

Policy Advisory Committee RTP Policy Discussions

- **Policy Issues proposed by City of Fresno**
- **Responses from County of Fresno**
- **Revised Policy Statement Proposal – City of Fresno with County of Fresno response – November 21, 2013**

City

Barbara Steck

From: Barbara Steck
Sent: Tuesday, October 22, 2013 10:48 AM
To: 'Bernard Jimenez (bjimenez@co.fresno.ca.us)'; 'Brian Haddix (bhaddix@ci.sanger.ca.us)'; 'Bruce Rudd'; 'Cruz Ramos'; 'David Elias'; 'DB Heusser'; 'Don F. Pauley'; 'Donald Pauley'; 'Encarnacion "Shun" Patlan (spatlan@parlier.ca.us)'; 'Gerald Forde'; 'Ken McDonald'; 'Luis Patlan (Kerman)'; 'Nicole R. Zieba (nicole.zieba@reedley.ca.gov)'; 'Rene Ramirez (rramirez@coalinga.com)'; 'Rob Woolley'; 'Samuel Escobar (samescobar@cityoforangecove.com)'; 'Sue Bauch (Kingsburg)'
Cc: Tony Boren
Subject: FW: SCS Discussion

Good Morning City Managers – Bruce Rudd has asked that I forward his email to you prior to tomorrow's workshop with the school districts and LAFCo. Please note that I have edited the highlighted numbers to include both Millerton and Friant Ranch estimates.

I have discussed the email with PAC chair Rob Woolley and have decided to include the item on the November PAC agenda as it is really a member agency issue rather than a school district/LAFCo issue.

Hope to see you tomorrow at the workshop.

Thanks.

Barbara

Barbara J. Steck, AICP
Deputy Director



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From: Bruce Rudd [<mailto:Bruce.Rudd@fresno.gov>]
Sent: Friday, October 18, 2013 2:58 PM
To: Barbara Steck
Cc: Rob Woolley
Subject: SCS Discussion

Barbara,

As you recall, I have recommended that the City Managers provide a policy framework that would be considered as part of the SCS planning efforts and subsequent approval. I feel that including the following policies will help to clarify how the region is able to meet its obligations

ajm

under SB375 and prioritize where future transportation investments should be made. In anticipation of our meeting scheduled for October, 23, 2013 at 10:00 a.m, I am providing the following policy considerations that would be adopted by the CFCOG Board when they vote on a preferred alternative.

- That if it wasn't for the City of Fresno's Alternative A General Plan Update, including the implementation of Bus Rapid Transit, that Fresno County could not meet GHG target reductions. Therefore, the SCS should not embrace nor prioritize growth that undermines the ability for the City to effectively implement Alternative A.
- When it comes to growth in unincorporated areas, there is a recognition that "legacy" communities play a key role in supporting production agriculture and that the County should prioritize funds to study options for addressing water and sewer infrastructure challenges in unincorporated legacy communities rather than in "new towns".
- No regional transportation funds should go to support transportation projects that serve new towns. Instead, dollars should be prioritized to meet the needs of existing cities and communities.
- The County has expressed an interest in studying the development of the Friant Corridor, although the area that is proposed is not included in any of the SCS scenarios. Therefore, the Friant Corridor should not be the focal point of any new development under the SCS.
- A recognition that there are 6,725 units already entitled in Friant Ranch and Millerton/New Town but recommend the number of future units and population estimates be capped at ~~1,500~~ 2800 units and ~~5,100~~ 9600 people as identified in Scenario B of the SCS.

I would appreciate it if you would distribute this to the PAC members in advance of Wednesday's meeting.

Thanks and have a good weekend.

County

County of Fresno's Response to Proposed City of Fresno's
Regional Transportation Plan Policies
November 8, 2013

- A. **That if it wasn't for the City of Fresno's Alternative A General Plan Update, including the implementation of Bus Rapid Transit, that Fresno County could not meet GHG target reductions. Therefore, the SCS should not embrace nor prioritize growth that undermines the ability for the City to effectively implement Alternative A.**

As we have expressed in the past, the County continues to support the City of Fresno in its ongoing General Plan Update process. However, it does appear that the City is of the opinion that if it were not for the City's Alternative "A", the Fresno County region could not meet its GHG reduction targets. The County respectfully notes that although the City's Alternative "A" assumption plays a major role in meeting the GHG reduction targets, it is not the only contributor in this effort and that other cities and the County, when considered jointly, achieve the GHG reduction targets. The SCS process and outcome is reflective of all jurisdictions.

