



June 27, 2023

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Development Services Division
2220 Tulare Street, Sixth Floor
Fresno, CA 93721

Sent Via Email to: CMotta@fresnocountyca.gov

RE: Fresno County's 2023 General Plan Background Report, Policy Document, and Zoning Ordinance

Dear Mr. Motta,

Thank you for the opportunity to comment on Fresno County's 2023 General Plan Background Report, Policy Document, and Zoning Ordinance. The Fresno County General Plan update is long overdue. We are encouraged to see Fresno County undergoing the process to update the General Plan as we have been following this process closely for several years. Nevertheless, the County has failed to meaningfully and adequately incorporate input provided by residents of

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disadvantaged communities (DACs) and community based organizations to ensure that the plan invests in and supports healthy, thriving communities and equity. The undersigned organizations and groups write this letter to highlight our priorities, concerns, and recommendations noted in the released documents. This letter will focus on concerns and discrepancies noted in the Background Report, Policy Document, and Zoning Ordinance document to aid the County in updating the General Plan to ensure it is a plan that addresses the priorities of Fresno County residents. We are also submitting another letter to address the Draft Program Environmental Impact Report which takes a legal focus on several of the issues included in this letter.

The recommendations and observations noted in this letter stem from lived experiences and support from residents in the disadvantaged unincorporated communities of Cantua Creek, Three Rocks,¹ Lanare, Tombstone Territory,² Calwa, and South Central Fresno. Residents in these communities have actively sought to engage the County and other government entities to invest in and address historic disparities impacting their communities. For many years, Leadership Counsel for Justice and Accountability, Community United in Lanare, Friends of Calwa, South Fresno Community Alliance, and Central California Environmental Justice Network have worked alongside community residents in the aforementioned communities and have heard directly from residents the issues and solutions they would like to see come to their community. Based on this relationship we are able to elevate residents' concerns in this letter.

I. Insufficiencies in SB 244 Analysis

According to Government Code Section 65302.10.(a), cities and counties must include an analysis of water, wastewater, stormwater drainage, and structural fire protection needs or deficiencies for each of the identified communities in the land use element.³ In late 2018, Leadership Counsel for Justice and Accountability and Public Interest Law Project sued the County on behalf of Comunidades Unidas Por Un Cambio when the County failed to comply with SB 244. This lawsuit resulted in the County including a SB 244 analysis in the General Plan and beginning to name community deficiencies. However, the County fails to collect adequate information on community needs to truly identify water, wastewater, stormwater drainage, and fire protection deficiencies. It is crucial that the County conduct a complete SB 244 analysis to address infrastructure deficiencies and historically disinvestment in disadvantaged unincorporated communities. Doing otherwise will continue to harm residents and contribute to the ongoing local neglect that has impeded communities to see change.

¹ Also known as El Porvenir

² Also referred to as "Tombstone" throughout the letter

³ State of California Governor's Office of Planning and Research General Plan Guidelines, pg 5

Drinking Water Inadequacies

California has endured many years of dry summers and severe drought conditions that have greatly impacted the groundwater levels in communities that rely on groundwater. The County lacks critical information to determine the current and future status of private wells in the community. For example, Central Kings Groundwater Sustainability Agency includes several communities such as Tombstone, Caruthers, Selma and others. According to the GSP Dry Wells Tool,⁴ the number of dry wells is projected to increase in the Central Kings Groundwater Sustainability Agency where it is anticipated that there will be 397 to 405 dry wells in the next 20 years. In Tombstone alone, there are currently at least 15 dry wells and with many more at risk of going dry. The County's analysis fails to account for shallow and dry wells which have left residents without water and puts residents' water supply at risk. Residents in communities like Tombstone as well as Britten Ave continue to experience the negative effects of the drought and have resorted to getting a water tank installed outside their home and getting water delivered once a week to be able to have access to drinking water. This is worrisome because it does not only impact Tombstone and Britten Ave as this is the fate of many other communities in Fresno County who rely on private wells. Having access to this data allows the County to not only provide an analysis but also work on solutions with other agencies such as Groundwater Sustainability Agencies.

Moreover, for the community of Britten Ave the County states that residents depend on private wells to access their water. However, the County fails to acknowledge that the testing done for wells in Britten Ave have shown higher levels of nitrates and uranium beyond maximum contaminant levels. The current analysis is missing this critical information necessary to inform the County of actions it can take to address drinking water contamination.

There are other drinking water inaccuracies in the drinking water analysis, in addition to incompleteness. For the community of Lanare, the analysis inaccurately notes that the community relies on two community wells. The community has relied on one community well since at least Fall 2021 because the other well had to be shut off due to benzene issues. This is a concern to residents and puts them in a situation where they risk running out of water and not having another well to supply water to the community. According to a wastewater feasibility study conducted by Black Water Consulting Engineers, Inc. in 2021, the Lanare Community Services District water system has 152 residential connections, 3 agricultural connections, and one commercial connection.⁵ When there is an emergency, the existing community well will not have the capacity to adequately supply water to everyone in the community.

⁴ <https://www.gspdrywells.com/gsas/central-kings/mt/>

⁵ Lanare Community Services District Wastewater Collection, Treatment, and Disposal Planning, pg 6

Wastewater Inadequacies

The SB 244 analysis states that several communities do not have a community wastewater system and residents rely on septic tanks. However, the County fails to elaborate the extent to which residents experience septic failure. Due to the lack of wastewater infrastructure in unincorporated communities like Lanare, Tombstone, South Central and Britten residents often have to deal with the consequences of failing septic tanks. Septic tank failure causes wastewater to back up into the house, leads to groundwater contamination that affects drinking water sources, results in noxious odors, and impacts public health. The Office of Planning and Research (OPR) guidelines state that the County “should consider where there may be opportunities to provide more efficient, high quality service through consolidation, extension of services, and other regional solutions to address inadequacy of services and infrastructure.”⁶ The County disregards this guidance and simply states that communities are not a part of a wastewater system. Residents in these communities want to be connected to a wastewater system to end deficiencies such as leaching and increased water contamination. We therefore recommend the county incorporate all impacts associated with wastewater deficiencies and identify implementation actions it can take to address issues.

