

# Planning Commission

May 20, 2025



## Information Packet

### ITEMS

#### **File ID 25-657**

Public hearing to consider the adoption of the Southeast Development Area Specific Plan and related Final Environmental Impact Report, State Clearinghouse (SCH No. 2022020486). The following applications have been filed by the City of Fresno and pertain to approximately 9,000 acres in the Development Area-3 Southeast and Development Area-4 East.

#### **Contents of Supplement:**

*Supplemental Exhibit N* – Comment Letters Received from the Public

#### **Supplemental Information:**

Any agenda related public documents received and distributed to a majority of the Commission after the Agenda Packet is printed are included in Supplemental Packets. Supplemental Packets are produced as needed. The Supplemental Packet is available for public inspection in the City Clerk's Office, 2600 Fresno Street, during normal business hours (main location pursuant to the Brown Act, G.C. 54957.5(2)). In addition, Supplemental Packets are available for public review at the Planning Commission meeting in the City Council Chambers, 2600 Fresno Street. Supplemental Packets are also available online on the City Clerk's website.

#### **Americans with Disabilities Act (ADA):**

The meeting room is accessible to the physically disabled, and the services of a translator can be made available. Requests for additional accommodations for the disabled, sign language interpreters, assistive listening devices, or translators should be made one week prior to the meeting. Please call City Clerk's Office at 621-7650. Please keep the doorways, aisles and wheelchair seating areas open and accessible. If you need assistance with seating because of a disability, please see Security.

*Supplemental Exhibit N*



May 18, 2025

Fresno City Planning Commissioners

The Fresno League of Women Voters opposes approval of the plans for buildout of the Southeast Development Area. One of the basic elements of our natural resources position is to “preserve agricultural land, reduce the need for expanded service areas, and encourage population densities that support mass transit.”

SEDA is being proposed without consideration of existing alternatives for the city to provide housing in ways that would support all of those ambitions. Additionally, the description of its compliance with Rezone Plan Amendments A, B, and C glosses over and misstates the real impacts of the project and neglects any analysis of the direct infrastructure costs and the indirect cost of diverting limited resources away from the city core.

Criteria A: Expanding the economic base and fiscal sustainability. The project imagines speculative, time-indeterminant returns from expansion of “the economic base of the city.” There is no current value estimate of that potential value. In addition, there is no consideration of where that business is likely to come from. Some or most of it may represent a move of businesses away from the core, providing no new return and undermining downtown and other core area plans.

Worse, in that section is the following statement: “one of the key elements within the Specific Plan is to achieve fiscal responsibility by providing a self-financing mechanism for the development and maintenance of the Southeast Development Area.” Where is that “self-financing mechanism”? The intent to provide a plan for fiscal responsibility does not make SEDA fiscally responsible.

Mobility and Transportation: Throughout this analysis, the emphasis is on transportation within the SEDA area, assuming a degree of self-containment that is unrealistic. Governmental agencies, universities, and retail shopping are all concentrated and will continue to be located at a distance from SEDA, requiring more attention in this document to the obvious increases in transit to and from the city core. This plan does not reduce transit or its associated VMT, air quality impacts, and greenhouse gas emissions as addressed in the Resource Conservation and

Resilience section. There is no mention at all of the air and greenhouse gas impacts of the buildout of this area—the dust of the construction or the truck transportation. There is also no discussion of the usurpation of ag land or the impact that paving over that undeveloped land will have on our climate and air quality.

Public Utilities and Services: This section adequately describes the infrastructure planning and construction to occur prior to new development in the SEDA and to serve that area. But, there is no analysis of the cost-benefit to the city of providing such planning and construction, the ability of the city to do so, or the impact on the rest of the city if resources are devoted to these uses.

Criteria B. The change is consistent with the purpose of the Development Code to promote the growth of the city in an orderly and sustainable manner and to promote and protect the public health, safety, peace, comfort, and general welfare:

The devotion of effort to the livability of this new area and not the “general welfare” of the core of Fresno is a notable feature of SEDA planning. There is more than adequate land to meet new housing needs in the area west of 99 and in the core of the city where infrastructure already exists. The “general welfare” of the city is not addressed in this document or in any of the planning for this area. The Planning Commission should vote against any further consideration of this plan.

Kay Bertken  
Co-president, League of Women Voters of Fresno

May 21, 2025

Peter Vang, Chair  
Planning Commission  
City of Fresno  
2600 Fresno Street, Room 3043  
Fresno, CA 93721

**Submitted Electronically**

ATTN: Jennifer Clark, Planning Director  
[PublicCommentsPlanning@fresno.gov](mailto:PublicCommentsPlanning@fresno.gov)

**RE: SUPPORT: ID 25-657 – Southeast Development Plan Area Specific Plan**

Dear Chair Vang and Members of the Planning Commission:

On behalf of INVEST Fresno, a coalition of residents, businesses, and community organizations committed to building a diverse and sustainable economy in Fresno, I write to express our support for the goals outlined in the Southeast Development Area Specific Plan (“SEDA”) and to provide input on the Recirculated Draft Environmental Impact Report (“RDEIR”) currently under consideration.

