maggie Aguilar <[aguilarm@scag.ca.gov](mailto:aguilarm@scag.ca.gov)>  
**Subject:** SCAG AGENDAS: October 7, 2021 Meetings | CEHD, EEC, TC and RC

Dear Members of the Regional Council and Policy Committees:

As a friendly reminder, the **Thursday, October 7, 2021**, Policy Committees and Regional Council meetings will be by **remote participation only**. The agenda packets may now be accessed via the Meeting Portal here: <http://scag.igq2.com/Citizens/> or SCAG website: <https://scag.ca.gov/current-agendas>.

**For quorum purposes, please reply to this email if you are able to attend your respective meetings.**

Please note meeting times and dedicated Zoom information below.

**9:30 AM – 11:30 AM Community, Economic and Human Development (CEHD) Committee**

**Participate by Zoom:** <https://scag.zoom.us/j/116153109>

**Participate by Phone:** 1-669-900-6833 / Meeting ID: 116 153 109

**9:30 AM – 11:30 AM Energy and Environment Committee (EEC)**

**Participate by Zoom:** <https://scag.zoom.us/j/317727062>

**Participate by Phone:** 1-669-900-6833 / Meeting ID: 317 727 062

**9:30 AM – 11:30 AM *Transportation Committee (TC)***

**Participate by Zoom:** <https://scag.zoom.us/j/253270430>

**Participate by Phone:** 1-669-900-6833 / Meeting ID: 253 270 430

**12:30 PM – 2:00 PM *Regional Council (RC)***

**Participate by Zoom:** <https://scag.zoom.us/j/249187052>

**Participate by Phone:** Dial 1-669-900-6833 / Meeting ID: 249 187 052

Thank you and we look forward to your remote participation.

Best,  
Maggie



Maggie Aguilar  
Clerk of the Board  
Tel: +1 (213) 630-1420  
aguilarm@scag.ca.gov

SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS  
900 Wilshire Blvd., Ste. 1700, Los Angeles, CA 90017



**Regional Council (RC) and Energy and Environment Committee (EEC)****List of Public Comments**

Received before 5pm on Wednesday, October 6, 2021

	<b>Date</b>	<b>Signatory Name</b>	<b>Organization</b>	<b>Agenda Item (AI #)</b>	<b>Subject Matter</b>
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

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

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

			<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

		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



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**

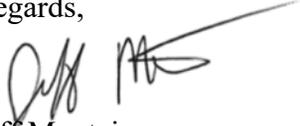
Dear Mr. Ajise:

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,

  
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**”

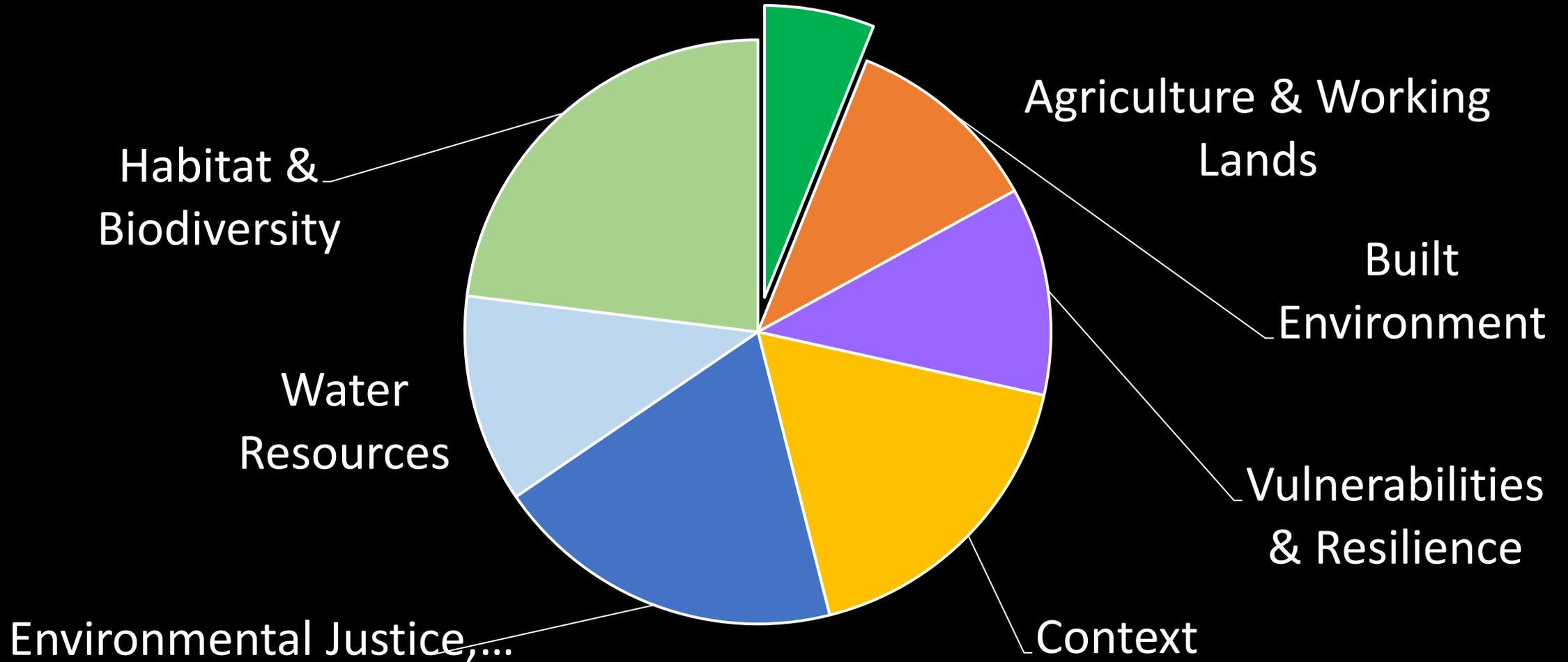
# “Stakeholder Outreach” for Greenprint

- 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”