Stormwater Drainage Inadequacies

Throughout the analysis, the County inaccurately states that certain communities do not experience flooding. The communities of Cantua Creek, Three Rocks, Lanare, Tombstone Territory, and Britten Ave all experience flooding due to lack of storm drainage infrastructure. The County reached this conclusion based on a lack of flooding reported to the County and a site visit to County DUCs on a dry spring day in 2019. For example, for Britten Ave “No incident of flooding was reported during the winter of 2018 – 2019 or during the spring of 2019, which experienced average rainfall in the Fresno area.”⁷ This method of analysis results in inaccurate conclusions. This analysis fails to acknowledge the constant flooding, the effects of flooding, and the impact to day to day activities during this time period and beyond. Flooding in Britten creates puddles, a muddy road, and exacerbates road conditions causing residents to struggle to enter and leave their community. This is a huge impediment to getting children to school on time, adults to their jobs, and emergency services from entering and exiting the community. Residents share that postal service providers such as the United States Postal Service, FedEx, and Amazon have difficulty getting mail delivered when road conditions are impacted by flooding. Road conditions have gotten worse over time especially with the recent atmospheric rivers we have been experiencing this past winter.

⁶ 2017 General Plan Guidelines by the Governor’s Office of Planning and Research, pg 67

⁷ Fresno County Background Report SB 244 Analysis, pg 16

SB 244 Analysis Must Consider Climate Impacts

The 2017 General Plan Guidelines by the Governor’s Office of Planning and Research (OPR) states that, “[T]he analysis should consider both the horizon year and the impacts of a changing climate.”⁸ However, in the SB 244 analysis the County fails to mention that climate change is intensifying impacts on water, wastewater, stormwater, and fire protection infrastructure. Additionally, the current analysis for communities under SB 244 depicts a false representation of community needs when all the necessary information is not included. Therefore, we urge the County to complete an adequate analysis to determine water, wastewater, stormwater drainage, fire protection needs, and other infrastructure deficiencies in Fresno County.

Gaps In Funding Opportunities

Government Code 65302.10 states that cities and counties need to complete an “...analysis of benefit assessment districts or other financing alternatives that could make the extension of services to identified communities financially feasible.”⁹ Although we appreciate the County including Table 2¹⁰ to list potential funding and financing mechanisms to address SB 244 deficiencies, it is impossible for the County to name which funding opportunities communities can access when the SB 244 analysis is incomplete. As noted in this section, the County should first ensure information is adequate and include all the issues communities are facing. Additionally, the County should specify which funding source each community qualifies for and which deficiency will be addressed through that funding opportunity.

II. The County Needs to Play a More Active Role to Ensure Drinking Water and Wastewater Availability

Access to Safe and Affordable Drinking Water

Throughout the policy document, there is a common theme centered around protecting water for agricultural purposes but not policies to ensure communities have access to safe drinking water and wastewater services. This is despite the ongoing drinking water crisis in the County, with many households and communities with dry or contaminated wells. At the same time, the General Plan has various policies supporting the proliferation of agriculture, sprawl development, and oil and gas development all of which has the potential to negatively impact groundwater and drinking water supplies.

⁸ 2017 General Plan Guidelines by the Governor’s Office of Planning and Research, pg 66

⁹ State of California Governor’s Office of Planning and Research General Plan Guidelines, pg 11

¹⁰ Background Report, Fresno County SB 244 Analysis pg 241

Policy LU-A.22 should be changed to include the following language, “The County shall adopt and support policies and programs that seek to minimize the impact of reoccurring drought conditions and groundwater over pumping on ground water supply **for drinking water users dependent on groundwater supply in existing disadvantaged communities, including those reliant on domestic wells, state small water systems, and small community water systems.**”

Furthermore, the County must commit to implement a **policy during drought declarations to not approve new or replacement agricultural wells within a half mile of existing domestic wells, small water systems, and community water systems.**¹¹ During non-drought periods, at a minimum, the county must require a written report that ensures any new proposed agricultural and/or industrial well is both consistent with groundwater management planning and will not interfere with or dewater any domestic well, small water system and/or community water system within a quarter-mile of the new proposed well. **The County should adopt a presumption that new and replacement agricultural wells within a half mile of existing wells will cause well interference.** This will ensure communities do not have to compete with agricultural wells that are generally much deeper and higher capacity than domestic supply wells.

We acknowledge that there are other agencies who also play an active role in managing groundwater and ensuring there is a plan in place to mitigate overdraft. This means the County should be actively working with other agencies to ensure collaboration and help reach groundwater sustainability goals. This year the Department of Water Resources has started to review Groundwater Sustainability Plans (GSP) and has approved, denied or asked Groundwater Sustainability Agencies (GSA) to provide corrections to their plan to achieve sustainability by 2040. As per our Focused Technical Review of Groundwater Management Plans in the Kings subbasin, at least 43% of these domestic wells would be expected to be fully dewatered and an additional 14% of these wells would be expected to be partially dewatered based on current minimum thresholds.¹² This is a frightening statistic and a warning to the County to work with GSAs and drinking water users to establish clear demand reduction measures and timelines to ensure adequate groundwater management that is protective of domestic wells, small water systems, and community water systems. Adequate groundwater management and planning will also ensure groundwater supplies will be available to support potential growth in disadvantaged communities.

¹¹ For most high volume irrigation wells, the cone of depression is around half a mile. see Pfeiffer, Lisa, and C-Y. Cynthia Lin. "Groundwater pumping and spatial externalities in agriculture." *Journal of Environmental Economics and Management* 64.1 (2012): 16-30

¹² Central Kings GSP Technical Review; Focused Technical Review: July 22, 2019 North Fork Kings Groundwater Sustainability Agency Public Review Draft Groundwater Sustainability Plan; Focused Technical Review: August 15, 2019 North Kings GSA Public Review Draft Groundwater Sustainability Plan; available at <https://drive.google.com/drive/folders/1fARFXS91mksdmx4DJB0a-3HOCSBZ5UwE?usp=sharing>

Policy OS-A.10 should be changed to include the following language, “The County shall **review yearly water availability data** and coordinate with the relevant Groundwater Sustainability Agency(ies) concerning their Groundwater Sustainability Plan(s) and refer any substantial proposed General Plan amendment to the agency for review and comment prior to adoption. The County shall give consideration to the adopted groundwater sustainability plan when determining the adequacy of water supply.”¹³ The addition to this policy to have the County review yearly data on water availability will help the County plan for water availability needs rather than respond to water emergencies.

