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June 20, 2023

Chris Motta, Principal Planner
County of Fresno Department of Public Works and Planning
2220 Tulare Street, Sixth Floor
Fresno, CA 93721

Re: General Plan Review and Zoning Ordinance Update Project

Dear Principal Planner Motta:

I am writing on behalf of the Kings River Conservancy (KRC). Thank you for the opportunity to comment on the draft County General Plan Policy Document and associated Draft Program Environmental Impact Report (DPEIR).

As you know, KRC is a 501(c)(3) non-profit corporation founded on the principle that advocating for and protecting the lower Kings River benefits the community at large. The mission of the KRC is to foster community involvement in protecting and enhancing environmental values, to enhance and control public access for recreation, to educate the public on matters related to environmental values, to preserve agricultural lands and to encourage sound public conservation practices along the Kings River corridor between Pine Flat Dam and Highway 99.

We appreciate policies in the General Plan that recognize the importance of the Kings River and the County's relationship with the KRC. For example:

- Policy LU-C.11: Kings River Coordination. "The County shall work with the **Kings River Conservancy** and other similar organizations to develop opportunities for conservation and recreation consistent with the Kings River Regional Plan" (emphasis added).
- Policy LU-C.12: Ribbon of Gems: "The County recognizes the natural, aesthetics and recreational benefits of the Kings River and supports the **Kings River Conservancy's** implementation of the Ribbon of Gems" (emphasis added).

We are also glad that the County recognizes that the Kings River Regional Plan, adopted in 1983, is in need of updating. Specifically:

- Policy OS-H.9 provides that the "County shall develop a recreation plan for the Kings River as part of the update to the Kings River Regional Plan."
- Implementation Program LU-C.A provides that as "funding becomes available, the County will update and maintain the Kings River Regional Plan to guide County decision-making concerning land use and environmental quality within the Kings River influence area."



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The DPEIR recognizes that updating the Kings River Regional Plan, along with implementation of other policies in the General Plan, would avoid or mitigate significant environmental effects from the Project on the Kings River.

One area of note in the General Plan is the reference to a 7,000-acre State Route 180 / Trimmer Springs Road Special Study Area. (Policy LU-E.25.) This policy provides that the "County shall evaluate the Special Study Area for possible future urban residential, educational, office, and commercial land use." The Special Study Area will directly impact the lower Kings River. As such, the KRC requests that the Kings River Regional Plan be updated prior to, or concurrently, with review of the Special Study Area. Considering 40 years have passed since originally adopted, the Kings River Regional Plan is simply too outdated to serve as current guidance in line with modern standards and regulations for any urban style development to be considered along the Kings River corridor.

The KRC requests that a specific mitigation measure be added to the DPEIR, which requires that the Kings River Regional Plan be updated before any urban style development occurs along or near the Kings River influence area, including prior to or concurrently with evaluation of the Special Study Area. Additionally, consistent with Agriculture and Land Use Policies C.11 and C.12 (noted above), KRC requests to participate in the development of the updated Kings River Regional Plan as an involved public stakeholder.

Sincerely,

Susan Buckley, President
Kings River Conservancy

10942 East Promontory Way
Clovis, CA 93619
661-755-3308 / vk909sar@gmail.com