



SANGER UNIFIED SCHOOL DISTRICT

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ADELA MADRIGAL JONES
SUPERINTENDENT

June 26, 2023

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

Subject: Draft Program Environmental Impact Report for the Fresno General Plan Review
and Zoning Ordinance Update (SCH#2018031066)

Dear Mr. Motta:

This letter presents the comments of the Sanger Unified School District on the Draft Program Environmental Impact Report (DPEIR) for the Fresno General Plan Review and Zoning Ordinance Update. Our comments will focus on Section 4.14.4, Schools.

On page 4.14-11, the DPEIR states that “[t]he California Code of Regulations, Title 5 Education Code, governs all aspects of education within the state.” This is incorrect. The California Education Code is not part of the California Code of Regulations (CCR) and provides the governing regulations for education in the state. The Education Code contains 3 Titles and numerous divisions, parts, chapters, and articles containing hundreds of code sections, or individual statutes. CCR Title 5 does, however, include regulations that relate to school facility siting, design and construction.

On page 4.14-19, the following impact statement is made under IMPACT PS-3:

DEVELOPMENT UNDER THE GPR/ZOU WOULD FACILITATE DEVELOPMENT THAT WOULD ADD SCHOOL AGED CHILDREN TO THE COUNTY’S POPULATION. HOWEVER, FACILITIES HAVE ADEQUATE CAPACITY [EMPHASIS ADDED] AND NEW DEVELOPMENT WOULD BE REQUIRED TO PAY IMPACT FEES WHICH WOULD RESULT IN LESS THAN SIGNIFICANT IMPACTS WITH REGARD TO THE PROVISION OF SCHOOL FACILITIES. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

We did not see any supporting information backing up the statement that “facilities have adequate capacity.” Is this statement indicating that all school districts in Fresno County have adequate capacity to accommodate anticipated growth? We very much doubt this is the case and we know for a fact that this is not true for Sanger Unified.

~~~~~ *Every Child, Every Day, Whatever it Takes!* ~~~~~

**Trustees: Peter R. Filippi Va Her Ismael Hernandez**  
**Jesse Solorio G. Brandon Vang Jesse Vasquez Tammy Wolfe**

Chris Motta, Principal Planner

June 25, 2023

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Furthermore, although new development would be required to pay impact fees, the reality of the situation, which has been the case for many years, is that developer impact fees are inadequate to fund the new facilities necessary to accommodate students from new development.

Schools in California are funded by a combination of statewide bond measures, local bond measures in school districts and developer fees. State bond measures require voter approval and are anything but certain. When they are approved, the funds are often depleted quickly due to a backlog of unfunded projects. To get state funding, school districts must match it with a local funding contribution that mostly comes from local bond measures which must be approved by local voters. The amount of the bond measures are based on assessed valuation, and the measures require a supermajority vote of either a 55% or 66.6% vote depending on the amount requested. While developer fees are an important school funding component, they are substantially inadequate for funding schools unless state and local bond measures are approved. Obtaining the funding necessary for new school facilities in Sanger Unified has been difficult as the District has traditionally had inadequate assessed valuation to provide for bond amounts necessary to meet its school facility needs.

Thank you for the opportunity to review and comment on the DPEIR. Please let me know if you have any questions regarding this letter.

Sincerely,

A handwritten signature in blue ink that reads "Jimmy Robles". The signature is fluid and cursive, with a long horizontal stroke at the end.

Jimmy Robles  
Chief Operations Officer