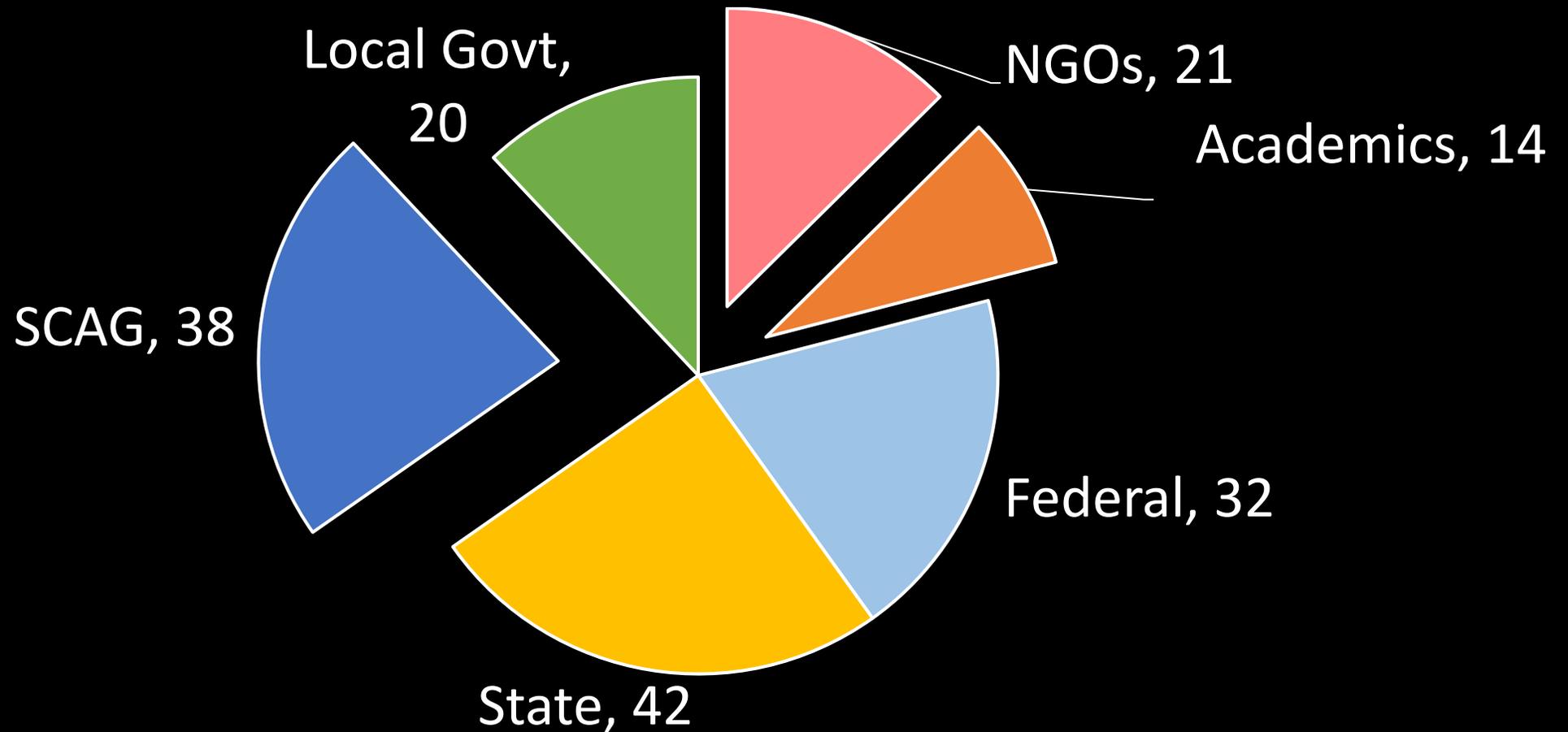
# SoCal Business Coalition & Greenprint

- 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

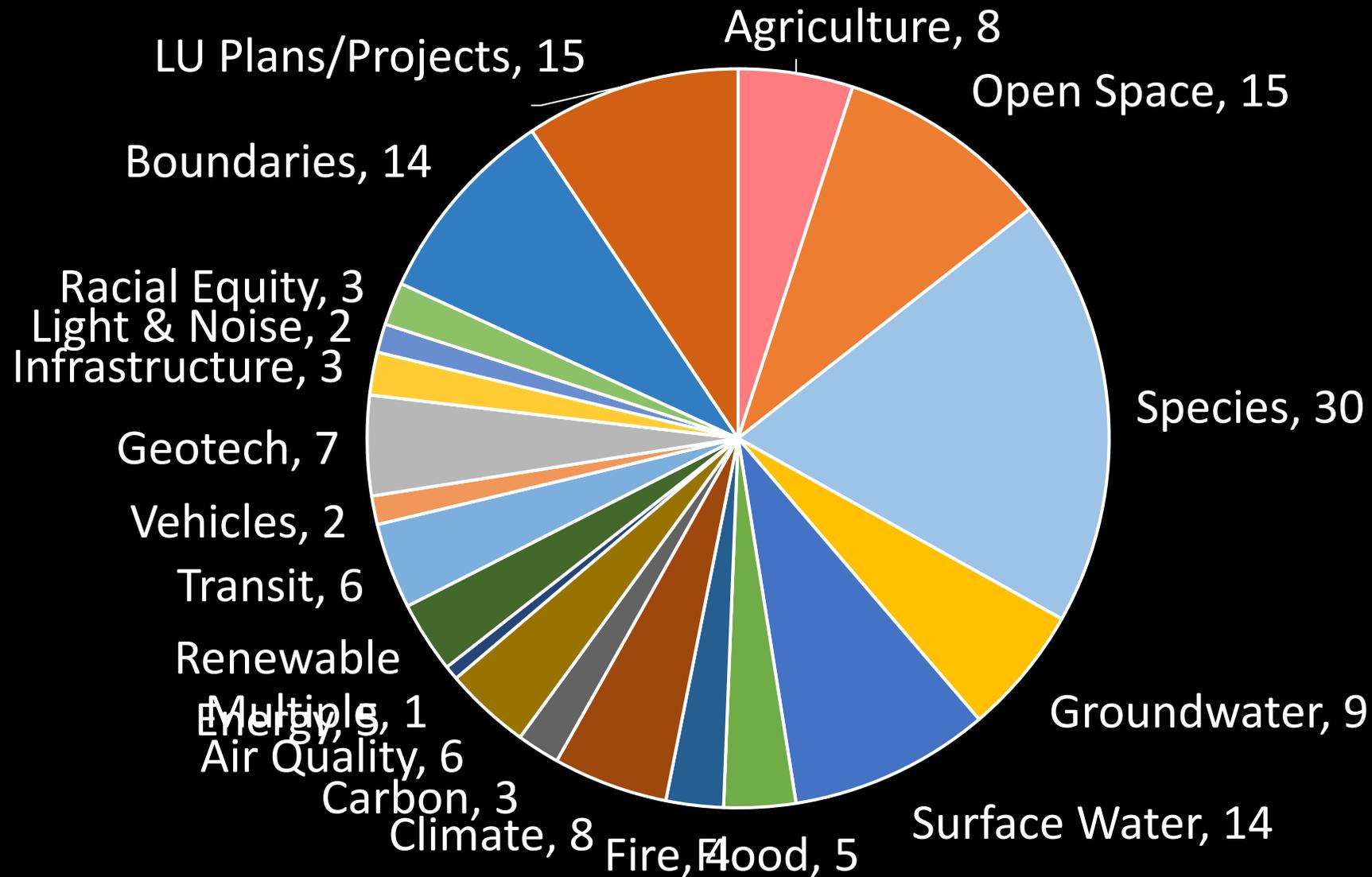
# Staff-Proposed 166-Dataset “Greenprint”