In addition, this proposed policy is concerning to the County and should be concerning to the 14 cities as well. It would appear, from the County staff perspective, that the City is recommending that future growth, whether it occurs in the unincorporated area or the other cities should not be embraced or supported if it undermines the City of Fresno's growth plans. This position appears to be articulated in the City's November 2012, Draft Urban Form, Land Use, and Design document prepared for its current General Plan Update, as following:

"Emphasize the City as a role model for growth management planning, regional cooperation, collaborative planning, efficient processing and permit streamlining, public-private partnership and share financing, sustainable urban development policies, environmental quality, and a strong economy, and work with other jurisdictions and institutions to further these values throughout the region.

Positively influence the same attributes in other jurisdictions of the San Joaquin Valley - and thus the potential for regional sustainability - and improve the standing and credibility of the City to pursue appropriate State, LAFCO, and other regional policies that would curb sprawl and prevent new unincorporated community development which compete with and threaten the success of sustainable policies and development practices in Fresno."

Policy LU-10-b **Integrity of the General Plan.** Discourage development by neighboring jurisdictions that compromises the integrity and implementation of the General Plan.

It is County staff's position that the above policies communicate the City's fundamental approach to oppose all planning and development efforts that do not align with the City's view of land use planning and development. It is the County's understanding that some partner cities are considering or have initiated general plan updates that are not currently reflected in any of the SCS assumptions. Based on the City's proposed policies, these planning efforts would likely "undermine" the City's ability to implement Alternative "A" and should not be "embraced". Please note that it is the County's fundamental position that all cities and unincorporated communities in the County should accommodate reasonable growth in order to be self-sustaining.

County

Finally, the long-standing land use policies of the Fresno County General Plan that direct urban growth to existing cities and unincorporated communities is a significant contributing factor to the region's ability to meet the GHG reduction targets.

- B. When it comes to growth in unincorporated areas, there is a recognition that "legacy" communities play a key role in supporting production agriculture and that the County should prioritize funds to study options for addressing water and sewer infrastructure challenges in unincorporated legacy communities rather than in "new towns".**

The County's unincorporated communities, whether defined as "legacy" pursuant to GC Section 65302.10(a) or not, do significantly more than simply support the County's agriculture economy. It is important that the City recognize and acknowledge that these communities provide a full range of community services and employment opportunities similar to small incorporated cities and offer an alternative for residents who desire not to live in a metropolitan area. While the County applauds the City for recognizing the inefficiencies of developing beyond its urban core, the fact remains that the County is not studying development of "new towns", and that development occurring and planned within the Friant/Millerton area is occurring within existing planned communities that are required to mitigate and pay their proportion share of impacts relating to traffic, water, sewer, air quality, etc.

- C. No regional transportation funds should go to support transportation projects that serve new towns. Instead, dollars should be prioritized to meet the needs of existing cities and communities.**

As noted in my email of October 23, 2013, the County is not seeking any transportation dollars for roads serving either the Friant Ranch or Millerton Specific Plan developments. While Millerton Road is listed as Tier II Rural Road project in Measure C, improvements to Millerton Road are necessary to address existing deficiencies, not development associated with Millerton Specific Plan. Friant Road, which will serve the Friant Ranch development, is completely built-out and other developments in the Friant/Millerton area are paying road impact mitigation fees for their proportionate share of road impacts. In addition, all local roads serving these developments are or will be included in a County Service Area and maintenance will be paid for by residents who live within those developments.

- D. The County has expressed an interest in studying the development of the Friant Corridor, although the area that is proposed is not included in any of the SCS scenarios. Therefore, the Friant Corridor should not be the focal point of any new development under the SCS.**

Background - on May 21, 2013, the County Board of Supervisors (Board) directed staff to move forward with the proposed Friant Corridor Study (Study) which will include a feasibility analysis of the corridor that would assess assets, constraints, opportunities, or incentives to future land uses relating to recreation, resource and cultural awareness and conservation, tourism, and supportive commercial uses. The Study is the initial step and is intended to provide a framework for the Board to determine if further and formal planning is warranted and/or desired. The Board further directed that work on the Study will not occur until the estimated \$120,000 necessary to complete the Study is collected from the community sector (private and/or public). To date, approximately \$91,000 has been collected. The County is not recommending that the Friant Corridor be a focal point of any new development under the SCS.

