

July 6, 2021

Adam Livingston
Director of Planning and Policy
Sequoia Riverlands Trust
427 S Garden Street
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RE: Draft Action Element for 2022 Regional Transportation Plan / Sustainable Communities Strategy

Mr. Livingston:

Fresno COG has received and thanks Sequoia Riverlands Trust for its June 17, 2021 letter addressing the 2022 RTP/SCS Draft Action Element Outline. Respectfully, Fresno COG offers the following responses to the comments raised in the letter.

Comment 1:

... we are pleased to see that the Draft Action Element includes a policy-level commitment to “[s]upport local jurisdictions’ efforts to minimize the loss of farmland, environmentally sensitive areas, and natural resources,” but we believe that the action items for Goal #2 should provide more clarity as to how this policy will be implemented. The sixth action item in this list includes pursuing funding for projects consistent with the SCS, and goes on to state “Example: Prioritize projects through the RTP project evaluation criteria that support these goals and policies.” This action item could be strengthened by committing to incorporate conservation of habitat, agricultural land and other natural resources into the project selection process. One of Fresno COG’s neighboring MPOs, for example, has a points-based system for scoring highway projects, with points awarded for minimizing impacts on rare or endangered species, and “minimiz[ing] disruption to natural beauty.” If projects that avoid impacts to natural and working lands (ideally including active transportation and other non-highway investments) are more likely to be funded than those that do not, this incentive will support local jurisdictions’ efforts to conserve these resources.

Response 1:

Thank you for your comment. Fresno COG integrates conservation of natural resources into the project selection for relevant programs, such as incentivizing projects that minimize prime farmland losses, unique farmland, farmland of statewide importance and farmland of local importance in the Surface Transportation Block Grant Program. Additionally, Fresno COG uses farmland and natural resources as constraints to development in the Sustainable Communities Strategy (SCS) land use modeling. However, through discussions with local agency staff during the development of the 2018 RTP/SCS as well as the 2022 RTP/SCS, it was determined that at the time of local agency project submission to be included in the RTP, environmental clearance and

engineering has not been completed on the project. Therefore, it is infeasible for projects to determine their specific impacts on natural resources and the environment.

Comment 2:

We would also recommend that the Fresno Council of Governments continue to use San Joaquin Valley Greenprint layers as constraints for new development in its land use scenario, and begin to mandate 1:1 farmland mitigation for RTP projects. Whether included in the Action Element or outlined elsewhere in the RTP/SCS, these best practices can provide meaningful support for “efforts to minimize the loss of farmland, environmentally sensitive areas, and natural resources,” helping to translate this aspiration into a reality on the ground.

Response 2:

Thank you for your support of the use of the SJV Greenprint layers as constraints for new development in our land use scenario. While we are able to use farmland and natural resources as constraints in the SCS land use development modeling, Fresno COG is unable to mandate 1:1 farmland mitigation for its RTP projects. As mentioned in the above response, this type of information is not typically available for transportation projects at the time of their submittal to the RTP. Whenever possible, Fresno COG provides support to our local jurisdictions in their natural resource conservation efforts. This support includes valleywide efforts, such as the SJV Greenprint, SJV Blueprint, providing GIS support with regard to important farmland, and staying abreast of other relevant regulations, such as the Sustainable Groundwater Management Act.

Thank you for your comments on the Draft Action Element Outline and we look forward to continuing to work with you throughout the development process of the 2022 RTP/SCS. Please feel free to contact me at jsoliz@fresnocog.org should you have any further questions or comments.

Sincerely,

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