# Sources of 166 Greenprint Data Sets



# Topics Covered by 166 Datasets



# Recommended Approach (Fast-Track Option 1)

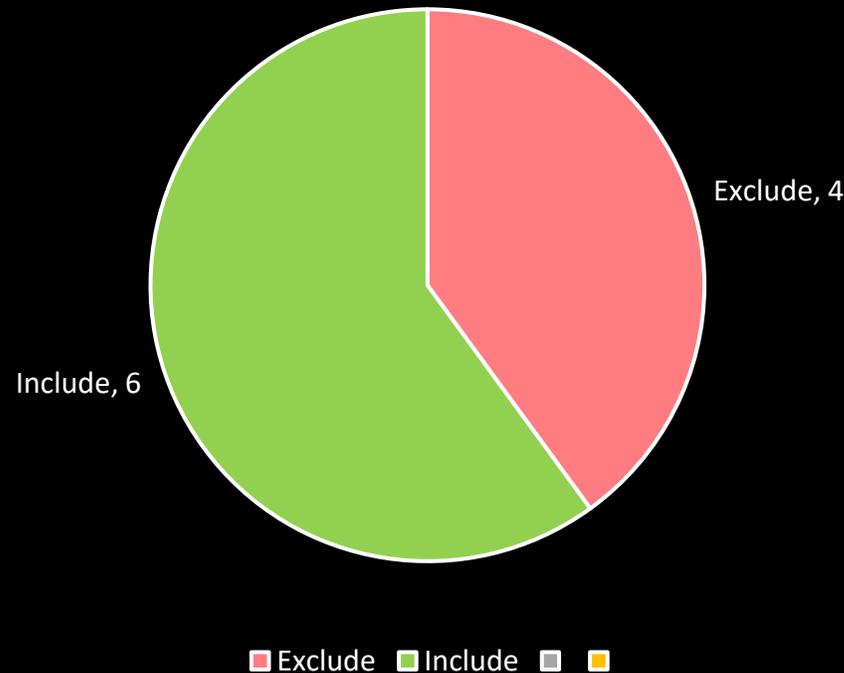
- Use “Greenprint” to map attributes of lands designated for Agriculture and/or Open Space Uses by counties or cities in the Sixth Cycle Housing Element/General Plan Update
  - Consistent with Greenprint Description and Connect SoCal Plan Placement in Agricultural and Working Lands Appendix to guide 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?

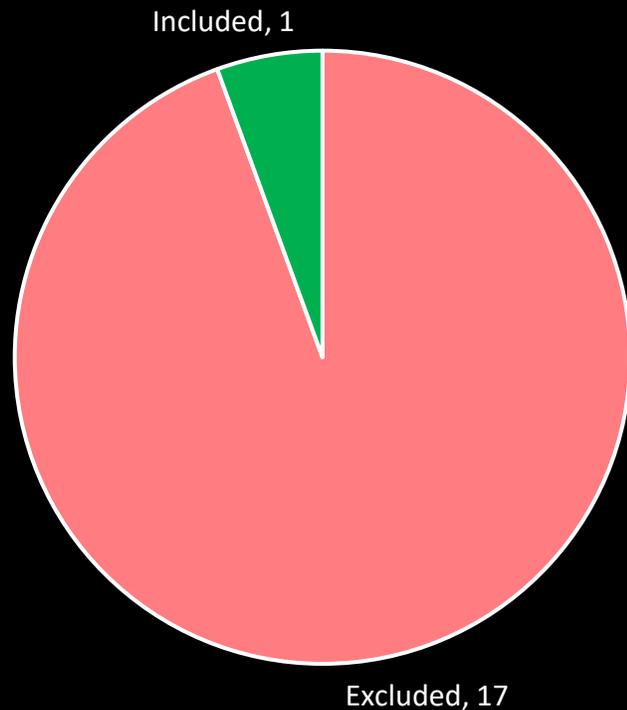


## Dataset Exclusion Criteria

- 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?

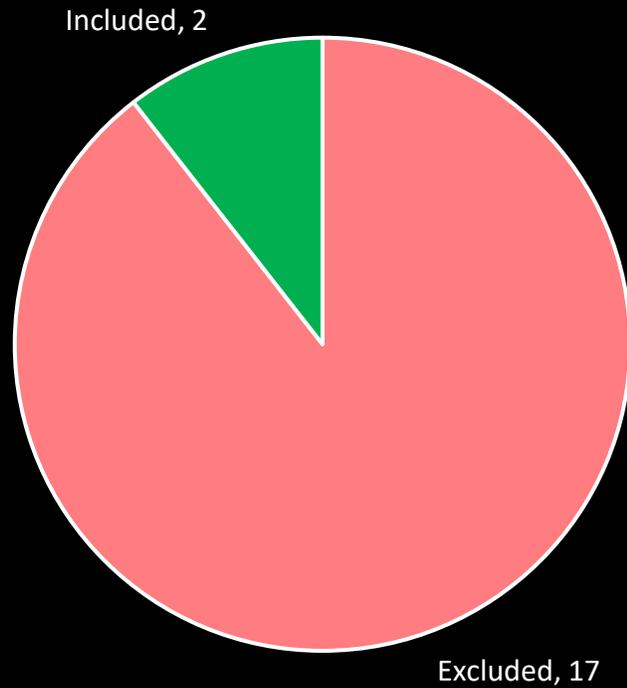


## Dataset Exclusion Criteria

- 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?

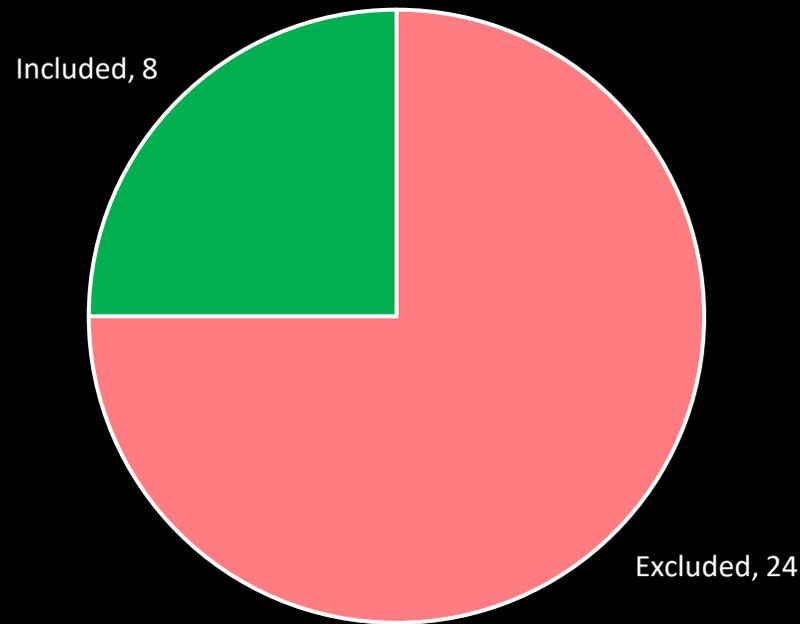


## Dataset Exclusion Criteria

- 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?