County

- E. A recognition that there are 6,725 units already entitled in Friant Ranch and Millerton/New Town but recommend the number of future units and population estimates be capped at ~~1,500~~ 2800 units and ~~5,100~~ 9600 people as identified in Scenario B of the SCS.**

As indicated above, developments in Friant Ranch/Millerton Specific Plan are approved within existing communities. Moreover, specific development projects are being constructed today and/or are proposed based on approved planning and environmental documents. The County requests clarification of this issue in that it appears that the City is suggesting that existing entitled and/or planned developments be ignored. The County is unsure as to the logic/basis for this recommendation. In development of growth scenarios by Fresno COG, there has been no limitation placed on the number of residential units in any jurisdiction. To achieve the GHG reduction targets by capping the number of residential units in any jurisdiction is not a practical assumption. Furthermore, the City's position appears incongruent in light of its Southeast Growth Area (SEGA). The City's position to reduce and cap the units/population in the Friant Ranch/Millerton area is no different than if the County were to suggest that the City move forward with the removal of SEGA from the current Sphere of Influence given the fact that it is not within the current city limit boundaries and the City has expressed its intention not to develop SEGA for 20 to 50 years.

The County does not support the proposed policies presented by the City of Fresno and they should not be considered as part of the RTP process. Rather, the County strongly desires and supports continuing current efforts of cooperation through ongoing, meaningful discussion and collaboration amongst all cities in order to facilitate coordinated planning efforts that will benefit all residents of Fresno County.

However, if there remains interest in adopting the proposed policies, the County recommends adopting the following additional policies as follows:

- F. If the City of Fresno fails to adopt the current version of Alternative "A" as part of its General Plan Update process, the City's proposed policies listed above shall not apply to the current RTP.
- G. The City of Fresno shall submit, for COG's approval, a General Plan Financing and Implementation Program (Program) demonstrating how the City will implement and finance its General Plan. The Program shall include implementation and financing milestones that correspond to the RTP planning period, and the Program shall be submitted to COG within 90 days following the City's adoption of its General Plan Update.
- H. If the City of Fresno receives transportation funding and does not meet its obligations pursuant to G. above, the City shall reimburse COG for all funding received.

city/county

Barbara Steck

From: Jimenez, Bernard <BJimenez@co.fresno.ca.us>
Sent: Thursday, November 21, 2013 1:37 PM
To: bhaddix@ci.sanger.ca.us; Bruce Rudd (Bruce.Rudd@fresno.gov); cruzramos@sebastiancorp.net; 'David Elias' (delias@ci.fowler.ca.us); DBH@cityofselma.com; 'Donald Pauley' (dfpauley@gmail.com); 'Encarnacion "Shun" Patlan' (spatlan@parlier.ca.us); gforde415@yahoo.com; citymanager@ci.firebaugh.ca.us; Luis Patlan (LPatlan@cityofkerman.org); Nicole.zieba@reedley.ca.gov; 'Rene Ramirez' (rramirez@coalinga.com); robw@cityofclovis.com; samescobar@cityoforangecove.com; 'Sue Bauch (Kingsburg)' (sbauch@cityofkingsburg-ca.gov); doralee_carter@dot.ca.gov; 'Amarpreet Dhaliwal' (amarpreet_2000@yahoo.com); bertha@parlier.ca.us; ashley.swearengin@fresno.gov; cheryl.burns@fresno.gov; chet@payality.com; Jeannie Davis (jdavis@ci.fowler.ca.us); davidtcardenas@yahoo.com; gabriel@cityoforangecove.com; Perea, Henry; jacquiep@cityofclovis.com; Kelley, Janelle; jmitchell@ci.sanger.ca.us; joshau@westernlandscapedev.com; mayor@cityofselma.com; Briggs, Kevin; lynnea@cityofclovis.com; kscow@hospitalcouncil.net; lashbeck@hospitalcouncil.net; deputyclerk@ci.firebaugh.ca.us; rlander@coalinga.com; mr4kingsburg@gmail.com; Nathan Magsig (NathanM@ci.clovis.ca.us); rsoleno@reedley.ca.gov; bhernandez@ci.sanger.ca.us; rbeck@reedley.ca.gov; rsilva@ci.mendota.ca.us; RNG17@mail.fresnostate.edu; cjohnson@coalinga.com; admasst@cityofhuron.com; svchavez1@yahoo.com
Cc: Navarrette, John; Weaver, Alan; Kettler, William; Khorsand, Mohammad; Barbara Steck; Tony Boren
Subject: RE: SCS Discussion

