



June 5, 2025

Mr. Sandy Roper, Chief Planner
Special Projects Division
Economic Development & Planning
County of Tulare Resource Management Agency
5961 S. Mooney Boulevard
Visalia, CA 93277

RE: City of Visalia comments and opposition to PRC 25-028: A request by Smees Homes, Inc. to Rezone 29.79 Acres from AE-20 to R-1 and Subdivide Site into 127 Lots.

Dear Mr. Roper,

Thank you for forwarding the PRC 25-028 materials regarding the potential rezone of a 29.79-acre site from AE-20 (Exclusive Agricultural – 20 Acre Minimum Parcel Size) to R-1 (One Family) and associated Tentative Subdivision Map requesting to subdivide said project site into a 127 lot single-family residential subdivision on property located on the south side of West Visalia Parkway, just south of the County Center/Visalia Parkway intersection (APN: 121-610-001).

The project site (APN: 121-610-001), and as noted in the PRC documentation, is located within the City's Planning Area Boundary and Urban Development Boundary Growth Tier 3 and has a General Plan land use designation of Low Density Residential as identified in the City's 2030 General Plan. The site is eligible to be annexed into the City of Visalia only after the threshold to permit residential development in Tier 3 has been met. The City continually monitors its progress toward meeting the Tier 3 threshold and anticipates that the threshold will be met in the next several years. Urbanized development under the County purview undermines the ideology of the City's growth boundaries and would foster urban development that lacks adequately planned city-grade sewer infrastructure/facilities to accommodate this development's request.

As stated in previous comment letters issued by the City of Visalia related to the County's processing of land use entitlements within our SOI and urban development growth boundaries, the City of Visalia expresses our formal opposition to this project and Tulare County's continued consideration of urban-scale development in areas that undermine the City of Visalia's General Plan. Urbanization of areas that are not ready for this type of development promotes leapfrog development, contributing to sprawl, increased vehicle miles traveled, and environmental degradation. The City of Visalia strongly supports the principles of smart growth, sustainable land use, and coordinated regional planning efforts. Supporting entitlements to facilitate urban-scale development within the City's General Plan urban development boundary area weakens these principles and presents significant long-term challenges when efforts are made to undermine the City's General Plan policies regarding concentric growth and the City's monetary resources related to the City's Capital Improvement Program that help in the coordination of major infrastructure needs throughout the entire city.



Approval of this request would result in inefficient provisions for adequate urban services, including water, sewer, law enforcement, fire protection, and transportation infrastructure, which are best provided by incorporated cities that are structured and resourced for these demands. It is also the City of Visalia's understanding that the use of on-site septic systems will be needed to accommodate this residential development, as the City would not support connection to the City's wastewater treatment plant via a request for an Extraterritorial Sewer Agreement, which is seen as an effort to circumvent the City's General Plan land use policies and regulations. The City of Visalia has several concerns with the use of on-site septic systems being used for a residential development of this caliber given that the primary source of drinking water for Visalia residents comes from ground water, and the use of septic systems needed to accommodate this residential development could potentially lead to ground water quality issues for the area in the future.

The City of Visalia requests Tulare County staff to uphold their commitment to sound planning practices by not supporting this request, and to direct the property owner to seek development under the City of Visalia where services and infrastructure exist and where residents have access to a full range of public resources. Staff contends there are suitable alternative sites in the current Urban Development Growth Tier 2 boundary to facilitate similar residential development. Seeking residential development in the Tier 2 boundary maintains consistency with the City's land use standards to prevent leapfrog development.

If this project is to proceed further, the City of Visalia hereby requests to be included in the distribution of all pertinent public hearing notices and/or actions related to this project. A City representative will be present during the proceedings to assist as appropriate. Please do not hesitate to contact me at (559) 713-4025, for any follow-up coordination in this matter.

Thank you for your attention and consideration.

Regards,

Paul Bernal, Director
Planning and Community Preservation Department
City of Visalia

cc:

Visalia City Council – via e-mail
Leslie Caviglia, City Manager – via e-mail
John Lollis, Assistant City Manager – via e-mail
Ken Richardson, City Attorney - via e-mail
James Koontz, City Attorney - via e-mail
Brandon Smith, Principal Planner – via e-mail

Attachment: Project Review Consultation Notice