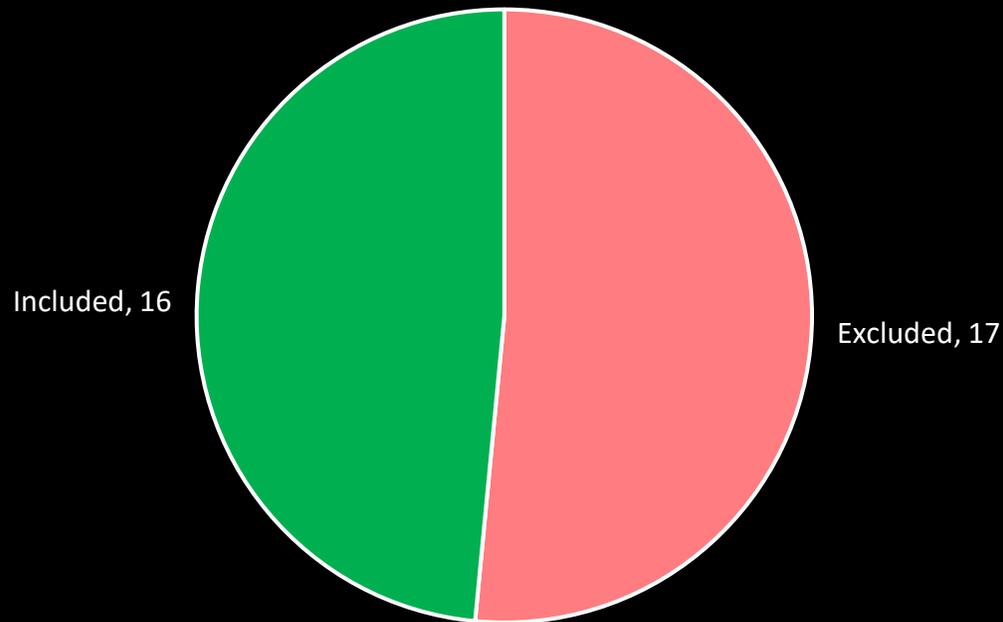


## Dataset Exclusion Criteria

- 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?

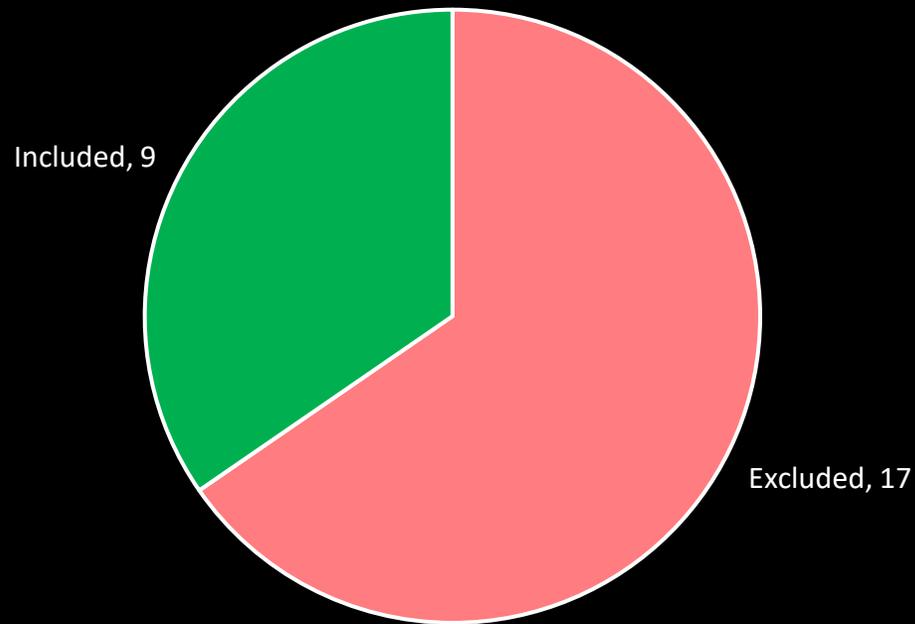


## Dataset Exclusion Criteria

- 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.<sup>1</sup> In other words, SCAG should not elevate each of the 166 potential data sets thus far identified by SCAG's staff to constitute 166 separate points of contention for 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

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<sup>1</sup> CEQA Guidelines section 15125(d) generally requires local jurisdictions acting as lead agencies to discuss and rationalize "any inconsistencies between the project and regional plans."

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.<sup>2</sup> Importantly, even where SCAG labeled land as "high value habitat" back in 2016, any such labeling could be dealt with very easily and locally by undertaking or having in hand a local or project-specific habitat study, whereby superior local knowledge based on presence would speedily prevail. Therefore, SCAG's 2016 RTP/SCS delineations and the labeling of natural lands by their supposed habitat value did not create any Herculean CEQA challenges that might undermine, hamstring, or reverse local land use decision-making. For the reasons discussed above, however, if our concerns stated above 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

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<sup>2</sup> SCAG's 2016 Natural and Farm Lands technical appendix, at page 3, explained that SCAG's habitat delineation was based on its own, internal analysis of "more than 70 GIS databases." The discussion and context suggest that these were mostly data sets published by the California Department of Fish and Wildlife and the United States Fish and Wildlife Service – which constitute data that are routinely applied to local land use decisions.

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](mailto:Diane.sacks@mrca.ca.gov)  
[Spencer.eldred@mrca.ca.gov](mailto:Spencer.eldred@mrca.ca.gov)  
[Info@dmca.gov](mailto: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.<sup>1</sup>

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

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<sup>1</sup> 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](mailto: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](mailto: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

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## Building Industry Association of Southern California, Inc.

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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.

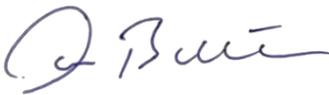
Our concerns were recently validated by a letter from City of Irvine Councilman Michael Carroll, a SCAG Regional Council Member. We hope that this letter is properly shared with all members of the Regional Council and that resolution can be achieved before SCAG staff advances the Greenprint in a way 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.