Furthermore, under SB 552 counties are “required to have a standing drought task force to facilitate drought and water shortage preparedness for state small water systems (serving 5 to 14 connections), domestic wells, and other privately supplied homes within the county’s jurisdiction.”¹⁴ The County is also responsible for developing a drought and water shortage plan in order to propose short and long term solutions to address drinking water availability. Examples of short and long term solutions include, but are not limited to, consolidating communities with existing water systems, private well drinking water mitigation programs, and emergency drinking water solutions such as delivery of bottled water, water tanks, and emergency interties. In our SB 244 analysis we have included drinking water issues communities face thus the County’s role in implementing SB 552 can serve as an additional tool to complement the role of GSAs in monitoring and protecting groundwater.

Lastly, Fresno County communities that are surrounded by agriculture have constantly sought greater drinking water protections. Due to the overuse of fertilizers, pesticides and chemicals as well as substantial quantities of manure on nearby livestock operations, groundwater contamination continues to get worse, making it difficult and costly for water providers to deliver safe drinking water to communities and residents reliant on domestic wells to ensure safe drinking water supplies. Therefore, the County should revise **OS-A.18 to include clearly identifying sources of groundwater contamination impacting residential wells, protect communities from exacerbation of such contamination, address existing contamination of residents’ drinking water supplies and enact long-term solutions to ensure that residents have reliable access to safe and affordable drinking water.** This is necessary in order for the County to ensure consistency with Affirmatively Furthering Fair Housing duties and address a critical health and safety need that is an environmental justice (EJ) issue per the EJ Element.

¹³ Fresno County Policy Document, pg 2-121

¹⁴ Drought Planning for Small Water Suppliers and Rural Communities (SB 552), Department of Water Resources

Access To Adequate Wastewater Service

The General Plan does not contain any policies and programs to address adequate wastewater service in unincorporated communities reliant on failing septic tanks and/or where there is currently no sewer system. As mentioned in the SB 244 section, several communities we work with have failing septic tanks. The long term solution is often to connect these communities to existing wastewater systems, but as an interim measure for communities that are good septic-to-sewer candidates, and a long-term measure for those that are not, the County needs to create **policies centered around funding septic maintenance, repair, and replacement, as well as related education and outreach.** The County should create a program to assist with septic maintenance similar to the housing programs currently available for home improvements.¹⁵ This is a health and safety issue that requires immediate attention and response by the County.

III. Environmental Justice Element

Government Code Section 65302(h) requires the County to add an environmental justice (EJ) element to the General Plan to address the following three components:

1. “Identify objectives and policies to reduce the unique or compounded health risks in disadvantaged communities by means that include, but are not limited to, the reduction of pollution exposure, including the improvement of air quality, and the promotion of public facilities, food access, safe and sanitary homes, and physical activity.”¹⁶
2. “Identify objectives and policies to promote civic engagement in the public decision-making process.”¹⁷
3. “Identify objectives and policies that prioritize improvements and programs that address the needs of disadvantaged communities.”¹⁸

If implemented correctly this element can begin to address long lasting environmental injustices and serve as a powerful tool to bring positive changes to disadvantaged communities. We appreciate the efforts the County has made to include several new policies in the EJ element. Nonetheless, the County should include policies that intentionally address and reduce health risks in disadvantaged communities. This section addresses ways the County can improve the EJ element but the recommendations are not limited to only the following policies.

¹⁵See Calabretta, Investing in America’s Onsite Wastewater Treatment Systems for Equity and Sustainability, Environmental Policy Innovation Center (2022), available at https://static1.squarespace.com/static/611cc20b78b5f677dad664ab/t/62e7bcf56ab0635d9c1ecf0c/1659354397043/FI_NAL_EPIC_SepticFinancingReport_2022.pdf.

¹⁶ Office of Planning and Research General Plan Guidelines Chapter 4: Required Elements, pg 3

¹⁷ Office of Planning and Research General Plan Guidelines Chapter 4: Required Elements, pg 3

¹⁸ Office of Planning and Research General Plan Guidelines Chapter 4: Required Elements, pg 3

Pollution from Existing and Future Land Uses

Residents within the South Central Fresno area are disproportionately overburdened by different pollution sources. The County attempts to address the process for project development in this area in policy EJ-A.7.

While EJ-A.7¹⁹ is a policy that will require the Air Pollution Control District to be involved in the development review process for applicants located within the South-Central Fresno AB 617 bounded area, this policy will not support efforts to reduce pollution in other disadvantaged communities of the County, nor will it allow these other overburdened communities to have an environmentally just review of impactful incoming development. To ensure that EJ-A.7 policy is effectively serving the AB 617 South Central Fresno area, the policy language should also state that **“the County should consult the established Community Steering Committee and the Air District. When the Community Steering Committee and the Air District gives comments and recommends that an industrial development application not be approved due to the oversaturation of polluting sources and detrimental environmental impacts on a community, then the County should honor that recommendation and not move forward with that industrial project.**

Additionally, policy EJ-A.2 also targets polluting land uses. We recommend the County include the following language,

“The County shall require buffering and screening requirements as part of the development review process for all new and existing potentially pollution producing land uses proposed to be located adjacent to existing sensitive land uses that have historically been associated with heightened levels of pollution. These land uses associated with pollution include industrial land uses, agricultural operations using pesticides applied by spray techniques, wastewater treatment plants, and landfills and waste treatment facilities.”²⁰

The way policy EJ-A.2 is currently worded does not apply to existing pollution producing land uses where pesticides exposure and industrial pollution are present and cause several health issues. Residents in Cantua Creek, Three Rocks, Lanare, Tombstone, and South Fresno are surrounded by agriculture and would not benefit from this policy despite being vocal over the years about how their health has suffered as a result of pesticide exposure. The County needs to create policies that are truly enforceable. All residents deserve to live in a community where they can go outside and breathe clean air. While greater distance between new industrial uses and existing communities and sensitive receptors through buffering policies are needed, buffering

¹⁹ Fresno County General Plan, Policy Document pg 2-204

²⁰ Fresno County General Plan, Policy Document pg 2-204

only through set-backs on parcels planned for industrial development is not sufficient to address the environmental injustice perpetrated by the County through its designation and zoning of land surrounding communities for industrial use. We urge the County to redesignate and rezone land within a 1/2 mile of existing and planned sensitive uses to community-serving, non-industrial land uses. This will both help protect communities from further industrial encroachment and concentrated environmental burdens and create new opportunities for land uses desired by residents, including parks, housing, retail, education, and more.

Environmental Justice must be at the forefront of policy planning and land use decisions.

