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To: Fresno County Public Works and Development Services
Development Services Division
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FRESNO COUNTY
PUBLIC WORKS & DEVELOPMENT
SERVICES DEPARTMENT

From: Harold Tokmakian *WT*

RE: COMMENTS, SCOPE AND CONTENT OF THE EIR FOR THE FRESNO COUNTY
GENERAL PLAN UPDATE

The following is in response to Fresno County's April 30, 1999 Notice of Preparation and request for comments about the scope and content of the Draft EIR and the Fresno County General Plan Update.

It is my understanding that the Project as described in the NOP is based on the information in the Background Report (5/97), the Economic and Growth Scenarios, the Board and Supervisors Policy Direction (7/28/98) and the Economic and Growth Allocation and Methodology Report (2/11/99).

COMMENTS

1. Project Characteristics

Reference is made to the Geographic Allocation of Population and Employment chart (p. 6, NOP), especially the allocations for the Unincorporated East Valley, Sierra Foothills and Sierra Nevada Mountains.

The analysis of the proposed project's environmental effects on unincorporated towns and places must be distinguished from the rural residential non-farm areas. Neither this chart nor information in the Background Report clarifies the contrasting conditions. In order to address and clarify the subject, the rural residential characteristics, particularly in the County's northeast valley deserve sensitive and realistic analysis. The project's principal objectives (p. 4, NOP) provide the necessary context.

The population figures ((p. 6, NOP) will be used to determine residential land use requirements according to the growth methodology described in Exhibits 21 and 23 of that document. (2/11/99) Single family residential density per gross acre is given as four. If the project's objective is to "promote compact urban development" (p4, NOP), a density of four is too low; the resulting allocation of land for residential use is too large. It seems to reflect current practice instead of the principles and analysis found in A Landscape of Choice where a significantly higher density and compact residential land development pattern is described.

The reverse side of the coin includes objectives to "minimize conversion of agricultural land" and "minimize the destruction and disturbance of natural habitat." Residential land allocations based on the above growth allocation methodology (2/11/99) can result in significant adverse effects and achievement of the foregoing objectives may not be possible.

2. Issues to be Addressed For Their Environmental Impacts

A list of issues was distributed by the consultant at the 5/12/99 Scoping Meeting. In my opinion, special attention and emphasis should be given to several of these topics.

a) Water supply: The economic scenarios for the project forecast insufficient surface water supplies and serious overdraft of the County's groundwater sources. Therefore, careful, in-depth analysis of both sources is essential. Existing and potential surface water resources now and in the future, within the County as well as from outside the County should be evaluated so that mitigation measures are meaningful. A recommendation for more study is not acceptable.

Groundwater is relevant especially to small urban communities and non-urban rural residential areas (See pp. 30, 31, Scenario D, Economic Scenarios "Population...in the Sierra foothills would grow to...six times its current size") It goes without saying that groundwater also is critical to sustain the County's agricultural production. What would be the implications of strict monitoring and conservation measures?

b) Air Quality and Transportation: Serious efforts must be made to attain state and federal air quality standards because economic development and quality of life objectives will not be reached otherwise. In order to address the problems, urban development densities and patterns must be linked to alternative transportation systems in order to significantly reduce vehicle miles travelled.

The typical EIR examines a project's environmental impacts separately. The list of issues handed out at the 5/12/99 Scoping Meeting suggests that this will be the case for the Fresno County General Plan Update also. This EIR should analyze the interrelationships between land use, transportation and air quality and identify integrated impact mitigation measures instead of producing limited measures derived from analysis of separate issues.

c) Displacement of Prime or Important Farmland: The land use implications of Scenario D (p. 30, Economic and Growth Scenarios Report) states that new development will consume about 100 square miles of farmland. Since 1965 when Fresno County's first General Plan was adopted, losses in the County's prime farmland have

occurred principally in three ways: (1) urban residential expansion on the edges of existing cities and towns with single family gross residential densities of about four houses per acre, (2) leap-frog urban development beyond the built-up edge of a city and (3) non-farm rural home sites. The loss of farmland must be analyzed and understood accordingly so that mitigation measures can be designed, enacted and effectively administered.

Farmland also may be lost from acreage taken out of production in the westside valley due to adverse water quality conditions. The concern for farmland preservation ultimately raises questions about our natural resources in general that can be answered best on a regional scale. Can there be any meaningful policies and programs unless they are understood in the context of the San Joaquin Valley region and the County's place in it?

3. Alternatives

A range of six alternatives is described briefly on page 8 of the NOP. Five and six are not clear and, as written, raise questions about their purpose and usefulness.

Is number six an alternative that is disguised as the environmentally sustainable alternative?

Should another alternative be conceived--one that is designed around the County's natural resource holding capacity? It would include policies for:

- a) Compact urban growth boundaries and higher densities,
- b) Agricultural land conservation and preservation,
- c) Water conservation practices, both urban and farm,
- d) Attainment of state and federal clean air standards.

Isn't this alternative best able to achieve the objectives of the Project? (p. 4, NOP)