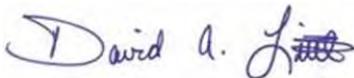
Sincerely,



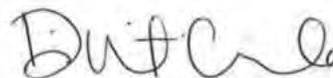
Dave Bartlett, Brookfield Residential  
BIA Southern California President



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



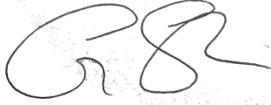
Adam S. Wood  
BIASC Vice President-Orange County



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

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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



October 1, 2021

Regional Council  
Southern California Association of Governments  
900 Wilshire Blvd., Ste. 1700  
Los Angeles, CA 90017  
[scagreenregion@scag.ca.gov](mailto:scagreenregion@scag.ca.gov), [rey@scag.ca.gov](mailto: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](mailto:ajise@scag.ca.gov)

Clint Lorimore, President, [lorimore@scag.ca.gov](mailto:lorimore@scag.ca.gov)

India Brookover, Greenprint Lead, [brookover@scag.ca.gov](mailto: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 ft<sup>2</sup> (230 billion m<sup>2</sup>) 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

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[www.aialosangeles.org](http://www.aialosangeles.org)

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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](mailto: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](http://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](mailto: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 7<sup>th</sup> 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](http://www.CoyoteHills.org)

October 4, 2021

Submitted via email to: [SCAGGreenRegion@scag.ca.gov](mailto:SCAGGreenRegion@scag.ca.gov)

**Board of Directors:**

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Audubon, Sea & Sage Chapter  
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Cal. Native Plant Society  
Southern California Botanists  
Roots and Shoots Cal State Fullerton  
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Paul Nagel  
Sharon Quirk-Silva  
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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

O: (213) 639-0764



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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,

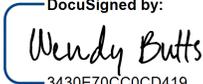
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As the region prepares for economic recovery following the pandemic, and cities across Southern California prepare to accommodate new housing and economic growth, any further delays to the SoCal Greenprint mean that this useful resource will not be 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,

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.

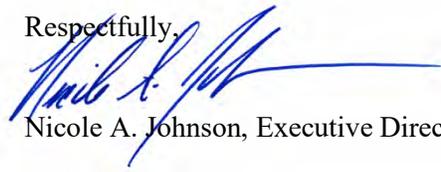
The October 7th meeting is the third public meeting where the SCAG Regional Council has received input from more than 80 organizations who have expressed the need for a data-driven resources that supports the region's environmental and development goals. The public meetings are in addition to the outreach 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 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](mailto: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](mailto: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](mailto:scaggreenregion@scag.ca.gov)

[epubliccomment@scag.ca.gov](mailto: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 18<sup>th</sup> 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.

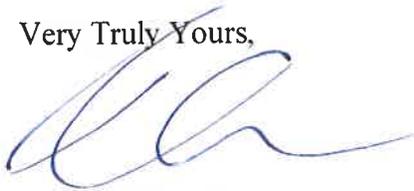
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Tejon Ranch Co. (NYSE:TRC)—a diversified real estate development and agribusiness company.

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 5<sup>th</sup> 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](mailto:mpatino@saje.net)

525 S. Hewitt St.  
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Seth Stronin - 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](http://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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Laura Mask - Lennar Homes

Edmund Novy - Fondation Enfant Jesus

Marcela Oliva - LA Trade Tech

Seth Stronin - ARIIP

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,



**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](mailto:Brivas@laane.org)

**O** (213) 977- 9400 ext. 105

**M** [REDACTED]

**P** She/Her/Hers



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Los Angeles, CA 90017

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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 7<sup>th</sup> 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.

---

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[www.ccair.org](http://www.ccair.org)

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 7<sup>th</sup> 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, appearing to read "Meea Kang". The signature is fluid and cursive, written over a light grey horizontal line.

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?

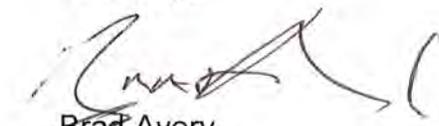
**Optional Advanced Mitigation?** There is further lack of direction on the calls for local agencies to employ Greenprint for advanced mitigation purposes. The staff report briefly describes, “Identifying mitigation opportunities early in the planning stages can reduce costs for projects and can also 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

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](mailto: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, sweeping tail on the final letter.

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](mailto: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

STATE CAPITOL  
P.O. BOX 942849  
SACRAMENTO, CA 94249-0043  
(916) 319-2043  
FAX (916) 319-2143

DISTRICT OFFICE  
300 EAST MAGNOLIA BOULEVARD, SUITE 504  
BURBANK, CA 91502  
(818) 558-3043  
FAX (818) 558-3042

E-MAIL  
Assemblymember.Friedman@assembly.ca.gov



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)



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*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](mailto: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](mailto: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 24<sup>th</sup> 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 6<sup>th</sup> 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

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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



October 7, 2021

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

RE: SoCal Greenprint October 7<sup>th</sup> 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”**

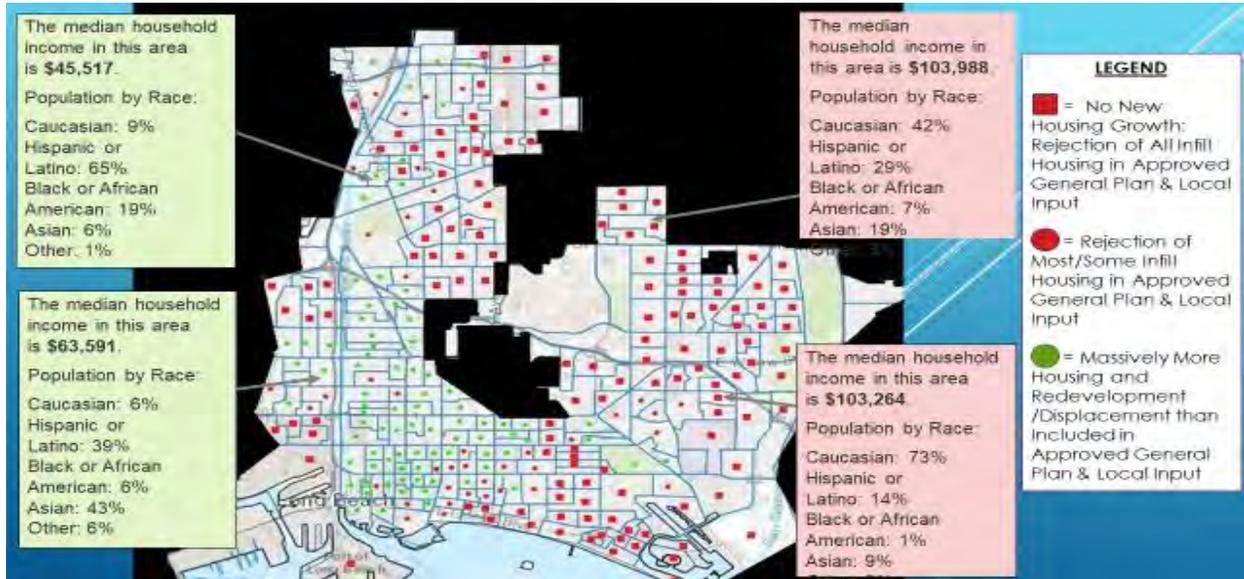
In 2020, (contrary to dozens of assurances that Connect SoCal respected “local input” and deferred to “local control,”) SCAG developed Traffic Analysis Zone maps identifying where new housing should – and should not – be allowed to achieve “vehicle mile traveled” mandates dictated by the California Air 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:

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

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

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

h. Email Regarding Public Comments after 5pm

**From:** [Maggie Aguilar](#)  
**Subject:** SCAG Public Comments Received After the 5pm Deadline | October 7, 2021 Meetings | RC and EEC  
**Date:** Thursday, October 7, 2021 8:35:10 PM

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Dear Members of the Regional Council (RC) and Energy and Environment Committee (EEC):

For today's meetings of the RC and EEC (October 7, 2021), SCAG received four (4) comments after the 5:00 p.m. deadline on October 6, 2021, pertaining to RC Agenda Item 1 and EEC Agenda Item 6 - SoCal Greenprint Update.