We commend the City of Fresno for its bold vision to bring 45,000 new homes and 37,000 jobs to the plan area by 2050. This long-range planning effort represents a significant opportunity to promote job creation, economic growth, and neighborhood revitalization across Southeast Fresno. The emphasis on employment-generating uses, infrastructure investment, and housing development aligns with INVEST Fresno’s mission to expand opportunity and improve quality of life for all residents.

We see strong potential in the Flexible Research and Development (FRD) designation to support a dynamic mix of job-generating uses. To fully realize that potential, we encourage the City to consider ways to ensure the FRD district is inclusive of modern manufacturing and industrial uses that align with today’s innovation-driven economy. These industries not only offer good-paying jobs but also attract long-term private investment that strengthens our tax base and community services.

By streamlining the process for compatible manufacturing uses—particularly in zones like Regional Business Park and Business Park—the City can help unlock new opportunities for job creation and business growth. Clarifying and expanding by-

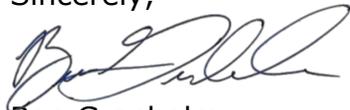
right uses within the FRD designation can send a strong signal that Fresno is ready to welcome diverse, forward-looking industries that contribute to a vibrant, inclusive local economy.

Including opportunities for Light and Heavy Industrial uses within the plan area presents a valuable chance to meet growing demand for industrial space and position Fresno as a regional hub for job-creating industries. As industrial vacancy remains low and interest from employers continues to rise, incorporating a thoughtful mix of industrial land uses can help capture new investment, support long-term economic growth, and strengthen the city's competitive edge in attracting and retaining high-quality employers.

We believe the City has a unique opportunity with the SEDA to thoughtfully balance residential growth with robust employment opportunities and tax-generating land uses. A strong industrial and employment component within the plan will support Fresno's fiscal sustainability, provide career-pathway jobs for local residents, and ensure that public services—from parks to public safety—have the resources they need to thrive.

INVEST Fresno remains a committed partner in helping realize the City's economic development goals. We are encouraged by the City's progress and leadership and look forward to continued collaboration as the plan moves forward. Should you have any questions or wish to discuss further, please contact Ben Granholm at [info@INVESTFresnoCA.com](mailto:info@INVESTFresnoCA.com).

Sincerely,



Ben Granholm  
Executive Director



Ethan Smith  
Chairman

cc: Jerry Dyer, Mayor  
Georgeanne White, City Manager  
Councilmembers, City of Fresno

To: City of Fresno  
Planning and Development Department

May 21, 2025

From: Mark and Dale Reitz  
246 E. Denise Ave.  
Fresno CA 93720  
Markreitz1@aol.com

Comments to Agenda Item VIII B- ID 25-657 for Planning Commission Hearing on Recirculated Draft Program EIR for Fresno Southeast Development Area Specific Plan Project

We would like to congratulate and thank the city of Fresno for their work in preparing this significant document and moving towards adoption of a Specific Plan for the Southeast Development Area that has been discussed and anticipated since 2007. As long-time property owners of a family home and farm within this area for over 100 years at 1080 S. Temperance (east of Temperance between the Railroad and Church Avenues), we and our neighbors welcome the opportunity to finally provide input to this Plan and hopefully provide local perspective to responsible growth and for the benefit of the city of Fresno for years to come.

We have watched the city grow to the southeast over the past 50 years, and we are excited for a well-planned and responsible expansion of Fresno. Currently, there are three new major residential subdivisions directly across the street from our farm property on Temperance Ave as well as a new Sanger Unified High School at Jensen and Fowler and a planned new elementary school on the west side of Temperance Avenue just eighth of a mile south of our property.

We and our neighbors have attended numerous planning meetings and public presentations. We have offered our written recommendations and alternative maps regarding land use planning in our area going back to 2007. (For over 18 years and at numerous meetings and presentations by the City). These documents have been passed on to various members of the Fresno Planning Department staff who have been very gracious in reviewing them and providing further direction to us on how we should submit our recommendations and input.

However the current Land Use Map is the same map that was presented by the original EIR consultant (Calthorpe) back in 2006 with virtually no changes. We were essentially told to follow the development of this PEIR and to provide our input to the original land use map that was proposed back in 2006 (almost 20 years ago) and no changes would be made to it during this preparation period and that we need to provide our input to the City Planning Department and to the Planning Commission and City Council during the adoption period.

**Below are a few of the justifications we presented in our prior letters and documents for relocating a portion of the Land Use Plan Area bounded by Temperance Ave. to the west, Church Ave. to the south, the Briggs Canal to the east, and the Railroad to the north, from Flexible Research and Development/Regional Business Park to a mixture of Community Center, Mixed Residential, and Neighborhood Residential. We request this change or some version of it for the reasons outlined in the documents previously submitted and summarized below. Also, considering there is a serious shortage of housing in Fresno and California this change should be desirable.**

