

June 8, 1999

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Gina Francis
Fresno County Public Works and
Development Services Department
Development Services Division
2220 Tulare Street, 6th Floor
Fresno CA 93721

Dear Ms. Francis:

SUBJECT: Notice of Preparation - Fresno County General Plan Update

By this letter, I am submitting comments on behalf of the City of Reedley regarding the Notice of Preparation of a Draft Environmental Impact Report for the Fresno County General Plan Update, pursuant to the letter dated April 30, 1999, from Kerry McCants, Development Services Manager.

Because the General Plan Update is not yet completed, it is difficult to comment on the potential environmental implications of the project. During the May 12, 1999, Draft EIR Scoping meeting, it was explained by the County's project team that the Draft EIR is being formulated concurrently with the General Plan Update. As such, only general comments can be provided at this time; specific comments will be formulated when the Draft General Plan Update and Draft EIR are available for review and comment.

Regarding potential environmental issues, I have enclosed the list of issues distributed during the May 12 meeting. Due to the expected breadth of the General Plan Update, I agree that all of these issues should be thoroughly evaluated in the Draft EIR.

In particular, the EIR should address the implications of future population growth and resulting consumption of land for housing and other land uses. A strong effort must be made in Fresne County (and throughout the Central Valley) to minimize urban sprawl by establishing reasonable policies for compact growth and more efficient use of land. Such an effort will reduce the consumption of agricultural land, the costs of constructing and maintaining urban infrastructure, the costs of providing many urban services, and degradation of air quality. The publication entitled "A Landscape of Choice", distributed by the Growth Alternatives Alliance and supported by the Board of Supervisors and many cities, including Reedley, provides an excellent basis for considering policies regarding compact growth.

I also have concerns about the population projections for the City of Reedley contained in the table entitled "Geographic Allocation of Population and Employment" provided with your Notice of Preparation. The

Fresno County General Plan Update Draft EIR Scoping Meeting - May 12, 1999

Issues to be addressed will include environmental impacts in the following areas:

- Land Use Implications
- · Agriculture
- Population and Housing
- Transportation and Circulation
- Air Quality
- Public Facilities and Services
 - Water Supply and Distribution
 - Wastewater Treatment and Conveyance
 - Storm Drainage and Flood Control
 - Solid Waste Disposal
 - Electricity and Natural Gas
 - Parks and Recreation
 - Law Enforcement
 - Fire Protection and Emergency Services
 - Schools
 - Social Services
- Water Resources
- Biological Resources
- Forestry and Timber Resources
- Mineral Resources
- Cultural Resources
- Visual Resources
- Public Health and Safety
 - Seismic and Geological Hazards
 - Hazardous Materials
 - Noise
 - Airport Safety

GEOGRAPHIC ALLOCATION OF POPULATION AND EMPLOYMENT 1996 and 2020 (Preferred Scenario)

EMPLOYMENT POPULATION Percentage Percentage 2020 1996 Increase 1996 2020 increase 370.781 602.021 62% 45% FRESNO COUNTY TOTAL 769.700 1,113,785 242,998 **\$62,658** 705.804 1,035,337 45% 64% EAST VALLEY TOTAL 63.017 61% 34.238 84% 69,260 111,534 Clovis 3,473 2,282 52% 5.347 7,142 34% Fowler 52% 221,994 381,989 72% 445,199 675,981 Fresno 2,699 4.165 54% 8,009 11.015 38% Kerman 5,745 9,042 11.562 28% 4,137 39% Kingsburg 2317 3,526 Orange Cove 7.186 9.150 27% 52% 3.293 5.075 **Partier** 9.967 12.892 29% 54% 8.863 12.535 Reedlev 20,928 27.715 32% 41% San Joaquin 3.718 6.291 60% 798 1.529 104% 8.273 11.985 Sanger 21,577 26,880 25% 45% 7.139 10.801 Sekma 29,038 33% 51% 21,867 Unincorporated East Valley 87,705 106,197 21% 46,966 58,716 25% SIERRA FOOTHILLS (county) 11.727 2.234 3.430 13.938 19% 54% SIERRA NEVADA MTNS (county) 6.146 906 5,711 9% 1.024 13% **WEST VALLEY TOTAL** 41,748 57,440 38% 24,610 34,870 42% Coalings 9,859 13.042 32% 4,265 6,242 46% Firebaugh 5.853 7,757 33% 2.626 3.952 50% Huron 6.267 9.456 4,328 51% 2,483 74% Mendota 8.627 11.838 37% 2,975 4.661 57% 15.347 12.260 Unincorporated West Valley 11,142 38% 15.687 28% COAST RANGE FOOTHILLS 274 299 9% 33 38 16%

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EXCERPT FROM 1993 REEDLEY GENERAL PLAN UPDATE

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POPULATION FORECAST

	3.0 Percent	6.0 Percent (and a second
1991*	16,238*	16,238*
1992	16,725	17,212
1993	17,227	18,245
1994	17,744	19,340
1995	18 <i>.2</i> 76	20,500
· 1996	18,824	21.730
1 997	19,389	23,034
1998	19,971	24,416
1999	20,570	25,881
2000	21,187	27,434
2001	21,823	29,080
2002	22,478	30,825
2003	23,152	32,675
2004	23,847	34,636
2005	24,562	36,714
2006	25,299	38,917
2007	26,058	41,252
2008	26,840	43,727
2009	27,645	46,351
2010	28,474	49,132
2011	29,328	52,080
2012	30,208	55,205

^{* 1991} State of California Department of Finance Estimate.

table shows the 1996 population for Reedley to be 20,928 and the community's projected 2020 population to be 27,715.

Although Reedlev does not actively seek population growth, the County's 2020 population projection seems low. Reedley has had an historical growth rate around 3%, which is accurately reflected in the enclosed excerpt entitled "Population Forecast" from Reedley's current General Plan. This forecast was prepared in the early 1990s. According to State Department of Finance population estimates, the City's 1999 population is 20,534, which is very close to the 1999 projection of 20,570 contained in the 3% forecast. If the historical rate of 3% continues, the City's 2012 population will be approximately 30,000, as shown in the City's forecast, which is significantly higher than your projected 2020 population of 27,715 (eight years later). Unless the General Plan Update foresees circumstances that will alter the historical growth rate in the City of Reedley, your population estimates, and employment and other population-based projections, should be re-evaluated.

Thank you for the opportunity to comment on these matters.

A. Michael Olmo

Community Development Director

Enclosures:

Draft EIR Scoping Meeting List of Issues

Fresno County Geographic Allocation of Population and Employment

Excerpt from 1993 Reedley General Plan Update

Stephen L. Hollister, City Manager

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