Another policy that needs to be improved is Policy EJ-A.6: Caltrans Coordination which states that, “The County shall coordinate with Caltrans to encourage the development of projects to mitigate roadway pollution along major interstates, such as the development of green barriers near existing sensitive land uses.” This policy language should be revised to, “**The County shall not pursue projects with or support projects by Caltrans that harm environmental justice communities.**” The current policy fails to protect environmental justice communities from continued harm and is unenforceable. Our proposed policy is consistent with Caltrans commitments to racial equity.

Green Spaces in Disadvantaged Communities

The General Plan places an emphasis on the County's location near Yosemite, Sequoia, and Kings Canyon National Park as tourist assets, but the County does not do enough to make these areas accessible to residents or to directly address park deficiencies within disadvantaged communities. Throughout the years, residents in disadvantaged communities have asked for trails and parks in their communities to allow them to partake in physical activities. **Policy OS-H.6** states that the County “shall encourage the development of parks near public facilities such as schools...” which is the case in Cantua Creek and Riverdale where there are currently schools in these communities. However despite multiple requests from residents over the years to bring a park to their community, the County has failed to accomplish this and the language in this policy will not allow this to happen. Using words like “encourage” creates a false hope that the County is working to bring parks to communities near certain facilities. Instead we ask the County to create a **policy that commits the County to rezone land for parks to facilitate the development of parks.** Furthermore, some park benefits include improved mental and physical health, brings communities together, and improves air quality. While we appreciate that the Draft General Plan now includes a policy for the County to seek funding for parks, **Policy EJ-B.7**, as drafted, the policy provides little assurance that communities will actually benefit from increased or improved park space as a result. First, the policy fails to state how often the County will seek this funding and how the County will prioritize funding across different communities. The County should create a local fund in the likely case there are difficulties and delays in regularly

securing the funding mentioned in this policy. Additionally, **Policy EJ-B.2** states that the County will promote physical activity by removing barriers to outdoor activity. The absence of green spaces, trails, bike lanes, and sidewalks are currently barriers in partaking in outdoor activities. Therefore, the County needs to allocate local funding to go directly to disadvantaged communities to begin to address these barriers. The County can start by recording the lack of these amenities in each community on a document that can be updated each year to reflect the County's progress.

Policy EJ-B.2 and EJ-B.7 state that the County will work with community services districts (CSD) but fails to include communities that do not have this local government entity in place. Engaging with current CSDs is a good way to work and invest in these communities but the County needs to also ensure funding will be allocated to communities without a CSD especially in a County Service Area where the County already has an active role. In summary, we are asking the County to do the following:

- **Policy OS-H.6:** Rezone land to develop parks in communities that have schools.
- **Policy EJ-B.7:** Create a local fund to secure park funding from local, state, and federal sources and determine which communities will be prioritized. The County should also develop a parks master plan.
- **Policy EJ-B.2:** Create a local fund to bring trails, bike lanes, and sidewalks to disadvantaged communities.

IV. Disadvantaged Unincorporated Communities Require Additional Public Services

Despite repeated requests for planning and investment, disadvantaged unincorporated communities remain extremely vulnerable to the impacts of climate change, lack access to basic services and amenities, are exposed to disproportionate sources of pollution, and lack the basic features of healthy and thriving communities, including safe and affordable housing, active transportation infrastructure (sidewalks, curb and gutter, streetlights, tree canopy), and green spaces.

For these reasons, we are particularly concerned with the inclusion of the following policy:

“LU-E.25 State Route 180/Trimmer Springs Road Special Study Area The approximately 7,000-acre generally located north of the State Route 180/Trimmer Springs Road interchange is designated as a Special Study Area. The County shall evaluate this Special Study Area for possible future urban residential, educational, office, and commercial land uses.”

As noted throughout this letter, significant infrastructure and basic service deficiencies exist in long established disadvantaged unincorporated communities. We urge the adoption of policies focused on addressing needs and opportunities in existing disadvantaged unincorporated

communities before resources are directed towards new growth areas. Doing so would not only comply with the goals of SB 1000, but would also align with state climate and equity goals and state planning priorities. The County must also take proactive steps to eliminate barriers to investment in existing communities such as policies that prioritize investment and planning in new areas or where the county deems they can be built.

Fire Protection Infrastructure

Residents in Cantua Creek, Three Rocks, Lanare, and Tombstone all lack access to a fire station in their community. It is important to note that in the past Cantua Creek did have a fire station, however the building is now empty. As a result, Cantua Creek residents pay higher home insurance rates due to lack of a fire station within certain miles of the community. There is a County wide slow response rate that does not allow the County to adequately protect residents from fire-related threats. In Lanare, it takes 30-40 minutes for a fire truck to arrive and respond to a call. In some instances, residents have reported illegal burning of tires, mattresses, and other items and have received no response. Therefore we recommend adding the following sentence to policy PF-H.3, “The County shall require that new fire stations be located to achieve and maintain a service level capability consistent with services for existing land uses. **The siting of new fire stations should have a response rate of less than 15 minutes.**”²¹ If the County can not provide fire stations in all communities in Fresno County, it is imperative that the County work with existing fire stations to bring reliable, efficient fire protection services as stated in Policy PF-H.1.

V. The County Needs to Urgently Address Climate Adaptation Planning

Fresno County is experiencing the effects of climate change through extreme heat, drought, wildfires, storms, and more. It is past time for the County to be proactive by creating policies that truly address climate change and the disproportionate threats faced by low-income communities and communities of color which experience the most acute climate-related threats and impacts.

The threat to climate change impacts has been noted in the SB 244 analysis of our letter along with stormwater drainage deficiencies. The urgency to address these impacts and create policies need to be clearly stated in the General Plan. **Policy HS-C.6** can be more effective if the following changes are made, “The County shall **expand** stormwater and flood protection infrastructure capacity in order to accommodate changes in precipitation and extreme weather events including the establishment or expansion of recharge basins.”²² By using words like “encourage expansion” this policy does not clearly apply to communities that do not have stormwater or flood protection. Therefore, the wording should be changed to explicitly apply to

²¹ Fresno County General Plan Policy Document, pg 2-114

²² Fresno County General Plan Policy Document, pg 2-172

communities that lack such protection, especially disadvantaged communities which lack resources to finance and address flood protection needs. Without the County's commitment to seek financial assistance to ensure the installation and maintenance of stormwater and flood protection infrastructure that meets these communities needs, it will not accommodate changes in precipitation and extreme weather events. Again, there are several communities in the County that need this basic infrastructure.