- The Sanger Unified School District has recently purchased and zoned a 15-acre parcel on the west side of Temperance about midway between the Railroad and Church Ave. This school as well as the new High School at Jensen and Fowler Avenue would benefit by having more residential homes and apartments closer to these schools to reduce car miles driven and allow walking to school.
- A community center, a small commercial center, and similar job-creating uses at this site will serve the proposed residential and mixed residential areas as well as the very large residential areas (4 square miles) to the west of Temperance between Kings Canyon Road and Jensen Avenue. Currently there are no shopping/commercial areas for over 3 driving miles to the Kings Canyon/Clovis Avenue center. Adding a small community center/office/commercial center and some mixed residential would greatly reduce trip miles, air pollution, and noise. These uses would not conflict with the large community center proposed at DeWolf and California Avenue and would complement it by reducing trip miles between shopping/office space needed in both areas. The proposed four-lane California Avenue would support both developments and conveniently connect the Temperance and DeWolf arterial streets for both bicycle and foot traffic.
- There is significant pressure/demand on this area to develop employing these land uses due to the SR 180 Freeway completion. Temperance Avenue will be a major connector between SR 180 and Jensen Avenue for communities to the south and east such as Sanger, Del Rey, Reedley, Parlier, and Selma. There are no services, such as gas stations, grocery stores, drug stores, restaurants, etc., to serve this traffic volume. The streets and large community centers proposed over a mile to the east will not develop for 20 to 30 years or more and will not be able to serve the immediate needs. This inconvenient situation will create more trip miles, air pollution, and noise.
- More jobs will be created by the uses we proposed compared to the Business Park/Flexible R&D land uses. If these proposed Business Park lands develop in this area in the distant future, it would be primarily warehouses, storage areas, or agricultural-related processing industries. There are already many large industrial areas in the Fresno area along Jensen Avenue to the west, at the Fresno airport only 5 miles away, and in Clovis. There is no demand in this area for such land use, and it would cause this area to develop last, if ever.

**By making this area Flexible R&D, it will essentially stop or severely slow development of this area and cause development to leapfrog over to areas east of the Briggs Canal. This would cause an expensive and undesirable situation for City services, such as roads, water, sewer, storm drainage, gas, and electrical, to be extended far to the east without development west of the Briggs Canal. Stranded areas of land development are sure to cause unnecessary environmental impacts, future inconvenience, and wasted money.**

- The industrial area to the north of the railroad at Temperance up to Butler Avenue is primarily an agricultural/wet industry (La Destria, formerly Bonner Packing). This is a significant industrial development that has existed for over 150 years at this large site. Zoning of Business R&D may not be consistent with this existing use due to significant odors, noise, rail (double rail spur), truck traffic, and similar environmental impacts. We suggest that this entire area north of the railroad up to Butler Avenue be kept as industrial only. The railroad would provide a good buffer and transition to the community center/office/Mixed Residential uses we are proposing.
- If it is necessary to have a certain number of Industrial or Business Park/Flexible R&D acres in the plan, we suggest moving this zoned area to south of Jensen Avenue and west of Temperance Avenue. The present plan shows some residential in these areas, which would be an environmentally unsound choice due to the heavy traffic noise, and air quality impacts created by a future six-lane roadway such as Jensen Avenue. An example of this undesirable situation can now be found on the north side of Jensen between Clovis and Fowler Avenues, where homes are being built adjacent to this busy highway.
- **As evidenced by our previously proposed application in 2008 for this modification, over 70 percent of the property owners (17 parcels) in this area do not want the Industrial/Flex R&D zoning in this area.** These property owners have owned and paid taxes on these properties for many years, in some cases over 75 years. Many of the parcels are small (less than 10 acres) and are not conducive to developing the larger parcels necessary for Business Park/Flexible R&D, which would further hamper the sales and development of the area for these uses. This condition would promote further leapfrogging over this area.
- The Phasing of Development shown as Exhibit 6 provided at the May 3<sup>rd</sup> 2022, public meeting showed our area to be developed third of four phases. We disagree with this phasing order and feel the area shown as third should be second and the area shown as second moved to third. The area south of Jensen is entirely agricultural now with no major roads completed other than Jensen Ave. There are also no utilities extended near this area. Development of this area would be much more expensive and cause additional deleterious environmental impacts. The State Center Community College is no longer planned for this area, so there is no reason for the land to be developed before the area east of Temperance Avenue between SR 180 south to Jensen Ave. The latter area is already developing due to the new Freeway and the near future extension of Temperance Ave as a super arterial. Also,

the new Southeast Fresno regional water treatment plant is just to the northwest and can be used to bring water to this area more economically. We would appreciate your consideration in this logical and environmentally sound change if phased development of the SEDA area is proposed.

In reading Chapter 5 of the Recirculated Draft Program EIR prepared by the City of Fresno, the city considered various Land Use Alternatives. One of these, listed as **Alternative 2, Consolidated Business Park Alternative**, is described as follows:

*Under the **Consolidated Business Park Alternative (Alternative 2)**, the SEDA Specific Plan would occur as planned, but this alternative maintains the Flexible Research and Development land designations from the General Plan for the area south of Jensen Avenue. It would accommodate approximately 42,900 homes and 36,000 jobs within the 9,000-acre planning area. This is approximately 2,100 fewer homes and 1,000 fewer jobs, when compared with the proposed project. Alternative 2 would have slightly less density of development than the proposed project. The area identified in the SEDA Specific Plan as Flexible Research and Development to the east of Temperance Avenue and north of Jensen Avenue would be developed as Neighborhood Residential and Mixed Residential with two community centers and five neighborhood centers. Additionally, this alternative would change the land use designations for the planned Mixed Residential and Neighborhood Residential, along with the Community and Neighborhood Centers south of Jensen Avenue. Under Alternative 2, that area would be designated as Flexible Research and Development and Offices. **Please refer to Exhibit 5-1 for a visual representation of this alternative.***

The Exhibit 5-1 Land Use Map is enclosed with this letter as well as **Exhibit 1-1 which is the called the “Proposed Project”** in this document. This “Proposed Project” is the same land use document that has been unchanged since the original work on SEGA plan was done in 2007.

