



June 17, 2021

Jennifer Soliz
Associate Regional Planner
Fresno County Council of Governments
2035 Tulare Street, Suite 201
Fresno, CA 93721

RE: Draft Action Element for 2022 Regional Transportation Plan / Sustainable Communities Strategy

Dear Ms. Soliz,

I am writing on behalf of Sequoia Riverlands Trust (SRT) to comment on the Draft Action Element for the 2022 Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS). SRT is a regional, accredited land trust that inspires love and lasting protection for important lands. We have conserved over 40,000 acres of habitat, agricultural land and other open space, including multiple farms and ranches in Fresno County, and we have had the honor of representing environmental stakeholders on the Fresno RTP Roundtable during preparation of the 2018 and 2022 RTP/SCSs. SRT also leads the Southern Sierra Partnership, a coalition of business and conservation organizations that serves a seven-million-acre region stretching from the valley floor to the peaks of the Sierra Nevada and Tehachapi Ranges, and including much of Fresno County.

As the 2018 RTP/SCS points out, Fresno’s “farmlands, open space and natural resource areas are critical for the region’s environmental and economic health.”¹ Fresno County is home to some of the most productive agricultural land on the planet, as well as groundwater recharge areas, habitat crucial to preserving biodiversity in a changing climate,² and other irreplaceable natural resources. In light of the current drought, the likelihood that hundreds of thousands of acres of agricultural land will be converted to less water-intensive uses as Sustainable Groundwater Management Act implementation proceeds, and the continuing growth of our region’s population, conserving the remaining viable farmland is particularly important.

¹ Fresno Council of Governments. 2018. 2018-2042 Regional Transportation Plan / Sustainable Communities Strategy, page 3-16. Available at <https://www.fresnocog.org/project/regional-transportation-plan-rtp/>.

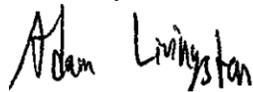
² Southern Sierra Partnership. 2010. Framework for Cooperative Conservation and Climate Adaptation for the Southern Sierra Nevada and Tehachapi Mountains. Available at <http://www.southernsierrapartnership.org/ssp-framework.html>.

For these reasons, 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,”³ 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.”⁴ 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.

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,”⁵ helping to translate this aspiration into a reality on the ground.

We look forward to discussing these points at future RTP Roundtable meetings, and appreciate your consideration.

Sincerely,



Adam Livingston
Director of Planning and Policy
Sequoia Riverlands Trust

³ Draft Action Element, Goal #2 (Policy 7).

⁴ Kings County Association of Governments. 2018. 2018 Regional Transportation Plan / Sustainable Communities Strategy, page 4-51. Available at https://www.kingscog.org/vertical/Sites/%7BC427AE30-9936-4733-B9D4-140709AD3BBF%7D/uploads/KCAG_2018_RTPSCS_Full_Document.pdf. For more on how such a policy could be formulated, see Livingston, A. 2016. Sustainable Communities Strategies and Conservation: Results from the First Round and Policy Recommendations for Future Rounds, page 70. Available at <http://www.southernsierrapartnership.org/scs-policy-report.html>.

⁵ Draft Action Element, Goal #2 (Policy 7).