

Exhibit N

March 9, 2021

Planning Commission  
2600 Fresno St.  
Fresno, Ca 93721

<sent via email>

**Request for Denial of Plan Amendment Application No. P20-01665**

Dear Planning Commissioners,

We respectfully request that the Planning Commission deny the Plan Amendment Application No. P20-01665. This plan amendment does not comply with the intent and vision of the Southwest Fresno Specific Plan. It is also not consistent with the General Plan goals and policies, and the addendum to the Program Environmental Impact Report is inadequate.

Those who have signed on to this letter either live in Southwest Fresno or work in partnership with community leaders on various issues such as affordable housing, essential services, and the right to live free from industrial pollution with infrastructure that supports healthy lifestyles.

Historically, the City of Fresno has used its city's southern region as its dumping grounds for any type of land use that is not "deemed" appropriate for its segregated northern Fresno communities, where affluent Caucasian citizens are the primary demographic. This City's segregation is no accident as this country's history of redlining, as well as discriminatory investment and development practices, have created the tale of two cities we have today. As the city tries to right its racially divided and historical wrongs of the past, the Southwest Fresno Specific Plan emerged. It created a twenty-one member steering committee and engaged hundreds of community members. Throughout the two-year process, the committee and the community specifically stated that the heavy and light industrial land uses must stop being placed next to and within their African-American, Latino, and Hmong communities.

According to the CalEnviroScreen 3.0<sup>1</sup>, a statewide tool evaluating socio-economic, public health, and pollution burden, Southwest Fresno ranks in the top 1% of city census tracts of the most polluted, heavily burdened areas with poor health outcomes in the state. Yet, this city's only priority continues to focus on the economic goals by way of industrial growth rather than a comprehensive approach balancing quality jobs with upward mobility and creating healthy, complete communities. The argument of more jobs regardless of the source as the only solution is not and has not been the answer for improving the Southwest Fresno community. Jobs without living wages and benefits, upwards mobility, community benefits agreements, and without proven mitigation measures will only continue to increase the equity gaps in health and wealth of communities of color. The City of Fresno should plan economic growth that will uplift Southwest Fresno and not continue to propose or approve land-use decisions that sacrifice the lives of communities of color.

<sup>1</sup> <https://oehha.ca.gov/calenviroscreen/maps-data>

The proposed amendment's findings of the Fresno Municipal Code wrongfully states the changes "seem to comply with the intent of the Vision for the SWSP." Changing the zoning to Light industrial from Neighborhood Mixed Use does not comply with the vision nor the guiding principles of the SWSP, Chapter 2 (Vision), Subsection B (Guiding Principles) of reducing, monitoring, and mitigating negative impacts of industrial uses; nor does it comply with prohibiting new industrial

development; nor relocating new industrial development away from residential neighborhoods.

This plan amendment does the exact opposite of the stated purposes within the SWSP. Chapter 2 (Vision), Subsection B (Guiding Principles) of the SWSP states a guiding principle of increasing transparency and communication between government agencies, residents, and stakeholders. Upon reviewing the initial Public Hearing Notice Radius map, the planning department did the bare minimum of giving public notice to those within 1,000 feet of the planned zoning change. At 1,100 feet west of the project area lies the West Fresno Elementary and Middle schools and the beginning of two residential neighborhoods. Yet, these communities were not notified that the SWSP they engaged in is at risk of reverting to its former unwanted zoning.

After the February 3, 2021 Planning Commission hearing, the Planning Commission directed the applicant to go back to the community and conduct true community outreach to receive the input from community members. Again, the outreach was minimal and only a one time community meeting was scheduled for March 1st. Any zoning amendments to the Southwest Fresno Specific Plan must engage and outreach to the entire community, not just the 500 homes surrounding this project area within 2000 feet.

The stakeholders and community members of the SWSP fully understand the importance of a sound and vibrant economy for the city of Fresno and southwest Fresno. However, a generalized rezone of 92 acres, or any rezone would forgo the Southwest Fresno Specific plan's ability to continue to hold industrial development accountable. These businesses must work towards creating fewer to no impacts on the citizens that call Southwest Fresno home. The businesses within this area that were initially classified as light or heavy industrial zoning before the Southwest Fresno Specific Plan update, can still operate at their current capacity.

The purpose of Neighborhood Mixed-use in the SWSP not only limits the future unhealthy environmental impacts on the community 1,100 feet away, but it also allows for the planning and investment in businesses that serve this community, like a grocery store in a food desert. To change zoning to Light and future Heavy Industrial zoning opens this area of Southwest Fresno back up to the perpetual racist 'dumping' of high polluting industry on a community that is predominantly made up of citizens of color.

Moreover, an addendum for this project is inappropriate because the changes of a rezone from Neighborhood Mixed-Use to Light Industrial are more than technical and minor and have consequential health impacts on the neighborhoods and schools near it. The addendum to the the final PEIR confirms that the San Joaquin Valley Air Pollution Control District (SJVAPCD) finds that the air quality is out of extreme nonattainment based on the Federal standards. Yet this PEIR also counter-intuitively states that no significant impact will result from rezoning an area to Light Industrial, which will by definition cause more allowable polluting factors than Neighborhood Mixed Use zoning.

For the Planning Commission to adopt the addendum to the Final Program Environmental Impact Report for the Southwest Fresno Specific Plan would be an egregious and blatant racist decision and an insult to the work that the residents and stakeholders of this city have put into the Southwest Fresno Specific Plan.

It has already been proven that if you live in southwest Fresno, your life expectancy is 20 years less than the citizens that live in north Fresno<sup>2</sup>. A change of the current zoning, as proposed by the applicant would only serve to perpetuate the conditions that have created this disparity in health, wealth and wellness.

**We urge both the Planning Commission and City Council to vote no on this proposal.**

Sincerely,

**Pastor B.T. Lewis**

Rising Star Missionary Baptist Church  
Concerned Citizens of Southwest Fresno

**Debbie Darden**

Chair, Golden West Side Planning Committee

**Mary Curry**

Chair, Concerned Citizens of Southwest Fresno

**Venise Curry, M.D.**

Concerned Citizens of Southwest Fresno

**Bob Mitchell**

Vice Chair, Golden West Side Planning Committee  
Concerned Citizens of Southwest Fresno

**Ivanka Saunders**

Leadership Counsel for Justice and Accountability

<sup>2</sup> <https://www.naphsis.org/usaleep>