**The Alternative 2, Consolidated Business Park Alternative, essentially agrees with what we and our neighbors have been proposing since 2008, and we are extremely pleased that it was analyzed to the same degree as the “Proposed Project” in the Draft EIR.** The results of this analysis, as described in detail in Chapter 5, were determined to be an **environmentally superior alternative** as compared to the “Proposed Project” when all aspects are considered. This determination was illustrated in **Table 5-1** of the Recirculated Draft Program EIR and is enclosed with this letter. Below are excerpts from the Recirculated Draft Program EIR that reflect this determination as well as the project objectives related to new dwelling units and jobs.

## **5.2 - Project Objectives**

As stated in Chapter 2, Project Description, the objectives of the proposed project are to:

### **Quantified Objectives**

- Accommodate between 40,000 and 45,000 dwelling units of varying types, sizes, densities,

and affordability levels.

- Accommodate between 30,000 and 37,000 jobs.

## **5.6 - Environmentally Superior Alternative**

**CEQA Guidelines Section 15126(e)(2) requires identification of an environmentally superior alternative. If the No Project Alternative is environmentally superior, CEQA requires selection of the “environmentally superior alternative other than the No Project Alternative” among the project and the alternatives evaluated. The qualitative environmental effects of each alternative in relation to the proposed project are summarized in Table 5-1.**

### **Land Use and Planning**

Alternative 2 would have slightly less density than the proposed project. **Alternative 2 would not physically divide an established community. This alternative would allow for planned development and growth and would increase connectivity and support, strengthen, and connect new communities.** However, this alternative might reduce impacts to land use by consolidating Office Center and Flexible Research and Development land uses to the area south of Jensen Avenue. **Therefore, impacts to land use would be expected to be less than significant, similar to but slightly less than the proposed project.**

## **5.6 - Environmentally Superior Alternative**

**“The Consolidated Business Park Alternative is the environmentally superior alternative because it has similar, but slightly less, impacts as compared to the proposed project and meets the project objectives.”**

In summary we wish to thank the city and city staff for allowing us and our neighbors to comment on the Recirculated Draft Program EIR. For the reasons stated above and also as stated in your own Recirculated Draft Program EIR, **we request that the Consolidated Business Park Alternative (Alternative 2), be adopted as the preferred land use plan and be adopted as such.** We hope that the City Planning Department and the City Planning Commission will make this recommendation to the City Council for adoption based on the desires of the property owners in this area as well as the analysis performed by their EIR consultant in accordance with the CEQA process.

## 5.6 - Environmentally Superior Alternative

CEQA Guidelines Section 15126(e)(2) requires identification of an environmentally superior alternative. If the No Project Alternative is environmentally superior, CEQA requires selection of the “environmentally superior alternative other than the No Project Alternative” among the project and the alternatives evaluated. The qualitative environmental effects of each alternative in relation to the proposed project are summarized in Table 5-1.

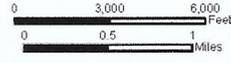
**Table 5-1: Summary of Alternatives**

Environmental Topic Area	Alternative 1: No Build Alternative	Alternative 2: Consolidated Business Park Alternative	Alternative 3: Farmland Conservation Alternative
Aesthetics, Light, and Glare	<=	<=	<=
Agricultural Resources and Forestry Resources	<=	<=	<=
Air Quality	<=	<=	<=
Biological Resources	<=	<=	<=
Cultural Resources and Tribal Cultural Resources	<=	<=	<=
Geology, Soils, and Seismicity	<=	<=	<=
Greenhouse Gas Emissions	<=	<=	<=
Hazards and Hazardous Materials	<=	<=	<=
Hydrology and Water Quality	<=	<=	<=
Land Use and Planning	<=	<=	>
Mineral Resources	<=	<=	<=
Noise	<=	<=	<=
Population and Housing	<=	<=	<=
Public Services	<=	<=	<=
Transportation and Traffic	<=	<=	<=
Utilities and Service Systems	<=	<=	<=
Wildfire	<=	<=	<=
<p>Key:                      Impact finding is the same as the proposed project: =                      Impact finding is the same as the proposed project but slightly less impactful: &lt;=                      Impact finding is the same as the proposed project but slightly more impactful: &gt;=                      Impact finding is less than the proposed project: &lt;                      Impact finding is greater than the proposed project: &gt;                      Source: FirstCarbon Solutions (FCS) 2022.</p>			