Greetings all. The County appreciates the City of Fresno's revised policies as they now appear to focus more on regional collaboration rather than specific development projects. However, receiving this new proposal at such a late date raises significant questions and concerns as to whether action should be delayed in order to fully evaluate. The City's original proposal, which was responded to by the County and is included in tonight's COG Policy Board agenda packet, should continue to be included as we move forward in this process. While the County did not agree with the majority of the City's original proposal, they, when considered jointly with the County's proposal, provide a significant framework for continued discussions. In addition, and equally important, both City and County proposals were considered and discussed by the PAC who unanimously voted to recommend support of Scenario "B", and further discuss both City and County proposals as part of the next RTP Update. To discard them now, could significantly undermine the positive momentum that has been generated.

If the City's latest polices are to be considered, they should be added to the City's and County's proposals as recommended by the PAC, and be discussed as part of the next RTP Update. This would allow adequate time to review and provide for comprehensive discussion and deliberation of all issues raised to date. In addition, the County offers the following modifications to the City's latest proposal as noted below. These modifications reflect the importance and communicate clearly that COG is not a regional land use agency. COG's primary functions are transportation planning and programming. This distinction is critical and should be kept at the forefront as we move forward. Please let me know if you have any questions. Thanks.

**Bernard Jimenez, Deputy Director of Planning
Public Works and Planning
Ph: (559) 600-4234**

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Public Works and Planning is continuing to work to improve customer services provided by the Department. Your feedback on how we are doing would be greatly appreciated. Please take a few minutes to complete our short Customer Service Survey at the following link: [Short Customer Service Survey](#)

Thank you.

From: Navarrette, John
Sent: Wednesday, November 20, 2013 1:21 PM
To: Jimenez, Bernard
Subject: Fwd: SCS Discussion

Sent from my iPad

Begin forwarded message:

From: Bruce Rudd <Bruce.Rudd@fresno.gov>
Date: November 20, 2013 at 12:45:09 PM PST
To: Barbara Steck <bjsteck@fresnocog.org>, "Brian Haddix (bhaddix@ci.sanger.ca.us)" <bhaddix@ci.sanger.ca.us>, Bruce Rudd <Bruce.Rudd@fresno.gov>, Cruz Ramos <cruzramos@sebastiancorp.net>, "David Elias" <delias@ci.fowler.ca.us>, "DB Heusser" <DBH@cityofselma.com>, "Don F. Pauley" <dfpauley@cityofmendota.com>, Donald Pauley <dfpauley@gmail.com>, "Encarnacion \"Shun\" Patlan (spatlan@parlier.ca.us)" <spatlan@parlier.ca.us>, Gerald Forde <gforde415@yahoo.com>, "Ken McDonald" <citymanager@ci.firebaugh.ca.us>, "Luis Patlan (Kerman)" <lpatlan@cityofkerman.org>, "Nicole R. Zieba (nicole.zieba@reedley.ca.gov)" <nicole.zieba@reedley.ca.gov>, "Rene Ramirez (rramirez@coalinga.com)" <rramirez@coalinga.com>, Rob Woolley <robw@cityofclovis.com>, "Samuel Escobar (samescobar@cityoforangecove.com)" <samescobar@cityoforangecove.com>, "Sue Bauch (Kingsburg)" <sbauch@cityofkingsburg-ca.gov>
Cc: Tony Boren <tboren@fresnocog.org>, "Weaver, Alan" <aweaver@co.fresno.ca.us>, "Kettler, William" <WKettler@co.fresno.ca.us>, "Navarrette, John" <jnavarrette@co.fresno.ca.us>
Subject: SCS Discussion

Good afternoon,

Wanted to provide all of you with a revised policy statement that Mayor Swearengin will be proposing at tomorrow night's SCS discussion. The Mayor and I have met with Rob Wooley, Clovis City Manager and Mayor Ashbeck to come up with language that is more generic than previously discussed, but seems to be consistent with what we discussed at the PAC last Friday. Mayor Swearengin is very supportive and encouraged by the PAC's commitment to help lead the discussion with regard to land use planning and future transportation investments.