Last year the Board of Supervisors voted to disapprove a grant proposal which would have provided funding to do the following, “[S]upport existing efforts mandated through legislation aimed at climate resilience, which aims to anticipate and prepare for impacts to reduce the damage from extreme weather events, as well as chronic, long-term shifts, including those resulting from or aggravated by drought, flood, wildfire, extreme heat, and rising seas”.²³ This funding would have supported a necessary step to address climate change impacts in Fresno County and the alarming and counterintuitive decision to reject the funding was a disservice and detrimental to residents and future residents of the County. We recommend **policy HS-G.1** to include the following language, **“The County will actively take steps to develop and implement plans based on sound science to reduce the impacts of climate change.”** This change should not enable future decision makers in the County to reject funding, projects and regulations that will aid in fighting climate change. Additionally, the County should commit to provide a valid explanation to the community if there is ever an instance when future funding to address climate change is rejected.

Finally, **policy HS-G.2 should be changed to have the County update the Fresno County Climate Change Vulnerability Assessment every five years.** Again, the impacts of climate change are not taking a pause and continue to harm communities every day. Updating this assessment and working on strategies centered around climate crisis response allows the County to prepare for emergencies rather than respond to them when the impact is greater.

Investing in Community Resilience Centers

Community resilience centers can serve as a space to access resources, serve as a cooling and warming center, host food distribution, host physical activity classes, mobile health clinics, educational workshops, and more.

The County includes policies HS-A.3 and HS-A.4 which focus on responding to emergencies such as flooding, fires, and earthquakes where there is a physical space to attend to the needs of a community. This is vital in the County where communities are spread throughout the County and need to have a space to shelter in case of an emergency. In addition to HS-A.3 and HS-A.4, the

²³ February 22, 2022 Board of Supervisors Agenda, Board Agenda Item 50, pg 2

County should develop community resilience centers at existing and new facilities by committing to seek local and state funding. Consequently, this policy will aid in fulfilling several policies in the environmental justice element such as EJ-A.4, EJ-A.8, EJ-A.9, EJ-C.1, EJ-C.2, EJ-C.3, EJ-C.4, EJ-C.5, and EJ-C.6.

VI. Economic/ Industrial Development Must be Equitable

Policies must not exacerbate the environmental degradation of disadvantaged communities

Despite requirements under Government Code sections 65302(h) (environmental justice planning), 65302.1 (air quality element), and civil rights laws, the Draft Policy Document continues to describe an economic development strategy that directs polluting land uses to disadvantaged communities and fail to meaningfully protect communities from both existing and future industrial, waste management, and energy-production land uses. For example, in Chapter 2, policy ED-A.7 refers to Locating New Industrial Sites. While it is a positive change that the language was deleted from the policy draft that stated that the “Initial focus of potential new or redeveloped industrial areas shall include Malaga, Calwa, and the Golden State Industrial Corridor”²⁴, without changing existing land use designations that direct industrial development into the same disadvantaged communities, the effect is still the same. There are many clusters of homes and small apartment units along the Golden State Corridor as well as the communities of Malaga and Calwa. It is well documented and known that the focus of additional industrial sites in this area will increase the levels of air, light, noise and traffic pollution in an area that already ranks in the top 1% of census tracts of the most overburdened areas in CA according to the CalEnviroScreen 4.0.²⁵ This area also overlaps with the designated AB617 area of South Central Fresno which was chosen for its extreme concentration and over accumulation of pollution sources.

Furthermore, policy ED-A.9: Fresno County Business and Industrial Campus Special Study Area, is being introduced in an attempt to still move forward with planning for additional industrial land uses in an area that should be completely off limits for further industrial development. The communities of Malaga, Calwa, and South Central Fresno are already overburdened ranking in the top 1% of census tracts of the most overburdened areas, and yet this Special Study Area will be located only ½ mile east of Malaga and will be a business park that is approximately 3,000 acres with 19 million square feet of industrial building space. The location of this study area will logistically require all of its heavy duty truck traffic to travel through Malaga from Highway 99 located to the west. The current community concerns already have the unresolved challenges of truck routes passing by the elementary school and running through the

²⁴ Fresno County General Plan pg 2-5

²⁵ CalEnviroScreen 4.0, OEHHA.ca.gov Census Tract 6019001500

residential areas of the community. This will also only be exacerbated by the increased amount of truck trips.

We propose that the County commit to performing an Industrial Compatibility Study. Also, for land that qualifies as disadvantaged communities according to the CalEnviroScreen, the County should redesignate land within a 1/2 mile of sensitive uses from industrial to commercial uses or other buffer-spaces or uses that meet community needs. We also propose that the County commit to developing a study that identifies areas for industrial development that will not impact DACs and redesignates land accordingly.

Policy ED-A.16: Regional Processing Facilities, states that, “ The County shall encourage processing facilities that ... may logically be expected to expand into regional processing facilities, to locate in industrial parks under city jurisdiction or within existing unincorporated communities areas with adequate infrastructure.” The areas of South Central, Malaga, and Calwa communities are classified as disadvantaged communities. As disadvantaged communities, they are already oversaturated with industrial facilities and cumulative impacts. Therefore, even though the remainder of the language of ED A.16 states that, “Processing facilities located in proximity to disadvantaged communities shall comply with the applicable provisions of the Environmental Justice Element”, there should be no intention nor plans to place more industrial parks within these communities, especially when this policy is written to encourage expansions of processing facilities..

The General Plan must not allow additional industrial development in the areas classified as disadvantaged communities.

Unfortunately, the Environmental Justice policy is written with the intent to continue industrial development in communities that are already confirmed to be overburdened with industrial and pollution impacts and yet the County wants to ignore this and continue the same practices. In the following policy, ED-B.4, again, there are no precautionary measures nor protections that are being written into this plan and the sole focus is on development regardless of the cost to the existing residents.

Policy ED-B.4 High-Speed Rail and Heavy Maintenance and Operations Facility states that “ If the heavy maintenance and operations facility is located in an unincorporated area of Fresno County, the County shall plan and identify land uses necessary to support and serve the heavy maintenance and operations facility of these facilities.”²⁶ There is no mention of what impacts that this could have on any existing communities that may be in the vicinity of these high speed rail facilities that are not yet constructed. **The policy should state that, “the County shall ensure that the HSR heavy maintenance and operations facility will not be constructed**

²⁶ Fresno County General Plan pg 2-7

near land uses of sensitive receptors nor shall these sensitive receptor land uses be changed in the future for the citing of heavy industrial uses.”

