

Exhibit L



February 2, 2021

(Electronic Transmission)

Ms. Jennifer Clark

Director of Planning and Development

City of Fresno, Planning Division

2600 Fresno Street

Fresno, CA 93721

## Memo of Concern

**RE: ID-21-206 Consideration of Plan Amendment Application No. P20-01665, Rezone Application No. P20-01665 and the related Environmental Assessment No. P20-01665 pertaining to +92.53 acres of property bounded by East Vine Avenue to the North. State Route 41 to the East. South Elm Avenue to the West and East Chester/ East Samson Avenue (alignment) to the South (Council District 3)**

Dear Ms. Jennifer Clark:

Thank you for the opportunity to provide comments on the City of Fresno's Consideration of Plan Amendment Application No. P20-01665, Rezone Application No. P20-01665 and the related Environmental Assessment No. P20-01665 pertaining to ±92.53 acres of property bounded by East Vine Avenue to the north, State Route 41 to the east, South Elm Avenue to the west and East Chester/East Samson Avenue (alignment) to the south (Council District 3).

1. RECOMMEND ADOPTION (to the City Council) of the Addendum to Final Program EIR (SCH No. 2017031012) for the Southwest Fresno Specific Plan, dated January 15, 2021 for the proposed project pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15164.

2. RECOMMEND APPROVAL (to the City Council) of Plan Amendment Application No. P20-01665 proposing to amend the Fresno General Plan and the Southwest Fresno Specific Plan to change the planned land use designation for the subject

The Project site is 92.53 acres surrounded on three sides by communities of color that are already exposed to high levels of pollution. The City of Fresno's Southwest Fresno Specific Plan has found significant and unavoidable impacts to air quality and greenhouse gas emissions. Despite these impacts,

the Project in question includes minimal mitigation, and it omits over a dozen measures required by a Final Environmental Impact Report for the City's General Plan (General Plan FEIR). In addition, the Southwest Fresno Specific Plan analysis of air quality and noise impacts, have yet to be mitigated.

We respectfully submit these comments urging the City of Fresno to adopt all feasible air quality and greenhouse gas emission mitigation, including all applicable measures required by the General Plan FEIR, and to correct its California Environmental Quality Act (CEQA) analysis of air quality and noise impacts.

Under California state law: "[E]nvironmental justice" means 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. (Gov. Code, § 65040.12, subd. (e)).

To be clear, Fairness in this context means that the benefits of a healthy environment should be available to everyone, and the burdens of pollution should not be focused on sensitive populations or on communities that already are experiencing its adverse effects.

In Community,

Eric Payne  
Executive Director  
The Central Valley Urban Institute

CC:

City of Fresno Planning Commission  
City of Fresno City Council  
City of Fresno City Manager's Office  
California State Attorney General: Department of Environmental Justice

