WOODCOCK PLANNING AND ENVIRONMENTAL SERVICES

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RECEIVED

Gina Francis, Senior Staff Analyst Fresno County Public Works and Development Services Department 2220 Tulare Street, Sixth Floor Fresno, CA 93721 JUN 0 8 1999

COUNTY OF FRESNO PUBLIC WORKS & DEVELOPMENT SERVICES DEPT.

Dear Ms. Francis

Subject:

City of Firebaugh's Comments Related to the Notice of Preparation

County of Fresno's Notice of Preparation - General Plan Update

On behalf of the City of Firebaugh, and in my role as the City's Contract City Planner, I respectfully submit the City's comments in response to the Notice Of Preparation for the County of Fresno's General Plan Update. Please note that other than information presented at various meetings related to the process, the City of Firebaugh understands that crucial information to be used in the General Plan Update and EIR is still being prepared and will not be available in advance of the close of the comment period on the Notice of Preparation.

A primary concern of the City of Firebaugh is related to the proposed population assignments and related demographic projections. Without this information, the City is not able to provide more substantive comments. The City of Firebaugh respectfully anticipates that the population and economic projections will be coordinated/discussed with the City in advance of the release of the General Plan and EIR.

Without this vital information, the City of Firebaugh's comments are unfortunately limited to general issues of concern to the City. Because the General Plan and EIR are being developed together, the City's comments apply to both the General Plan and EIR.

Based on the County's intention to prepare the Environmental Impact Report at the same time the General Plan Update is advanced, the City of Firebaugh requests that it be provided notice of all future meetings, workshops, discussions, etc. so that the City may be an on-going active participant in the General Plan and EIR process. The City also understands that as the General Plan Update and environmental analysis are developed and provided to the City of Firebaugh, the County of Fresno, the General Plan Consultant, and the Environmental Consultant will accept comments on an ongoing basis in advance of the public review and comment period on the General Plan and EIR and that comments will not be limited to this Notice of Preparation time limit.

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The City of Firebaugh's comments are as follows:

- The City of Firebaugh is a joint partner in the I-5 Development Corridor. The County General Plan's land use and economic development strategies will need to reflect these and other economic development efforts being undertaken by the City of Firebaugh. Related, the City of Firebaugh understands that certain uses that may be attracted to locate in the I-5 Corridor Area may best be located outside of the incorporated cities due to their nature of operation, size, etc. Therefore, Policies related to supporting development in the I-5 Corridor including referral of projects to the I-5 Corridor Cities for comment, revenues, etc. need to be established. Other economic development programs employed by the City of Firebaugh, such as redevelopment among others, also need to be reflected in the County's General Plan and EIR.
- Projects proposed to be within the City's Sphere of Influence including but not limited to subdivisions and parcel splits, those allowed under the County's Director's Review and Approval procedures, etc. may have an effect on the City's ability to implement its own General Plan. Accordingly, the General Plan and EIR need to present referral policies to guide development within the City's Sphere of Influence.
- The City of Firebaugh supports recreational development along the San Joaquin River Corridor. The Open Space and Recreational policies of the General Plan Update need to support this on-going effort.
- The municipalities on the westside of Fresno County are reliant on groundwater for their domestic water needs. However, pumping in excess of the safe yield of the aquifer is occurring. This has not only affected the municipal use of the groundwater but also agricultural uses. The pumping has lead to the degradation of groundwater quality and quantity and to land subsidence. In the long-run, this will adversely affect agricultural production in the Firebaugh-Mendota Area. Therefore, the County General Plan and EIR need to establish policies related to the protection and wise use of groundwater supplies and increasing the supply of surface water to the Firebaugh-Mendota Area to off-set that water which is being exported from the Area.
- The City of Firebaugh presently provides urban services to existing development located in Madera County. The City of Firebaugh believes that this area would best be served if it were incorporated into the City. The City would encourage the County of Fresno to enter into discussions with the County of Madera to amend the County boundaries to include that development in Fresno County. The City would also encourage that the General Plan and EIR include policy direction in that regard.

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If you have any questions on the above comments, please feel free to contact either myself at the address and phone number on the letter head or Joel Moses, City Manager, City of Firebaugh, 1575 11th Street, Firebaugh, CA 93622 (559)659-2043.

Sincerely,

Keith Woodcock

c: Joel Moses, City Manager