The Public Facilities and Services Element policy PF-A.3 Industrial Infrastructure, states that “The County shall require new industrial development to be served by community sewer, stormwater, and water systems where such systems are available or can feasibly be provided.” The consequences of this policy with its lack of accountability to the residential communities are that private wells are completely running dry while large industrial facilities have the means to have clean water. **The policy must include language that states that when industrial facilities are served by community sewer, stormwater, and water systems, then so shall the communities have the option of connecting to the same water and sewer systems.**

VII. Agriculture and Land Use Policies Must Prioritize Human Health

The Central Valley of California prides itself on its agricultural industries and yet the humans whose labor allows this multi billion dollar industry to flourish are those that suffer the most without the basic human rights of clean water, air, and healthy living conditions. The policies within the Agriculture and Land Use Element portion of the General Plan, focus on promoting agriculture without adequate protections needed for the residents of the rural communities near agricultural operations. This element must include protections from: fugitive dust from harvesting; exposure to toxic pesticides and its drift; and from contaminated groundwater from pesticide runoff and dairy biogas.

LU-A.13: Agricultural Buffers, states that “The County shall protect agricultural operations from conflicts with non-agricultural uses by requiring buffers between proposed non-agricultural uses and adjacent agricultural operations. Additionally, the County shall consider buffers between agricultural uses and proposed sensitive receptors when processing discretionary land use applications.”²⁷

The language should state that, “The County shall protect sensitive receptors from proposed agricultural and industrial uses when processing discretionary land use applications and that buffers should be required, as well as set backs, on parcels zoned for agricultural and industrial uses.” This will ensure that if and when existing uses are replaced and when new ones are proposed there is a protection from impacts through physical separations between agricultural and industrial uses and sensitive receptors.

²⁷ Fresno County General Plan pg 2-33

Also, this policy only applies to proposed new development and does nothing for existing communities in the form of: 1) preventative protections from pesticides through the use of a notification system and 2) protections from harmful pesticide chemicals that drift onto the homes and schools of rural communities. There are no adequate notification provisions built into the requirements for agricultural uses that impact humans, and yet there are protections of the agriculture lands.

We urge the County to establish a pesticide notification program led by the community. It is important to create a tool to inform the community of when pesticide application is allowed and how residents are notified. Therefore, create a Land Use Policy with language that states, **“In communities that are exposed to pesticide usage and drift, the County shall establish a notification system that is informed by residents including those who have suffered from impacts from the exposure. The Notification system will also include what type of non harmful chemical pesticide applications can be applied.”**

The County should also play an active role in only allowing non harmful chemicals to be applied to fields. The County Ag Commissioner, with the input from the community, should be required to create and adhere to a pesticide reduction plan with the goal of reducing the use of hazardous pesticides near sensitive receptors, especially in disadvantaged rural communities. Residents who live in communities surrounded by agriculture are often the residents working the fields near their house and understand that their job depends on the survival of agriculture. However, their livelihood does not depend on the continuation of applying toxic chemicals that are harming them and their community. In the Background Report the County notes the effects of pesticides by stating that “Exposure to high levels of certain pesticides can cause immediate health problems or even birth defects or cancer later in life. Farmworkers and anyone living near agricultural fields are most exposed to pesticides.”²⁸ Residents report that they experience elevated cancer incidences, asthma and other respiratory and health complications in many disadvantaged communities which are surrounded by agriculture and cumulative impacts of pesticide exposure, groundwater contamination, and diesel fumes from agricultural equipment. Residents attribute in part to the lack of buffers and increased exposures to pesticides and dust. The County must not ignore these risks and include actionable policies to reduce and wherever possible, avoid them.

The county’s response to the inhumane treatment of rural communities can not be the policy of LU-A.15: The Right-to-Farm Notice. While this policy states that, “residents in the area should be prepared to accept the inconveniences and discomfort associated with normal farming activities and that an established agricultural operation shall not be considered a nuisance due to changes in the surrounding area”,²⁹ residents' constant reports of nosebleeds, asthma attacks,

²⁸ Background Report, pg 3-73

²⁹ Fresno County General Plan pg 2-33

cancer hot spots, peeling bleeding skin due to pesticide exposure is beyond a discomfort or a nuisance. This policy prioritizes the convenience of commercial agriculture over the health and well-being of County residents, and in particular, residents of disadvantaged communities and people of color whose communities' are disproportionately surrounded by agriculture. Therefore LU-A.15 should be completely removed from the General Plan as it is not consistent with the environmental justice goals of EJ-A which states to ensure "the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation and enforcement of environmental laws, regulations and policies do not disproportionately impact any individual race, any culture, income or education level."

New and Expanding Dairy Operations

Large and expanding dairy operations impact Fresno County communities by contributing to air pollution, groundwater pollution, groundwater depletion, and odors and mosquitos. Lanare and Riverdale, for example, are surrounded by dairies and residents feel the impacts everyday, especially residents who have asthma and allergies. The General Plan should include a policy to protect sensitive receptors and other residents from the impacts of dairies and the zoning code should be updated to prevent further encroachment of large dairy facilities on residential communities and other sensitive receptors as follows:

LU.A.: The County shall work with community residents living within five miles of dairies, relevant local agencies including the air district, regional water quality control board, and groundwater sustainability agencies to develop enforceable policies and programs to prevent dairy operations from contributing to groundwater pollution, groundwater overdraft, air pollution, odor, and other nuisances including mosquitoes and flies.

The County must also update the zoning code to increase the required distance between dairy operations and residential uses and other sensitive receptors, especially with respect to unincorporated communities. We are particularly concerned that the required distance between dairies and unincorporated communities is only a half mile while the distance between city spheres of influence and dairies is one mile. This implicates increased impacts and burdens on disadvantaged unincorporated communities. **Accordingly, the zoning code should be updated to require at least a one mile buffer between unincorporated communities and dairy operations.**

While we recommend that the County prohibit the citing and expansion of dairies in the county unless a dairy can demonstrate that it will not in any way impact air quality, water quality, or groundwater resources or increase odor or flies and mosquitos, at the very least, **the county must change the zoning code to require all new dairies and dairy expansions to secure conditional use permits and go through a full CEQA review.**

Residents want to coexist with agriculture and dairies without having to jeopardize their lives for profit.