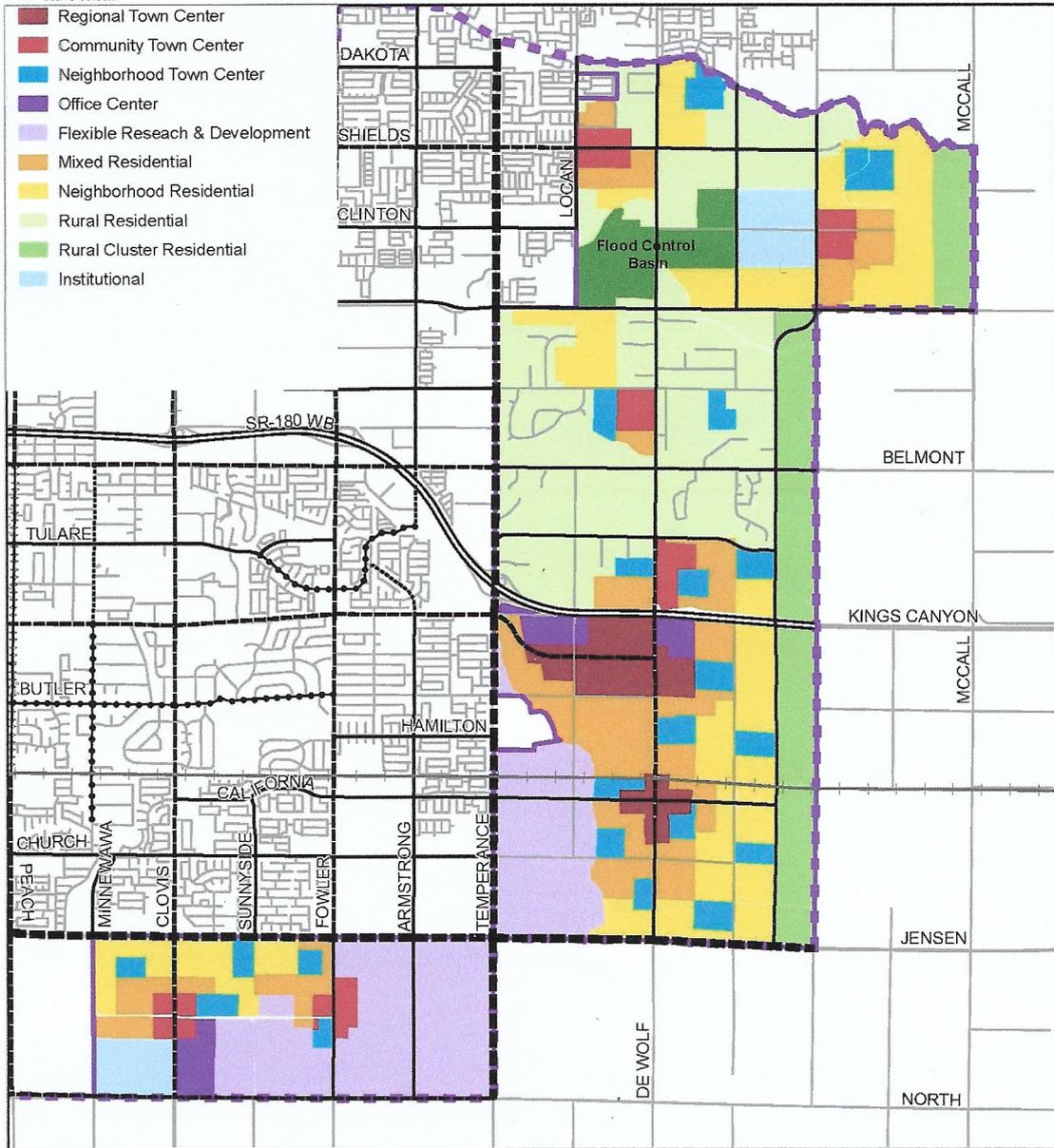
**SEDA PROPOSED LAND USE MAP**

Southeast Development Area

- Freeway
- Expressway
- Scenic Expressway
- Super Arterial
- Arterial
- Scenic Arterial
- Scenic Drive
- Collector
- Scenic Collector
- Southeast Development Area
- Fresno Sphere of Influence
- Major & Local Roads
- Railroads



Source: City of Fresno, SEDA Illustrative Plan derived from community and stakeholder meetings.