The public comments are now posted to the current agendas page: <https://scag.ca.gov/current-agendas> and the SoCal Greenprint Public Hearing & Comments page: <https://scag.ca.gov/socal-greenprint-public-hearing-comments>.

Thank you again for your participation at today's meetings.

Best,  
Maggie

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**From:** Maggie Aguilar <[aguilarm@scag.ca.gov](mailto:aguilarm@scag.ca.gov)>  
**Sent:** Wednesday, October 6, 2021 8:58 PM  
**To:** Maggie Aguilar <[aguilarm@scag.ca.gov](mailto:aguilarm@scag.ca.gov)>  
**Subject:** SCAG Public Comments Received Before the 5pm Deadline | October 7, 2021 Meetings | RC and EEC

Dear Members of the Regional Council (RC) and Energy and Environment Committee (EEC):

The public comments are now posted to the current agendas page: <https://scag.ca.gov/sites/main/files/file-attachments/rc-eeec-100721-public-comments.pdf?1633575920> and the SoCal Greenprint Public Hearing & Comments page: <https://scag.ca.gov/socal-greenprint-public-hearing-comments>.

We look forward to your remote participation tomorrow.

Thank you,  
Maggie

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**From:** Maggie Aguilar <[aguilarm@scag.ca.gov](mailto:aguilarm@scag.ca.gov)>  
**Sent:** Friday, October 1, 2021 3:54 PM  
**To:** Maggie Aguilar <[aguilarm@scag.ca.gov](mailto:aguilarm@scag.ca.gov)>  
**Subject:** SCAG AGENDAS: October 7, 2021 Meetings | CEHD, EEC, TC and RC

Dear Members of the Regional Council and Policy Committees:

As a friendly reminder, the **Thursday, October 7, 2021**, Policy Committees and Regional Council meetings will be by **remote participation only**. The agenda packets may now be accessed via the Meeting Portal here: <http://scag.ig2.com/Citizens/> or SCAG website: <https://scag.ca.gov/current-agendas>.

**For quorum purposes, please reply to this email if you are able to attend your respective meetings.**

Please note meeting times and dedicated Zoom information below.

**9:30 AM – 11:30 AM Community, Economic and Human Development (CEHD) Committee**

**Participate by Zoom:** <https://scag.zoom.us/j/116153109>

**Participate by Phone:** 1-669-900-6833 / Meeting ID: 116 153 109

**9:30 AM – 11:30 AM Energy and Environment Committee (EEC)**

**Participate by Zoom:** <https://scag.zoom.us/j/317727062>

**Participate by Phone:** 1-669-900-6833 / Meeting ID: 317 727 062

**9:30 AM – 11:30 AM Transportation Committee (TC)**

**Participate by Zoom:** <https://scag.zoom.us/j/253270430>

**Participate by Phone:** 1-669-900-6833 / Meeting ID: 253 270 430

**12:30 PM – 2:00 PM Regional Council (RC)**

**Participate by Zoom:** <https://scag.zoom.us/j/249187052>

**Participate by Phone:** Dial 1-669-900-6833 / Meeting ID: 249 187 052

Thank you and we look forward to your remote participation.

Best,  
Maggie



Maggie Aguilar  
Clerk of the Board  
Tel: +1 (213) 630-1420  
aguilarm@scag.ca.gov

SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS  
900 Wilshire Blvd., Ste. 1700, Los Angeles, CA 90017



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

**List of Public Comments**

Received after 5pm on Wednesday, October 6, 2021

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

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

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

Dear members of the SCAG Regional Council,

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

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

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

Sincerely,  
Henry Fung  
Covina, CA

Sent from my iPhone



October 06, 2021

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

Re: SoCal Greenprint Initiative

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

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

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

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

# Outward Bound Adventures



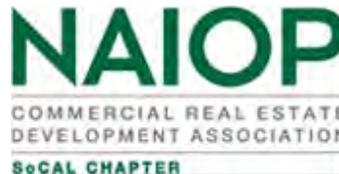
P.O. Box 202 | Pasadena, CA 91102 | 626 · 564 · 0844 | [www.obainc.org](http://www.obainc.org)

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

Thank you,

Charles Thomas

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



October 6, 2021

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

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

Dear President Lorimore and Regional Council Members:

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

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

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

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

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

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

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

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

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

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

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

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

Sincerely,



Richard Lambros, Managing Director  
Southern California Leadership Council



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



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



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



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



Jon Switalski, Executive Director  
Rebuild SoCal Partnership



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



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



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



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



Mario Rodriguez, Chairman  
Hispanic 100



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



Donna Duperron, President & CEO  
Torrance Area Chamber of Commerce



Barbara Thomas, Executive Director  
South Orange County Economic Coalition



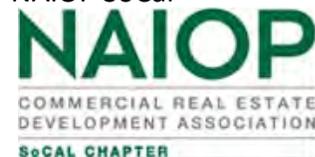
Louise Lampara, Executive Director  
Ventura County Coalition of Labor, Agriculture  
and Business (CoLAB)



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



Timothy Jemal, Chief Executive Officer  
NAIOP SoCal



Carolyn Cavecche, President & CEO  
Orange County Taxpayers Association





**SOUTHERN CALIFORNIA LEADERSHIP COUNCIL**



**Los Angeles County Business Federation**

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**SCCA**  
SOUTHERN CALIFORNIA CONTRACTORS ASSOCIATION



**SANTA CLARITA VALLEY Chamber of Commerce**



August 24, 2021

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

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

Dear President Lorimore and Regional Council Members:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Sincerely,



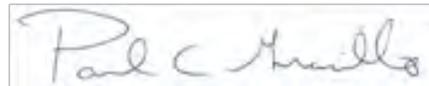
Richard Lambros, Managing Director  
Southern California Leadership Council



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



Jon Switalski, Executive Director  
Rebuild SoCal Partnership





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



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



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



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



Mario Rodriguez, Chairman  
Hispanic 100



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

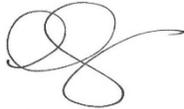


Donna Duperron, President & CEO  
Torrance Area Chamber of Commerce

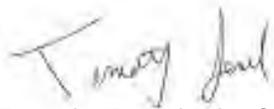


Barbara Thomas, Executive Director  
South Orange County Economic Coalition

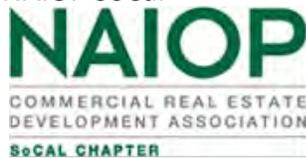




Louise Lampara, Executive Director  
Ventura County Coalition of Labor, Agriculture  
and Business (CoLAB)