VIII. Transportation and Circulation Element

Transportation and Circulation improvements must include the improvements needed to benefit communities and not cause further environmentally unjust degradation.

As stated earlier in section IV, access to everyday amenities and meeting the transportation needs for rural and fringe communities is a constant challenge, along with the need to decrease the detrimental health and safety impacts from industrial development. There is great need to have transportation routes that allow for community members of rural areas to reach the larger cities of Fresno. This leads to the topic of the need for improved infrastructure, for the purpose of improving community, however, the policies of this plan are only focused on the needs of development and expansion for industrial facilities and the heavy duty truck logistical circulations.. Accordingly, we recommend changes to the following policies:

Truck Routes Must Reroute Heavy Duty Trucks and Industrial Traffic away from disadvantaged communities

Policy TR-A.16: Truck Routes, states that “The County shall work with the cities of Fresno County in establishing a system of designated truck routes through urban areas.”

TR-A.16 language needs to be changed and state that,

- **“The County shall work with the cities of Fresno County in establishing a system that will reroute trucks away from urban and residential disadvantaged communities.**
- **The County shall also participate in the city of Fresno’s AB617 truck reroute study and implementation of outcomes as proposed by the community steering committee and that avoid sensitive receptors to the greatest extent feasible.**

Communities of Calwa, Malaga, and South Central Fresno continue to suffer the impacts of air pollution with high concentrations of diesel PM2.5, light and noise pollution, and vibrational impacts due to the heavy duty trucks that drive within 20 feet from the front steps of their homes. The history of the poor planning and inadequate land use determinations created by the County as well as the City of Fresno have completely disregarded the needs and well being of disadvantaged communities of color. Policy TR-A.16 does not state that the County will prioritize the re-routing of heavy duty trucks outside of a community. Instead, it states that it will purposefully work to establish a system through urban areas. Again, there are no indications in the language of this policy that ensure that there will be a decrease in any industrial uses near the sensitive receptors of communities.

- **The circulation diagram needs to be revised to include routes off-limit to trucks based on routes being located within a community and include a policy to enforce prohibition.**
- **The county wide truck routes must minimize exposure to sensitive receptors and prioritize minimizing exposures for communities impacted by high levels of air pollution.**

Land designated for industrial development that is located near sensitive receptors and/or which would require trucks to use roadways with sensitive uses in disadvantaged communities, needs to be rezoned to a less impactful use that will not allow for heavy duty truck traffic.

Policy TR-A.17 Sensitive Land Uses, states that “The County shall limit within Urban Areas the expansion of existing or designation of new truck routes within 500 feet of sensitive land uses such as schools and residential areas.”³⁰ TR-A.17 policy only indicates that expansions of truck routes will only have to go as far as a maximum of 500 feet away from a sensitive receptor. While this is an improvement in comparison to prior language, the distance of 500 feet away from a sensitive receptor will not reduce health impacts when **it actually takes a minimum of 2500 feet from a truck route to begin to see a statistically significant decrease in the exposure to cancer risk from diesel PM2.5.**³¹

In the county’s pursuit of transportation planning through the Central Valley, the FCGP policies must require protections to be built into the language of all of its policies that will improve the quality of life of the communities that are being impacted.

- Policy language must include plans that will actually reduce exposure to air pollution such as diesel PM2.5 by improved rezoning of impact land uses away from sensitive receptors.
- Transportation goals must prioritize funding investments for projects that will create complete streets, improve bike lanes, tree canopy and improved public transit for disadvantaged communities.

IX. The Draft Zoning Ordinance Does not Promote the General Welfare of Fresno County Residents

The purpose of the Zoning Ordinance states that it is, “adopted to protect and to promote the public health, safety, comfort, convenience, prosperity, and general welfare of residents and businesses in the County.” However, several of these goals appear to be forgotten when all

³⁰ Fresno County General Plan pg 2-95

³¹ CARB Freight Handbook: pg 13 Figure 2: Diesel PM Concentration and Associated Cancer Risk

priority is given to developmental growth without consideration of the long standing, existing communities.

In Article 1 Chapter 800.1 (E)(2) (page 1-3) of the Zoning Ordinance, it states that, “ An approved development for which construction has not begun as of the effective date of this Zoning Ordinance or amendment, may still be constructed as approved, as long as construction is diligently pursued, as determined by the Director, before the expiration of an applicable land use permit (Section 868.6.080, Expiration) or, where applicable, before the expiration of an approved time extension. “

This is of concern, especially in the county areas that are within the sphere of influence of the city of Fresno’s South Central area and Malaga and Calwa communities. As the focus of the County continues to be industrial development, these grandfathered permits will allow industrial facilities to be constructed within extremely close proximity to residential communities, without any prior notifications given to the residential property owners and without having to adhere to the Environmental Justice Policies that are being included in this updated General Plan.

This Zoning Ordinance Update must adhere to the Environmental Justice policy goals and any prior approved development projects for which construction has not yet begun must also adhere to the Environmental Justice policy goals.

In Article 2, Chapter 808.2, Agricultural Zones, all Agricultural Zones are written to give specific protections of different types of agricultural uses. However the same amount of protections are not given to residential uses nor to the areas zoned for residential use that are near industrial uses. For example, 808.2.010 (A) is for Exclusive Agricultural zoning which states that this zoning is, “intended to protect agricultural land and provide for those uses which are necessary...and to protect the general welfare of the agricultural community from encroachments of non-related agricultural uses.”

Residential land uses should have the same equal protection from the encroachment of agricultural and industrial land uses, especially from the encroachment of: agricultural land that uses pesticides near communities; agricultural land that has been or is applying for rezoning to heavy and light industrial land uses; and protection from agricultural roads that are being transitioned into high capacity infrastructure build out for the sole purpose of increasing industrial development that will encroach upon residential communities.

Again, the language related to this Zoning Ordinance prioritizes the needs of the agricultural industry over the needs and impacts of communities. Another policy that needs protections in its policy language is Chapter 816.2 on page 2-95. It states that Farmworker housing complexes will be included in special purpose land use zones. While there is a need for more affordable housing options for vulnerable and low income residents, the housing environment must allow

for provisions that will protect people from over exposure to pesticides and dust created within the farmlands.