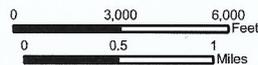


**Map 2.5 SEDA Proposed Land Use**

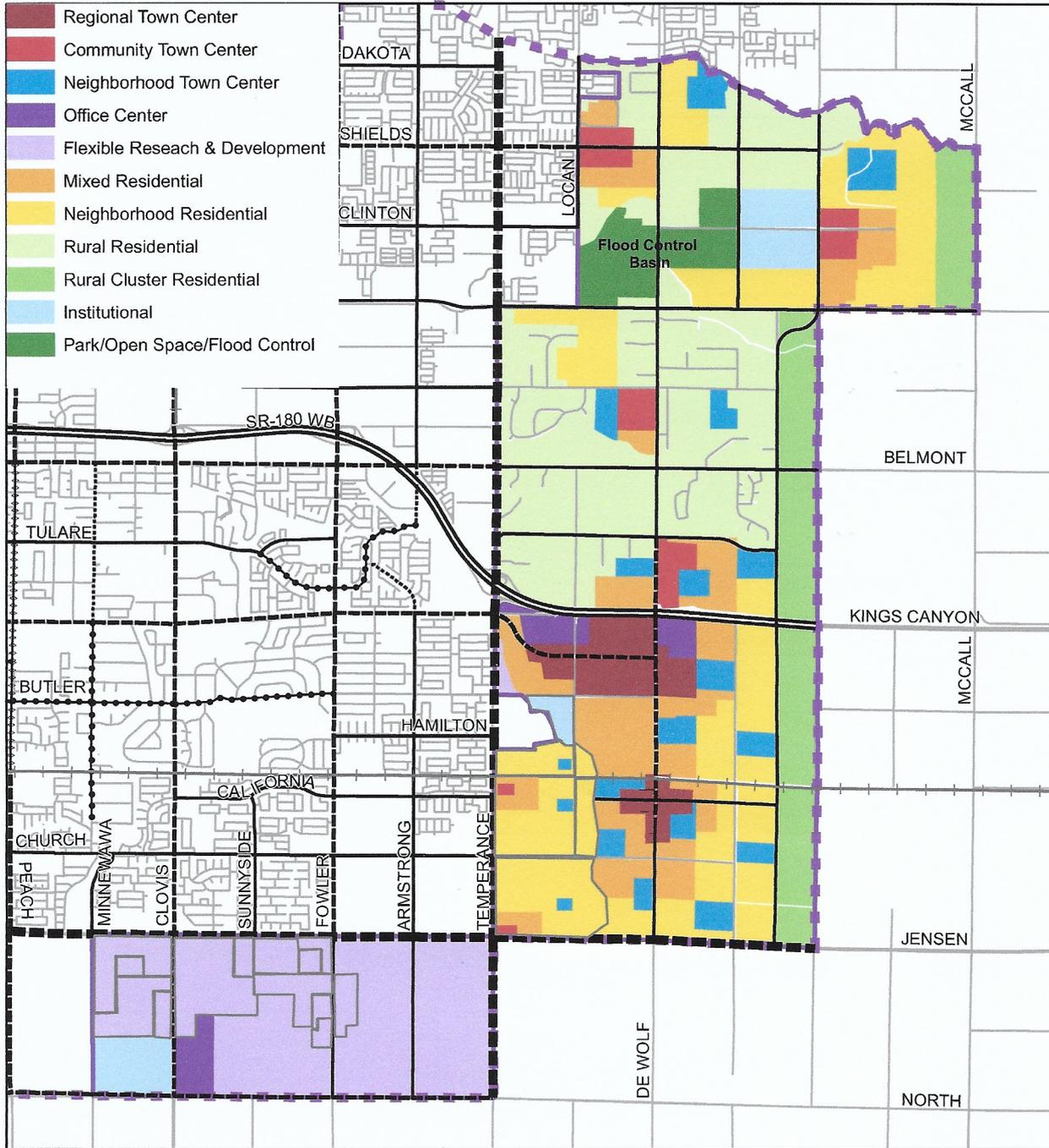
# CONSOLIDATED BUSINESS PARK ALTERNATIVE

Southeast Development Area

- Freeway
- Expressway
- Scenic Expressway
- Super Arterial
- Arterial
- Scenic Arterial
- Scenic Drive
- Collector
- Scenic Collector
- Southeast Development Area
- Fresno Sphere of Influence
- Major & Local Roads
- Railroads



Source: City of Fresno, SEDA Illustrative Plan derived from community and stakeholder meetings.



Source: City of Fresno



## Exhibit 5-1 Consolidated Business Park Alternative



**McCORMICK  
BARSTOW LLP**  
ATTORNEYS AT LAW

Jeffrey M. Reid  
Partner  
(Admitted in California, Virginia  
and District of Columbia)  
(559) 433-2310  
jeff.reid@mccormickbarstow.com

**FRESNO, CA OFFICE**  
7647 North Fresno Street  
Fresno, California 93720  
P.O. Box 28912  
Fresno, CA 93729-8912  
Telephone (559) 433-1300  
Fax (559) 433-2300

Other offices of  
McCORMICK, BARSTOW, SHEPPARD,  
WAYTE & CARRUTH LLP

www.mccormickbarstow.com

**CINCINNATI, OH OFFICE**  
Scripps Center  
312 Walnut Street, Suite 3425  
Cincinnati, Ohio 45202-4064  
Telephone (513) 762-7520  
Fax (513) 762-7521

**LAS VEGAS, NV OFFICE**  
8337 West Sunset Road, Suite 350  
Las Vegas, Nevada 89113  
Telephone (702) 949-1100  
Fax (702) 949-1101

**MODESTO, CA OFFICE**  
1125 I Street, Suite 1  
Modesto, California 95354  
Telephone (209) 524-1100  
Fax (209) 524-1188

**RENO, NV OFFICE**  
201 W. Liberty Street, Suite 320  
Reno, Nevada 89501  
Telephone (775) 333-0400  
Fax (775) 333-0412