In compliance with California's SB375, the Board of Directors of the Fresno county Council of Governments (COG) recommends adopting **Scenario B** for its preferred Sustainable Communities Strategy. Scenario B accomplishes the following:

- Maintains consistency with current planning assumptions made by the member agencies;
- Allocates growth according to historical trends;
- Reduces green house gas emissions by 7.86% by 2020 and 11.32% by 2035;
- Balances increased densities with traditional growth patterns;
- Improves Transit Oriented Development by 21.3%; and
- Reduces consumption of important farmland by almost 90%.

In addition, the COG Board wishes to direct the PAC to continue the meaningful discussions that have begun with stakeholders that include LAFCo, school districts, CBOs, and other interested parties that will provide guidance for the implementation of the COG's transportation program, regional **transportation** planning, ~~growth~~, and future SB 375 initiatives utilizing the following policy statements as guidance. The COG Board wishes to direct the PAC to evaluate the following policy statements and others suggested by stakeholders and bring back recommendations to the COG Board for final adoption as **part of the next Regional Transportation Plan Update**.

1. SB 375 provides the COG Policy Board, PAC and TAC with the opportunity to engage in meaningful policy discussions about regional **transportation** planning, ~~growth~~ and future SB 375 implementation.
2. The COG Policy Board recognizes the importance of engaging a wide range of community organizations in the review and development of **the Regional Transportation Plan SB-375 plans and jurisdictional land use plans**.
3. Scenario B depends on the passage and implementation of each local jurisdiction's current planning assumptions. The COG Policy Board affirms the importance of each local jurisdiction's **land use authority, and land use plans** that are the basis of Scenario B and urges their adoption and full implementation at the local level.
4. The COG Policy Board prioritizes the usage of regional transportation funds to meet the priorities identified by existing cities **and the County**. ~~/communities and to leverage existing transportation plans already approved by voters and jurisdictions.~~
5. The COG Policy Board recognizes the wide range of challenges facing ~~the 'legacy'~~ all communities **and cities** in Fresno County, ranging from **employment opportunities, access to health services, housing, revenues, sewer, water, transportation and other public infrastructure** needs. As a region, we are fully committed to supporting **all these communities and cities** in ensuring **the sustainability of their future**.

Thanks

RTP Policy Recommendations

Submitted by

Coalition of Community Based Organizations

1. Proposed Sustainable Planning and Infrastructure Program
2. Needs Assessment
3. Natural and Working Lands Conservation Policy

To: Fresno COG Regional Transportation Plan Roundtable

Date: August 12, 2013

Re: Proposed Sustainable Planning and Infrastructure Program

Recommended action from RTP Roundtable: Provide feedback and guidance. Direct Fresno Council of Governments staff to work with project proponents to further develop the proposal and return for a committee vote in September.

Purpose of Sustainable Planning and Infrastructure Program:

Support the implementation of the Fresno Sustainable Communities Strategy (SCS) by enhancing the ability of existing neighborhoods to serve as walkable, bikeable, transit-oriented or transit-ready areas for people of all incomes via funding the development of necessary plans, projects and programs.

Program description:

This program will pool transportation funds to be distributed through a competitive grant process on a 2-year cycle during the life of the 2014 RTP. Projects will be scored based on their ability to advance the health, equity, air quality and sustainability goals of SB375 as well as their impact on equity and the community. To receive maximum points a project should be part of a comprehensive effort to identify or enhance existing neighborhoods to serve as inclusive, mixed use places where people of all incomes can safely and conveniently meet many of their daily needs via transit, walking and biking. Monies can fully fund a project or provide the local match component of a larger effort.

Eligible entities:

All FCOG member jurisdictions, Fresno County governmental institutions, and nonprofit organizations.

