



June 19, 2023

Chris Motta, Principal Planner
Department of Public Works and Planning
2220 Tulare St., 6th Floor
Fresno CA 93721

RE: Comment on the draft EIR for the General Plan Review and Zoning Ordinance Update

Dear Mr. Motta:

These are comments from the League of Women Voters of Fresno on the Draft Program Environmental Impact Report for the Fresno County General Plan Review and Zoning Update dated April 28, 2023.

Sometimes official documents are most important for what they don't say. That is true of the document referenced above. We believe that there should be a forthright discussion of the environmental impact of *not* having a Climate Action Plan as part of the Draft General Plan Policy Document. As early as 2012, the County had planned to include a Climate Action Plan in its General Plan Policy Document.

We have read, with astonishment, the Plan Policy HS-H.10 as cited on Page ES-12, which calls for an unspecified time frame for seeking full funding for the development and implementation of a specific Climate Action Plan. We also note Policy HS-H, which proposes "*a two-year window during which to adopt General Plan Amendment GHG emissions reduction trajectory consistent with state law.*"

What is missing is any sense of urgency or any hint that this is a priority. Climate impacts in the last few years have been striking and cannot have gone unnoticed. It must be apparent, too, that having a strong Climate Action Plan within the adopted General Plan brings significant advantages in streamlining the CEQA approval process.

We wish to note, also, the following language from the Environmental Impact Analysis section titled Significance After Mitigation, page 4.8-18:

*Buildout of the 2042 General Plan exceeds the established EIR threshold established for this EIR and impacts would be significant and unavoidable until a CAP is prepared and implemented under Mitigation Measure GHG-1 and GHG-2 to reflect the per service population targets in line with the reduction trajectory that meets statewide targets for emissions reductions. **If and when a County CAP is prepared and***

implemented in accordance with statewide emission targets, this impact may be reduced to a less than significant level. However, until the County prepared a CAP in accordance with Mitigation Measure GHG-1 and GHG-2, impacts from GHG emissions would remain significant and unavoidable. (Emphasis added.)

Because the Draft EIR concludes that development envisioned under the GPR/ZOU would generate greenhouse gas emissions exceeding acceptable thresholds and because it is presently knowable that the adoption of a Climate Action Plan may reduce such impacts to a less than significant level, it is even more important that the County not defer for two years and longer, if funding is unavailable, the study of the range of mitigation that is currently available to reduce the impact of greenhouse gas emissions. The County must also include in the Final EIR information that supports this unfortunate conclusion in the Draft EIR that the adoption of a Climate Action Plan may reduce the impacts on climate change to a “*less-than-significant level*”.

We urge you to begin immediately to prepare a Climate Action Plan. Much of the information is readily available. Waiting for full funding to pay for the development of a plan would waste valuable time, subject residents to needless suffering, and likely increase the cost of mitigation measures.

Sincerely,

Francine Farber and Kay Bertken
Co-presidents of The League of Women Voters of Fresno