

Dear Susan -

Thank you for the opportunity to comment on the RTP Guidelines. The following are comments from The Nature Conservancy (the comments in blue represent TNC edits; the comments in red are the proposed changes to the RTP guidelines as expressed in the most recent draft:

1. Include regional conservation plans or maps in the requirement that the MPO consult with state and local agencies.

Rationale: regional conservation plans or maps are often the best source of information on natural resources.

Sec. 5.3 SAFETEA-LU Environmental Requirements

Requirements (Shall)

Title 23 CFR Part 450.322(g)(1) and (2):

“Requires that the MPO shall consult, as appropriate, with State and local agencies responsible for land use management, natural resources, environmental protection, conservation, and historic preservation concerning the development of the transportation plan. The consultation shall involve, as appropriate: (1) Comparison of transportation plans with State and regional conservation plans or maps, if available;...”

2. Expand on the existing language referring to regional advance mitigation.

Rational: the concept needs to be explained in more depth.

Sec. 5.3 SAFETEA-LU Environmental Requirements

Best Practices: Advanced mitigation planning to identify areas for mitigation prior to project-by-project discussion is a best practice. Elkhorn Slough Early Mitigation Project and Regional Advanced Mitigation Planning (RAMP) are important examples of such efforts. By coordinating early with agencies responsible for project-level permitting to evaluate the individual and cumulative impacts of one or several projects and focusing mitigation on regional priority conservation opportunities in the region, ecosystem-scale conservation needs can be met, providing more effective conservation and mitigation. In addition, the time and cost inefficiency of project-by-project review, permitting, and mitigation can be avoided, thereby making mitigation more efficient. MPO’s and RTPA’s should consider using RAMP in siting and mitigating for infrastructure projects, in order to maximize time efficiency, reduce mitigation costs, and protect the respective region’s natural resources. ~~...can lead to identification of regional priority conservation areas and to more effective mitigation.~~

3. Add a bullet on watershed protection to the examples of priority conservation areas.

Rationale: The bullet was inadvertently left out of the TNC proposal. Watershed integrity and water quality is a critical element in conservation.

Section 6.24 Sustainable Communities Strategy Development:

Addressing Resource Areas and Farmland

The SCS is required pursuant to Government Code Section 65080(b)(2)(B)(v) to gather and consider the best practically available scientific information regarding resource areas and farmland in the region (as defined in Government Code Section 65080.01(a) and (b)). The SCS may include a narrative description, map, data, or other resources (or any combination thereof), developed in consultation with the appropriate resource agencies including cities and counties, which identifies regional resource areas and farmland. The SCS could also identify regional priority areas for conservation and mitigation efforts, based upon existing publicly available information and developed in consultation with the appropriate resource agencies including cities and counties. Examples of such priority conservation areas include but certainly are not limited to:

- Areas important for the maintenance of endemic, rare, or imperiled plant and animal species and communities,
- Areas that provide connectivity between natural habitats, especially in areas with high rates of land use conversion including riparian areas and areas with low levels of fragmentation from human land uses and infrastructure,
- Natural areas adjacent to existing public or privately protected areas that serve to buffer and improve habitat values,
- Existing farm and ranch land,
- Natural areas important for carbon storage and sequestration including forest land, and
- Areas that can serve to buffer developed areas from natural disturbance such as floodplains or natural fire breaks.
- Areas essential for maintaining or improving the integrity of watersheds, and for maintaining or improving the water quality and availability in surface water bodies and groundwater tables.

Sections 5.3 and 5.5 of the Guidelines include more information regarding best management practices for the consideration of environmental resource areas and farmland in RTP development.

Please feel free to contact me if you have questions.

Sincerely,

Liz O'Donoghue