Timothy Jemal, Chief Executive Officer  
NAIOP SoCal



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



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



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

October 7, 2021

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

Dear Hon. Lorimore,

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

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

**UPDATED RECOMMENDATIONS:**

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

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

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

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

Very truly yours,

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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**Agenda Item # – Regional Advanced Mitigation (RAMP) Research and Draft White Paper Outline**

1. Executive Summary
2. Regional Advance Mitigation Planning: An Overview
3. The Planning Process
4. Partners and Collaborators
5. Science and Methods
6. Scope and Scale
7. Roles, Authorities and Responsibilities
8. Funding and Financing

### Executive Summary

- Context
  - o Connect SoCal Core Vision
  - o Regional housing, transportation, water, energy & other infrastructure development
  - o State & Federal context (policy, regulatory)
- RAMP Summary
- Recommendations, Challenges, Next Steps

### Regional Advance Mitigation Planning: An Overview

- Describe Regional Advance Mitigation Planning (RAMP)
  - o Advances needed infrastructure projects
  - o Achieves conservation outcomes
  - o Expedite project delivery
- Describe current approach to mitigation vs. RAMP approach
  - o Benefits & challenges
  - o Describe existing SCAG region advance mitigation programs

### The Planning Process

- How RAMP works: tools and legal frameworks; regional and local planning.

### Partners and Collaborators

- Infrastructure agencies (transportation, energy, water)
- Development (housing, energy)
- Conservation (land trusts; mitigation bankers; regulatory agencies e.g. CDFW, USFWS, US Army Corps, US EPA, NMFS, habitat agencies)

### Science and Methods

- Scientific approach description
- Understanding demand for mitigation & supply

- Methods: tools, stakeholder engagement

## Scope and Scale

- SCAG region, Counties, Caltrans districts
- Regional plans (NCCPs, RCISs)
- Inter-jurisdictional: wildlife connectivity corridors, linear infrastructure, large sensitive habitats
- Mitigation Action Plans (MAPs):

## Roles, Authorities and Responsibilities

- Potential Roles for SCAG: link demand and supply; convener, data hub; mitigation program coordinator/sponsor
- Infrastructure and Development
- Regulatory agencies: coordination/communication, guidance, approve advance mitigation actions
- Conservation organizations, land trusts, mitigation bankers

## Funding and Financing

- Importance of funding and particular frameworks
- Funding model options
- Sources of funding

**Agenda Item # - Presentation from Orange County Transportation Commission (OCTA) on the Freeway Environmental Mitigation Program**

## FREEWAY ENVIRONMENTAL MITIGATION PROGRAM

**IMPACTED CITIES**  
All 34 Orange County cities and the County of Orange

**AT A GLANCE**

**FUNDING:** Approximately \$274 million available from OC Go (over 30 years)

**PROJECT MANAGER:** Lesley Hill  
Freeway Environmental Mitigation Program Project Manager  
(714) 560-5759  
lhill@octa.net

**COMMUNITY OUTREACH:** Marissa Espino  
(714) 560-5607  
mespino@octa.net

**WEBSITE:** [www.preservingourlegacy.org](http://www.preservingourlegacy.org)

Fact sheet as of 12/15/20



**PROGRAM DESCRIPTION**

The Orange County Transportation Authority's (OCTA) Freeway Environmental Mitigation Program (Mitigation Program) provides for comprehensive environmental mitigation for the impacts from freeway improvements. A master agreement between OCTA, Caltrans and state and federal resource agencies was executed in January 2010. This offers higher-value environmental benefits such as habitat protection, connectivity and resource preservation in exchange for streamlined project approvals for all OC Go, formerly known as Measure M, freeway projects.

**LAND PRESERVATION**

The Mitigation Program allocated funds to acquire land and restore habitat. Properties are acquired and permanently protected as conservation lands (Preserves). Funded habitat restoration projects restore existing conservation lands to their native state.

OCTA has acquired more than 1,300 acres of Preserves in Brea, Laguna Beach, Silverado Canyon, and Trabuco Canyon. A total of 12 restoration projects have been funded throughout Orange County. Approximately \$30 million has been spent on acquisitions and \$10 million on over 350 acres of habitat restoration activities.

**CONSERVATION PLAN**

In 2017, OCTA completed the Final Natural Community Conservation Plan/Habitat Conservation Plan (Conservation Plan), which is a state and federal process to protect threatened and endangered species. The Conservation Plan ensures OCTA's wilderness preserves will remain forever protected from development. It also requires OCTA to provide funding for the long term management of the properties.

**RESOURCE MANAGEMENT PLANS**

In conjunction with the Conservation Plan, Resource Management Plans (RMP) were developed for each acquired Preserve. These plans outline how the Preserves are protected, how they will be managed, and also address fire protection.

The RMPs will be reviewed at least every five years and updated as necessary to prioritize management actions based on the changing Preserve needs. At that time, the RMPs would be presented for public review.





Orange County Transportation Authority  
 650 S. Main Street  
 P.O. Box 14184  
 Orange, CA 92663-1684  
 (714) 660-OCTA  
[www.octa.net](http://www.octa.net)

**Agenda Item # – Presentation from Riverside Conservation Authority (RCA) Western Riverside County Multiple Species Habitat Conservation Plan**



## **Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP)**

The Western Riverside County Regional Conservation Authority (RCA) formed in 2004 to achieve one of America’s most ambitious environmental efforts, the **Riverside County Multiple Species Habitat Conservation Plan (MSHCP)**. Our mission is to establish a 500,000-acre habitat reserve to protect, restore, and enhance habitats for the conservation of 146 species while expediting construction of needed infrastructure, particularly transportation, and providing certainty in the development process. As the nation’s largest habitat conservation plan, the MSHCP strengthens the sustainability and quality of life in Western Riverside County by alleviating traffic congestion, protecting natural resources and improving air quality. The MSHCP provides Endangered Species Act coverage under a single permit for critical wildlife areas, which helps accelerate the construction of freeway and road projects by as much as five years. **Acquiring reserve lands is RCA’s core activity. RCA also:**

- Manages the lands it acquires to ensure animals and plants thrive
- Monitors “habitat loss” and the behavior and welfare of protected plants and animals
- Reviews applications for infrastructure or development projects
- Publishes an annual report.

Local Development Mitigation Fees (LDMF) and other funding sources (tipping fees, public project and participating special entity fees) pay for RCA’s core activities.

