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JUN 04 1999

FRESNO COUNTY
PUBLIC WORKS & DEVELOPMENT
SERVICES DEPARTMENT

June 2, 1999

County of Fresno, Public Works & Development Services Dept.
Development Services Division
2220 Tulare Street, 6th Floor
Fresno, CA 93721

Attn: General Plan Update

THE GENERAL PLAN UPDATE AND THE SCOPE OF THE ENVIRONMENTAL IMPACT REPORT

These comments will augment the statement made by the League of Women Voters at the May 12, 1999 scoping meeting.

LAND USE

The League of Women Voters of Fresno recognizes that land is a finite resource, not just a commodity, and believes that land ownership, whether public or private requires responsibilities of stewardship. Land use decisions must be based on: (a) limitations of natural resources, such as water, air and energy; (b) agriculture and (c) social and economic factors. Citizen participation must be an integral part of planning and managing land resources.

The League supports the development of General Plans as a foundation for long-term goals and objectives, and as a political promise to the community. Land use policies should preserve agricultural land, reduce the need for expanding service areas and encourage population densities which support mass transit.

The material prepared so far for the General Plan has been driven by economics. Given the persistent high unemployment in Fresno County this is an appropriate orientation. However, the League is concerned that this emphasis should not allow deterioration of Fresno County's agricultural base which is necessary for the long term sustainability not only of the County but is a significant resource for the state and nation. Therefore we would urge that policies in the plan should not allow additional encroachment into viable agricultural land. New development for growth should be contained within the present spheres of influence for existing cities and urban areas, including by-passed land and underutilized parcels. The County should not allow the development of new residential, commercial or industrial areas on productive agriculture land outside of existing urban boundaries.

The Economic Scenarios envision ever expanding urban boundaries. The decrease in acreage devoted to lower-value crops is just about equal to the increase in acreage in higher value crops (p. 25, *Economic & Growth Scenarios*) which seems to indicate that the plan does not consider urban expansion into these agricultural areas. If urban boundaries continue to expand onto non-productive lands there are other considerations such as water availability, transportation, and air quality issues that may constrict growth. Policies dealing with this urban development should be spelled out and the impacts of these factors should be carefully evaluated .

WATER QUALITY AND QUANTITY

The League position on water promotes the management and development of water resources in ways that are beneficial to the environment with emphasis on conservation and high standards of water quality appropriate for the intended use.

Water is one of the most critical resources in Fresno County. Its supply is limited and there are only a few methods for enhancement or for the development of new sources. In addition, existing water quality had been degraded in many areas of the County for both human consumption and agricultural productivity.

The League of Women Voters urges that in order to emphasize the importance of water to the future prosperity of the County, a separate Water Element should be added to the General Plan. Policies and programs should spell out ways in which the County should resolve water issues. Among other topics, a Water Element should include policies for the following:

- (1) development and maintenance of an inventory of ground and surface water supplies with a centralized data base to evaluate current and potential needs, demands, and uses,
- (2) water quality protection and improvement for both urban use and agriculture,
- (3) land use constraints for developing and using water resources,
- (4) water quantity enhancement including evaluation of the various methods for obtaining additional water including conservation,
- (5) regional impacts of water policies both to and from neighboring counties,

Each of these topics has far-ranging impacts for the sustainability of Fresno until the year 2020 and beyond. Policies and the environmental impact of such policies should be developed for each topic. Differences between the preferred scenario and the other scenarios should be clearly defined.

Overall the General Plan should coordinate water resource planning with land use and transportation planning and provide for future needs without encouraging urban land expansion. The Plan should also discourage water contracting and marketing policies which build up demand and establish rigid patterns of distribution and use. It should encourage a variety of water supply sources with emphasis on nonstructural alternatives.

TRANSPORTATION AND AIR QUALITY

The General Plan should include policies for a transportation system to move people and goods which includes a variety of transportation modes, with emphasis on increased public transportation services and other viable alternatives to reduce vehicle miles traveled. The system should be efficient, convenient and cost effective, it should serve all segments of the population and diverse geographic areas. It should minimize harmful effects on the environment, particularly air quality and it should be integrated with land use policies.

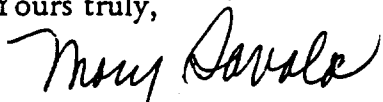
The primary responsibility for air quality rests with the regional Air Quality Maintenance District, of which Fresno County is a participant. The General Plan, therefore, should consider the impact on air quality of the industrial development that is proposed for the County. Since the San Joaquin Valley by virtue of its geography has the potential to become one of the most polluted air basins in the nation, every attempt should be made to encourage those industries that do not pollute the air or those which are able to reduce their pollution potential to a minimum. Similarly, policies for urban development should encourage densities that support public mass transit systems and discourage growth inducing transportation corridors that increase the need for ever increasing vehicle miles driven. Agricultural policies should support methods that reduce agricultural air pollution from such contaminants as dust, pesticides and agricultural burning.

AGRICULTURAL LAND PRESERVATION

Land use policies should identify appropriate land to be held for agriculture based upon criteria which include an available water supply, the best combination of physical and chemical characteristics and soil factors and the threat of urbanization. Techniques for preserving agricultural land should include tax relief, tax incentives and "less-than-fee" purchase of development interests in farmland. Water conservation must be a condition placed on the delivery and use of water for agriculture. Inter-basin transfer of water should be available only after conservation measures have been implemented. Incentives should be provided to promote soil and water conservation.

In conclusion, the League of Women Voters of Fresno appreciates this opportunity to participate along with others in the development of the General Plan Update and the draft EIR. Participation by its citizens in governmental decisions is the basis of our democracy. We would like to emphasize the need for the General Plan to recognize the importance of the long-term sustainability of Fresno County and its importance within the San Joaquin Valley region. The viability of Fresno's agricultural industry is essential to its future. Without conservation of our land, air and water resources no plan can be successful.

Yours truly,


Mary Savala, Co-President


Faye Wall, Co-President