Location:

Project must be in existing, established communities in Fresno County. For incorporated cities and towns, they must be within the existing city limits. For unincorporated communities, they must be within existing boundaries. For the City of Fresno, eligible proposals must be for neighborhoods and areas not currently prioritized in the Measure C Transit Oriented Development Program, while that program remains focused on the City of Fresno.

Eligible Projects:

1. Feasibility studies that look at public transit readiness, public transit alternatives and improvements, safe routes to school and bus stops, and infrastructure investments to promote safe walking and biking.
2. Engineering, design and CEQA related processes for sustainable planning efforts and implementation.
3. Upgrades to and/or new capital infrastructure in existing communities and neighborhoods (e.g., sidewalks, curb and gutter, bus shelters, bike lanes, bicycle and pedestrian safety measures, street lighting and pedestrian amenities, complete streets).
4. Community and neighborhood plans, to identify opportunities and assets to enhance existing areas into walkable, bikeable, transit-ready neighborhoods affordable to people of all incomes that will reduce VMT and contribute to GHG reduction efforts (e.g., bicycle plans, form based code, opportunity sites, climate

action plans, neighborhood stabilization or affordable housing preservation plans that go beyond state Housing Element requirements).

5. Public transit subsidies in the form of subsidies to transit providers and / or bus passes for low income individuals.

6. Incentives (e.g., permit fee reductions) for infill, mixed use or transit-oriented development projects that will make a significant contribution to implementing the SCS and make existing neighborhoods more walkable, transit-ready, inclusive, and sustainable. Incentives should support exceptional projects that advance smart growth principles and strategies for healthy, equitable development (e.g., density, a mix of housing types, reduced parking requirements, affordable housing and jobs-housing fit, anti-displacement policies, access to healthy food, reduced exposure to pollution from high-volume roadways).

Disadvantaged community set-aside:

35% of all available funds must go towards projects in disadvantaged communities defined as those communities that either have a median household income at or below 60% of the statewide median household income or are communities identified as disadvantaged by CalEnviroScreen (top 10%). If there are insufficient amount of applications, available funds must be returned to the general Sustainable Planning and Infrastructure Program pool.

Needs Assessment

In a step towards region wide sustainability and improved public health, we request that Fresno COG partner with member jurisdictions, government agencies (*e.g.* Fresno County Public Health), non-profit organizations, and interested stakeholders to evaluate existing needs in Fresno's disadvantaged communities. This can be done through a needs assessment database of existing built environment conditions and current health status in low income communities. Low income communities have considerably higher negative health outcomes and typically have significant unmet needs related to their built environment, often lacking paved roads, sidewalks, adequate transit, access to basic services, safe drinking water, affordable housing, wastewater services, and access to health care services.

The needs assessment database can be used to develop strategies to address disparities via smart growth planning and transit investments. FCOG can utilize data to inform scenario modeling, goals, objectives, and policies and action programs that, if implemented correctly, will improve conditions over time. The database can also be used to shape financial investments and ensure that resources are reaching the communities most in need. In partnership with member agencies, FCOG would analyze needs and then identify funding sources and financing mechanisms that local governments can utilize for planning, building, and maintaining infrastructure. The database can then be used to track progress towards addressing these needs over time and inform any adjustments in the scope of the database or the work plans that result.

The needs assessment database should include the following information:

- Current health conditions, including rates of asthma, obesity, diabetes, heart disease, and other chronic illnesses related to the built environment;
- Built environment conditions (miles and connectivity of bike lanes and sidewalks, paved roads, curb and gutter, transit service, pedestrian safety controls and measures, and residential proximity to major roadway pollution sources);
- Quality and quantity of affordable housing;
- Existing adequacy of basic services (water, sewer, storm water drainage) as well as their adequacy to support target levels of growth from the RTP/SCS; and
- Access to grocery stores, education, employment, and medical care services.

The COG should then develop an action plan that includes, at minimum, the following information:

- High priority funding needs based upon criteria identified in the database; and
- Action steps or strategies that the COG could undertake to support local jurisdictions, member agencies, and communities in securing the necessary funding.