**SAN LUIS OBISPO, CA OFFICE**  
1041 Mill Street, Suite 105  
San Luis Obispo, California 93401  
Telephone (805) 541-2800  
Fax (805) 541-2802

**VISALIA, CA OFFICE**  
403 North Floral  
Visalia, California 93291-4950  
Telephone (559) 433-1300  
Fax (559) 433-2300

May 19, 2025

Via Email: Jennifer.Clark@fresno.gov  
Sophia.Pagoulatos@fresno.gov  
Adrienne.Asadoorian@fresno.gov  
PublicCommentsPlanning@fresno.gov

Planning Commissioners for  
the City of Fresno  
c/o Planning and Development Department  
Director Jennifer Clark  
2600 Fresno Street, Room 3065  
Fresno, California 93721

**SUBJECT:** Planning Commission Hearing for May 21, 2025  
Agenda Item VIII-B - ID 25-657  
Proposed Recommendation for Certification of Final EIR  
For Southeast Development Area Specific Plan Project (State  
Clearinghouse No. 2022020486)  
Proposed Recommendation for Approval of Southeast Development  
Area Specific Plan  
Proposed Recommendation for Approval of a General Plan Text  
Amendment

Dear Commissioners:

This letter is submitted on behalf of our client, the County of Fresno (the "County") Department of Public Works and Planning regarding your Commission's evaluation of a recommendation that City Council certify the Final EIR (the "FEIR") for the Southeast Development Area Specific Plan Project (the "Specific Plan") commonly referred to as SEDA (the "Project"). Please ensure this letter and its referenced materials are included in the Record of Proceedings regarding the consideration of the Project by the City.

**Failure to Provide Responses to Comments.** I previously submitted comments to the circulated and recirculated EIR materials distributed by the City. Those letters are included in Exhibit I of your Agenda materials beginning at page 101 and beginning at page 720. Those comments are incorporated into this letter by this reference.

Some of the key elements of those comments are also summarized below. However, it is important to first emphasize that such comment letters are an important part of the CEQA process. They satisfy the obligation of a commenter to exhaust administrative remedies before they pursue any subsequent enforcement of a lead agency's violations of the CEQA process or standards. They also help hold a lead agency accountable to the public. CEQA accomplishes this by requiring that the lead agency provide the public its considered written responses to those comments.

The lead agency is required to provide its response to the comments by either including revisions to the Draft EIR, or incorporating those responses into the Final EIR materials. (CEGA Guidelines Sections 15088(d) and 15132(d)). This assures governmental accountability. The public can evaluate whether the lead agency has meaningfully and appropriately evaluated and addressed concerns about significant environmental issues raised during the public comment process.

Unfortunately, as of the writing of this letter, that has not yet happened. That is because the Response to Comments have not been included in the Final EIR. You are therefore placed in the difficult circumstance of being asked to recommend certification of a Final EIR that does not contain all materials expressly required to be included in a Final EIR. You should therefore table this hearing and not recommend action on the Final EIR until it is complete.

A Workshop was presented on this Project to the City Council by the City staff and the Mayor on May 1, 2025. At that Workshop the City staff advised that they would provide the Responses to Comments in the manner required by CEQA.<sup>1</sup> Guidelines Section 15088 provides that the Lead Agency is to respond to all comments made by a public agency at least 10 days prior to certifying the environmental impact report. There is not a similar precise deadline for providing responses to members of the general public. However such Responses are required to be included in the Final Certified EIR.

The City staff apparently therefore does not intend to provide its Responses to Comments until after your Commission deliberates on a recommendation to certify the EIR. It is a disserve to your Commission that you are being asked to recommend certification of a presently incomplete document.

These missing Responses to Comments are not inconsequential materials. CEQA acknowledges that Responses to Comments can raise new environmental issues. Because we do not have such Responses to Comments, no one is able to evaluate whether they trigger new CEQA issues. This also creates risks that Commenters may be unable to have appropriate opportunity to exhaust their administrative remedies with respect to such potential new CEQA issues.

---

<sup>1</sup> Please incorporate into the Record of Proceeding for this matter the materials presented to the City Council at the above referenced Workshop Presentation, available at <https://fresno.legistar.com/View.ashx?M=F&ID=14123598&GUID=5759BCE5-6BA7-4E97-A223-3B2817A04F0F>. Please also incorporate into the Record of Proceedings the transcripts of the Workshop Presentation, available at [https://fresno.granicus.com/player/clip/1804?view\\_id=1&redirect=true](https://fresno.granicus.com/player/clip/1804?view_id=1&redirect=true) beginning at the 3 hour mark.

**Other Undistributed and Late Distributed Project Materials.** Other important materials that should have been included as part of the Project evaluated by the EIR have also not been made available to the public.

*Missing Public Facilities Financing Program.* Among the missing materials is a public facilities financing program. At the Workshop, the City staff asserted that such a document is not generally developed as part of its approval of a Specific Plan Project. However, that assertion disregards the requirements of LAFCO Resolution USOI-144.