**The Western Riverside County Regional Conservation Authority (RCA)  
manages the largest habitat conservation plan in the nation by:**



*Environmental permits held by the RCA have helped improve Riverside County transportation by expediting freeway and road projects by as many as five years, saving taxpayers.*



# HABITAT CONSERVATION & INTEGRATED PLANNING IN WESTERN RIVERSIDE COUNTY

SCAG Regional Advanced Mitigation Program  
Advisory Task Group

January 28, 2022

*Aaron Hake*

*Interim Regional Conservation Deputy Executive Director*



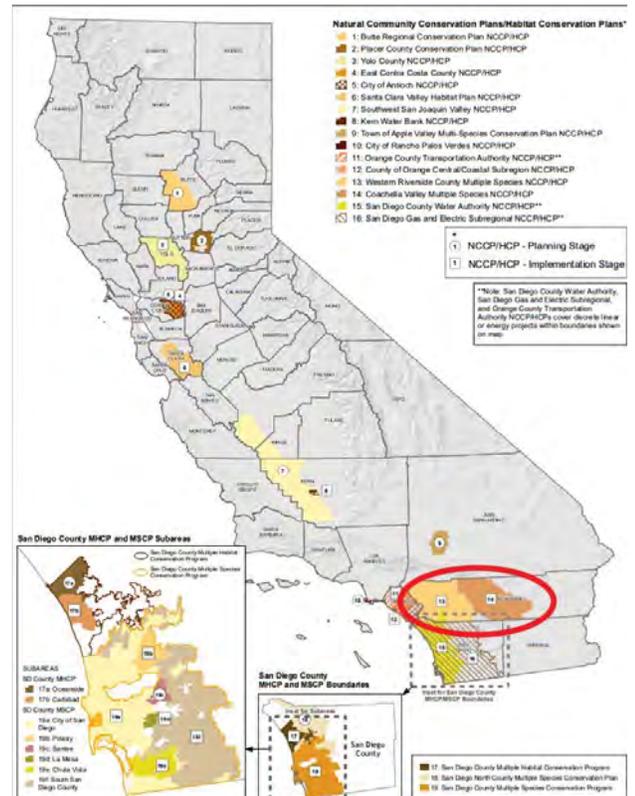
What if there was a proactive strategy to streamline infrastructure and housing projects, while protecting biodiversity and natural lands?



What if → What is



# California's Natural Community Conservation Plans (NCCP)





## Above and Beyond

- Largest Coverage Area and Most Species Protected
- Compliance Tied to Local Transportation Dollars
- Federal and State Governments are Signatories



## Project Delivery





Demonstration:

[RCA MSHCP  
Information Map](#)



Learn More

[www.wrc-rca.org](http://www.wrc-rca.org)

@WesternRCA



**Agenda Item # - Summary of feedback shared from interviews with County Transportation Commissions and transportation providers on SCAG’s upcoming Regional Advanced Mitigation Program**

To promote the conservation of natural and agricultural lands and restoration of habitats, SCAG’s 2020 Regional Transportation Plan/Sustainable Communities Strategy (“Connect SoCal 2020”) includes a new Regional Advance Mitigation Program (RAMP) initiative that aims to establish or supplement regional advanced mitigation programs and other approaches to more effectively address impacts for projects that support reduction of per-capita vehicle miles traveled. The initiative could also provide resource support for local agency’s long-term management and stewardship of mitigated properties.

Potential Goals of RAMP include:

- *Expediting project delivery and achieving meaningful conservation outcomes;*
- *Saving time, money, and staff resources;*
- *Encouraging agency communication; and*
- *Helping resource and transportation agencies achieve more efficient mitigation that aligned with CTC and SCAG goals.*

As part of the RAMP development process, members of the SoCal Greenprint project team met with County Transportation Commission (CTC) staff from across the region from April through December 2021 to gather initial feedback on the potential program needs and benefits.

<b>County Transportation Commission</b>	<b>CTC Staff in Attendance</b>	<b>Interview Date</b>
Ventura County Transportation Commission (VCTC)	Amanda Fagan	4/20/2021
Orange County Transportation Authority (OCTA)	Kia Mortazavi, Dan Phu, Lesley Hill	7/2/2021
San Bernardino County Transportation Authority (SBCTA)	Josh Lee, Steve Smith	7/22/2021
Riverside County Transportation Commission (RCTC)	Aaron Hake, Tricia Campbell	8/17/2021
Los Angeles County Metropolitan Transportation Authority (LA Metro)	Heather Repenning, Paul Backstrom, Carlos Montez	11/30/2021
Imperial County Transportation Commission (ICTC)	David Aguirre	12/9/2021

Key takeaways and concerns across six interviews with each CTC included:

- RAMP could assist in meeting **data gaps, establish opportunities to provide input on land use,** and provide an **opportunity to share data** with corresponding local jurisdictions;
- **Overall support of a RAMP program,** especially when undertaken at a regional scale by SCAG
- RAMP provides an opportunity to **enhance cross-jurisdictional and cross-county collaboration** (e.g., trade and border activity);
- **Encouraged continued collaboration between SCAG and CTCs** to address mitigation on both a project-by-project basis and at a county scale;
- Interest in SCAG hosting a program for **advanced mitigation,** particularly providing incentives for advance mitigation (e.g., expediting transportation programs, advancing support for sales tax measures);
- Interest in the **RAMP Mitigation Wizard tool that can provide solutions for reducing the impacts of projects** and increasing overall views of the SoCal Greenprint as a valuable data tool;
- RAMP could be a source of valuable information at a region scale but may hold a **gap in direct application to local conditions;** and
- Expressed **concerns about duplication and/or conflicting mitigation efforts between regional, county, and local approaches** to mitigation, as well as potential concerns about sales tax linking to Natural Community Conservation Planning (NCCP) as a result of RAMP.
  - CTCs provided the following recommendations to help inform the RAMP framework:
- Broaden the framing of RAMP to be **valuable across multiple sectors,** rather than leading with a transportation focus;
- **Provide a menu of mitigation options** and approaches for each county, rather than a one-size-fits-all approach, as specific project needs differ across the region and within each county;
- **Incorporate an analysis of future mitigation needs** into RAMP;
- Engagement with the California Coastal Commission, US Army Corps of Engineers, and Water Board to **incorporate a focus on water resources in addition to biological resources;** and
- **Transparent engagement** with CTCs, partner agencies, and communities throughout RAMP development, including utility agencies.

In addition to interviewing CTCs across the SCAG region, SCAG staff engaged with partner transportation agencies with experience in mitigation.

Transportation Provider(s)	Staff in Attendance	Interview Date
Land Veritas	Marlene Tyner-Valencourt	4/13/21
Caltrans, Districts 7 and 8	Francis Appiah (D7), Tracey D'Aoust Roberts (D8); Craig Wentworth (D8)	9/9/21; 9/16/21
Brightline High Speed Rail Project	Andy Mack	9/16/21

Key feedback from transportation providers included:

- **Help bring private and public agencies and entities together towards a common goal**

- **Increase public awareness of environmental resources**, as well as how to improve and protect resources
- Recommend engaging with regulatory agencies early in the RAMNA process to ensure the process captures an agency's goals
- Expressed general support of a **multi-county approach, especially when collaborating across Caltrans Districts for development of multi-species regional plans**
- Expressed interest in **development of a credit system which could provide consistency across management of multiple mitigation banks**
- Expressed interested in **collaborating on advance mitigation, specifically multi-agency advance mitigation projects**