Natural and Working Lands Conservation Policy

There are two parts to this proposal. The first part would be a binding policy applying to projects on the RTP transportation project list. The second part asks that the COG work with local land use jurisdictions on policies to reduce land conversion. The purpose of both is to protect farmland, rangeland, and natural lands in the County while incentivizing the efficient use of land and helping transportation projects through the CEQA process.

Part One

The COG Policy Board would set a threshold of significance for the loss of natural or working lands, and this threshold would apply to all transportation projects funded as part of the RTP. The threshold is to some extent arbitrary, but this proposal recommends ten (10) acres. If a transportation project consumes less than ten acres of natural or working lands, the loss would be deemed insignificant and no mitigation would be required. If a transportation project consumes more than ten acres of land, it would be deemed a significant loss and the project would be required to mitigate for that loss of land at a 1:1 ratio. The mitigation lands should be of equal or greater value compared with the land consumed.

The vast majority of projects under the RTP would never be affected by this policy. Large-scale road building or widening would be affected. Those projects would in return receive a simple way to evaluate the loss of natural and working lands during the CEQA process and would therefore most likely be spared the threat of lawsuit regarding the loss of land associated with the project.

As an example of cost for a large-scale project, there is currently a CalTrans project in Tulare County where the loss of farmland and possible mitigation are being discussed. The project—known as Tulare Expressway—would realign and widen 9.3 miles of State Route 65 between Lindsay and Exeter. The project would consume approximately 320 acres of farmland. The cost for the project—without mitigating the farmland impact—is estimated at \$94.5 million to \$97 million. Based on previous mitigation agreements in Kern County as well as one farm appraisal near the project site, an estimate for acquiring conservation easement on 320 acres of local farmland was between \$1.28 million and \$2.56 million, or 1.5%-3% added to the estimated cost of the project. Each Caltrans District has EEMP funds specifically set aside for the mitigation of farmland loss, and these funds can be matched by the Department of Conservation. Most likely, an estimate for conservation easement over rangelands or most natural lands would be considerably less than for productive farmlands.

Part Two

“Given that greenhouse gas emissions from urban land can be more than 70 times greater per unit area than cropland (Haden et al., ms. submitted), policies that preserve agricultural land will also help achieve the mitigation targets set by California’s recent suite of climate policies, namely AB 32 and SB 375” [From *Vulnerability and Adaptation to Climate Change in California Agriculture*, prepared for the California Energy Commission by U.C. Davis, Jackson et al, 2012]

SB 375 mandates the collection and consideration of the best available information about farmland and open space resources. Currently, the alternate scenarios created by the COG will be analyzed for both acres of land consumed and acres of important farmland consumed. We ask the COG to go beyond these simple measurements to assist local jurisdictions in developing strategies to reduce land conversion over time.

The first step in this process would be to provide additional information to regional stakeholders regarding the benefits of reducing land conversion and related impacts in the alternate scenarios, specifically adding discussion of:

- Greenhouse gas increase as a result of conversion of agricultural and natural lands to urban uses (based on U.C. Davis research cited above and other relevant science);
- Reduction in agricultural economic output resulting from conversion of agricultural lands to urban uses; and

Second, we request that the COG, working with local jurisdictions, conduct an assessment of current land use plans and policies in the county (as well as LAFCO) to determine the effectiveness of current policy approaches in reducing land conversion over time and to highlight best practices. This assessment would also identify additional strategies for reducing land conversion over time (e.g. by looking to other Central Valley jurisdictions for such strategies), which local jurisdictions could then independently consider. The results of this assessment should be made available to the public and COG Policy Board in a timely manner so they can be considered in the decision making process.

Third, we request that the COG include in the SCS one or more mechanisms for tracking local progress towards implementation of the SCS ultimately adopted. These mechanisms should allow a determination at any given point in time of whether the actual transportation and land use decisions that have been made by local jurisdictions are consistent with and will contribute to meeting the GHG reduction goals of the SCS. We expect that one such tracking mechanism would be land use efficiency as measured by conversion of farmland and natural lands as development proceeds.

Conclusion

We believe that Policy Board adoption of the above proposals as part of the RTP/SCS would make the Fresno COG a leader in natural and working lands conservation, thus serving as a model for other counties in the region. We further believe that adoption, and future implementation, would further the region's ability to meet the mandated SCS targets while providing fiscal and other benefits over time, both locally and regionally.