In Article 3, Table 3-1 shows the Land Use Compatibility for Community Noise Environments.³² It states that the land use category of Residential should not have decibel(dB) uses more than 75dB. It also states that Industrial, Manufacturing, Utilities, Agriculture can be conditionally acceptable with decibel uses starting at 70dB. The present concern is that when these permitted land uses of Residential and Industrial physically abut each other or are too close in proximity to each other, these decibel levels are too high. The County's own language in this diagram of Table 3-1 confirms what community members continue to state, which is that the noise pollution is too high and causes deafness and the inability to have healthy sleep patterns. While noise limitations are adequately addressed in Chapter 820.3.150, there are no safeguards to enforce that the noise limitations and standards will be adhered to and enforced.

In Chapter 820.3.150 - Vibration states that "No use shall generate vibrations that may be considered a nuisance or hazard on any abutting property. " However, the complaints of the community regarding noise and vibration pollution continue to be ignored by the county. The vibrations felt inside the homes cause attention disruption as heavy duty trucks pass by constantly on farm roads that were never meant to carry such massive amounts of weight. **The policy needs to include clear steps in which community members can make complaints when noise levels go beyond a nuisance.**

Chapter 822.3.090 Property Development and Use Standards-Screening and Buffering Section E and F (Table 2-6 and Table 2-8)³³ states that the maximum landscape buffer that is required only has to be 20 feet wide and a 10 foot high cinder block wall when it is 400,000 sq ft or greater. These minimal requirements are even less if the square footage of the facility is less than this square footage. Instead, **these standards should include increased landscape buffers with a minimum of 40 feet wide and a minimum of a 20 foot high cinder block when it is 400,000 sq ft or greater.**

Chapter 826.3.020: Commercial/Industrial/Warehousing Landscaping Standards states that frontage buffers will require a minimum 24-inch box drought tolerant trees. This is not sufficient as this is only a sapling of a tree that will take a minimum of 5 years to even begin to create a green buffer. Developers are only going to submit to the minimum and not go above and beyond for the protection of a community. **Therefore, the required tree size must be larger than a 36 inch box.**

³² Fresno County General Plan Zoning Ordinance pg 3-7

³³ Fresno County General Plan Zoning Ordinance pg 3-25

Chapter 828.3.080: Loading and Truck Parking for Designated Commercial/Industrial Warehousing Development states that (B) “Warehouses or commercial/industrial structures larger than 400,000 square feet in floor area. The building’s loading docks shall be oriented to provide minimal impact to surrounding sensitive receptors and located a minimum of 700 feet away, measured from the nearest property line adjacent to the sensitive receptor “³⁴ While this is an attempt to create mitigations of the vicinity of trucks near sensitive receptors, this distance needs to be a minimum of 2500 ft away from the sensitive receptor based on the importance of decreasing the risk of cancer from PM2.5 diesel exposure.³⁵

While many of these comments and concerns uplifted in the zoning ordinance are very specific in the requests to improve the limitations or the standards allowed, it is because it directly impacts the environmental conditions in which community members continue to have to live in as the county allows for increased industrial growth within their neighborhoods.

X. Draft Public Engagement Policies Fail to Meet their Intended Goals and Objectives

Adequate Public Engagement is essential in ensuring a General Plan meets the needs of residents. The state also requires that the planning agency shall “provide opportunities for the involvement of citizens, California Native American tribes, public agencies, public utility companies, and civic, education, and other community groups.³⁶ Effective public engagement ensures all voices are represented, promoting good governance and avoids conflicting policies or land uses.

Unfortunately, some communities are situated as far as one hour away from where local elected officials meet and are too often left out of important decision making processes. For this reason, it is crucial to have community engagement before, during, and after the General Plan is adopted this Fall. Throughout the General Plan documents the County commits to evaluate different programs and policies periodically and on a yearly basis. Thus, the commitment to engage residents does not end this year. By the County engaging residents in the General Plan update, the new plan can be reflective of community needs and priorities and be shaped by the community. We also know there will soon be a process the County will use to determine which community plan will be updated next. We expect the County to continue to do outreach when this process is completed to inform residents of this update.

Further, the current land use maps included in the general plan and zoning ordinance fail to include a land use map that illustrates land use designations for areas of unincorporated Fresno County which are within the sphere of influence of cities. Other included maps do not assign

³⁴ Fresno County General Plan Zoning Ordinance pg 3-73

³⁵ CARB Freight Handbook: pg 13 Figure 2: Diesel PM Concentration and Associated Cancer Risk

³⁶ Government Code 65351

land designation for these areas either. Without a clear map, the GPR/ZOU fails to comply with Gov Code § 65302(a) which requires a plan to designate the general location and extent of land uses. Without its inclusion, residents are unable to accurately and easily interact and engage with General Plan amendments.

OPR guidelines also state the, “State law requires the local planning agency to provide opportunities for the involvement of the community”³⁷ We have attended past workshops when the County first began the process to update the General Plan and have continued to attend the most recent workshops the past two months. It should be evident that we want to continue to be included and see our feedback taken into consideration once the current General Plan documents are updated before adoption. Keeping this in mind, this is not the case for everyone in the County. There are residents who may not be aware of the workshops or that the County is undergoing this process. We recommend the County work with local organizations, agencies, water districts, etc to help spread the word and mail out this information to those who do not use social media or email. The County needs to make sure that the material and flyers are created in primary languages including, but not limited to, Spanish, Hmong, and Punjabi. These points need to be added to **policy EJ-E.4** where it simply states the diversity of the County will be taken into consideration when developing material.

In addition to the General Plan workshops, **Policy EJ-A.8** states that “The County shall provide residents within disadvantaged communities the opportunity to review and comment on discretionary development projects within their communities.”³⁸ The County should update this policy to include how far in advance residents can expect to be notified and how they will be notified.

We urge the County to be intentional about conducting outreach and including Fresno County residents in current and future processes. It is imperative that the County include community’s feedback and not treat it simply as a task that needs to be completed.

XI. Conclusion

Thank you for your consideration and time in reviewing our letter. We look forward to the County incorporating our recommendations in the final General Plan documents. The County has the ability to positively impact the future of Fresno County and must keep community concerns in mind when creating policies and programs. We urge the County to be intentional and proactive about including all communities but especially historically disinvested communities.

³⁷ OPR Guidelines, Chapter Community Engagement and Outreach, pg 26

³⁸ Fresno County Draft Policy Document, pg 2-204

Sincerely,

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South Fresno Community Alliance

Comunidades Unidas por un Cambio

Cantua Creek y El Porvenir Prioridades

Tombstone Territory Por Un Futuro Mejor

Lanare y Riverdale Trabajando Por Cambios

