



January 31, 2023

Sent via email to: ePublicComment@scag.ca.gov

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

RE: Adoption of the Regional Advance Mitigation Program Policy Framework (SUPPORT)

Dear President Harnik,

The Morongo Basin Conservation Association is broadly in support of the policy framework for the Regional Advanced Mitigation Program (RAMP), as was unanimously recommended by the Energy and Environment Committee of SCAG. We also wholly support the inclusion of an environmental non-profit representative on the Technical Advisory Committee (TAC), as was included in the motion. We recognize the imperative of a thoughtful data-driven future for regional planning and the incorporation of a comprehensive mitigation program that would streamline permitting to support our region's healthy future. Further, implementation of the RAMP begins the required steps of meeting the SCAG mitigation measures adopted in the 2020 Connect SoCal Program Environmental Impact Report.

By way of background, The Morongo Basin Conservation Association's mission statement is:

*To advocate for the Healthy Desert that
nurtures our rural life, cultural wealth and
economic well-being.*

Our geographic scope and area of focus includes the Morongo Basin, and the Desert Environment of San Bernardino and Riverside counties.

Our organization has particular interest in protection of the intact desert ecosystem that supports species diversity. The intact desert contributes to the health of the planet through the already sequestered, and on-going sequestration of carbon. We support the implementation of a renewable distributed electrical system within the built environment that will provide resiliency and self-sufficiency as a part of a carbon free power grid. We are committed to finding solutions to our area's housing crisis as a component of our economic well-being. Our comments include the following points:

- One of the biggest costs and challenges to housing development projects is permitting, jurisdictional staff time spent reviewing individual project proposals, time, and CEQA environmental reviews. RAMPs streamline permitting and

environmental review, thereby reducing staff costs and the overall cost of developing.

- Some claim a conflict exists between California's need for housing and the preservation of our natural open spaces. Additionally, some say that consuming more natural lands is necessary if we are going to build housing units which middle class working people can afford. This is a false dichotomy and represents outdated ideas.
- Connect SoCal's PEIR also includes required mitigation measures for establishing a RAMP planning initiative, which state that SCAG will support advance mitigation efforts in the region (SMM AG-2) and provide easily accessible resources to help municipalities, conservation groups, developers and researchers prioritize lands for conservation (SMM BIO-2).
- RAMPs focus on improving conservation outcomes, while simultaneously delivering transportation projects. Native plants, local wildlife, plus water and air quality all benefit from more thoughtful planning and more meaningful mitigation.
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- There is great potential for multi-benefit outcomes that address the biodiversity crisis (like species protection) while also directly benefiting people (like improving access and equity to nature). Another example is that protecting habitat helps alleviate the drought by protecting water supply, allowing for groundwater recharge, and stabilizing the health of the aquifer.
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- Part of the reason Connect SoCal is widely supported is because it includes ways to meet the regional greenhouse gas emission and vehicle miles traveled reduction goals set by the State through AB 32 (the Global Warming Solutions Act of 2006) and SB 375 (the Sustainable Communities Planning Act of 2008). Conservation is one tool to reduce both by directing development to appropriate city-centered locations. We cannot build our way to a better climate and increased resiliency, but we can conserve our way to it.

Thank you for the opportunity to comment on this upcoming agenda item.

Sincerely,



Steve Bardwell, President
Morongo Basin Conservation Association

***Post Office Box 24, Joshua Tree CA 92252 – www.mbconservation.org
MBCA is a 501(c)3 non-profit, community based, all volunteer organization***