That LAFCO Resolution was adopted to authorize the addition of the SEDA lands into the City's Sphere of Influence. That Resolution also imposed important conditions that must be satisfied before any SEDA lands can be annexed into the City. An important requirement of LAFCO Resolution USOI-144 was its requirement that a Specific Plan document be adopted before any such annexations could proceed. However, LAFCO went further and required that the City address some specific matters, many of which would help address potentially significant environmental impacts of this Project. Unfortunately, the intended Specific Plan does not address all of the requirements of LAFCO Resolution USOI-144. One such violation is the failure of the City to provide a master services delivery plan.

One element of a master service delivery plan would include public facility financing program options. The City Staff advised that this document is still not yet ready for public review. However, it should be an element of the Specific Plan document that was submitted for environmental review.

During that Workshop, the Staff stated that when its public facilities financing options report is available (in a few weeks) it would make it available to the Council via a "tray memo". A "tray memo" is a City Hall vernacular for distributing a document to the council Members by placing it into their "in box" at City Hall. What that process does not involve is any meaningful public distribution of the document to the stakeholders that have participated in the CEQA comment and review process.

Some important aspects of that public facilities financing options report were, however, made public during the Workshop. Specifically, the Mayor advised the Council that, based upon the information included in that public facilities financing options report, he was adjusting his administration's recommendations concerning the Specific Plan's phasing program that had just recently been distributed. That circumstance is a clear example of how financial analysis can impact the phasing of a project development.

*Newly Distributed Phasing Plan.* A project's phasing can also have significant environmental impacts different and those impacts can vary based upon the strictures of a specific phasing program. For that reason my prior Comment letters referenced the previously Specific Plan's previously stated implementation objectives. The Plan previously stated that development of SEDA is to occur in an organized and phased

manner. (Specific Plan, p.12, RDEIR p. 2-12), and that annexations will be "strategic and proactive to facilitate infrastructure development by the City." (RDEIR at p. 2-3).

My comment letter noted that an important value of a phasing plan is that it can help diminish the pressure on early conversion of farmlands and impacts on existing rural residential uses within the Specific Plan boundaries. A phasing program is therefore a tool to address the Project's impacts on existing rural residential neighborhoods and to mitigate the impact on farmland conversions. The comment noted that one easy phasing strategy we recommended is a policy of the City to help ensure that the unincorporated lands west of Temperance Avenue within the City Sphere of Influence are timely annexed before annexation begins with SEDA.

The City staff first disclosed its newly proposed Phasing Plan as part of the Workshop materials. That Phasing Plan is included in your Agenda materials as Exhibit "G". The Phasing Plan delineates two areas as a number 1 phase of development, including 1S and 1N. The document also illustrates intended Phases 2 and 3. There is no text that proposes any requirement that the project be developed in any specific order that corresponds to the designated number for a phase, but that is the implication of the document.

This Phasing Plan is not incorporated into the terms of the Specific Plan. Nor was it distributed for public review and comment as part of the Project materials made available during the CEQA comment review process. Nor were the impacts of that Phasing Plan evaluated in the EIR, to address whether it that phasing plan could have create new environmental impacts, or increase severity of identified environmental impacts.

Despite the very recent public release of the Phasing Plan, the Mayor, as part of his testimony at the Workshop, expressly disavowed the intended arrangements reflected in the submitted phasing plan. The Mayor testified that the as yet undistributed Public Facilities Financing Options Report determined that it would cost approximately \$1.5 billion to fund the water main and sewer main infrastructure required to commence development in Phase 1N. He stated that he found that the costs for that infrastructure necessary to develop Phase 1N would not provide a reasonable return on public investment.

He further testified that the costs of similarly required infrastructure for Phase 1S is \$91 million dollars. Based on that circumstance he testified that his administration would not support moving forward with any development beyond Phase 1S over the next 4, 5 or 10 years.

As noted above and in my prior comment letters, a Phasing Plan has important implications for potentially significant environmental impacts of the Project. The staff's newly proposed Phasing Plan, and the Mayor's intended additional constraints and limitations on that staff proposed Phasing Plan, raises the potential for new significant

environmental impacts (CEQA Guidelines Section 15088.5). The EIR should therefore be updated to evaluate the phasing program. That analysis should be recirculated for public review and comment.

*Newly Distributed General Plan Text Amendment and its Newly Disclosed Development Standards are Inconsistent with the Specific Plan and EIR.* The agenda materials for this hearing include the first ever distribution for public review of a proposed text amendment to the City's General Plan. That Text Amendment is intended to incorporate references into the General Plan that confirm the intended adoption of the SEDA Specific Plan. The intent to adopt such a General Plan text amendment document was only vaguely alluded to in the Specific Plan document. Its terms were never previously provided to the public.

My prior comment letters criticized the SEDA Specific Plan and EIR because neither document set forth the actual density standards for the land use categories in the Plan document. That is because the Specific Plan asserts that those density standards are to be detailed in a future development code. It is difficult to understand how the environmental impacts of a Specific Plan, or its infrastructure demands, can be addressed without those fundamental aspects of a planning document.

The newly distributed General Plan Text Amendment includes the most detailed statement about the intended density standards for the SEDA Specific Plan. It is therefore a positive circumstance that this information is now disclosed. However, this newly disclosed information should now be subject to public review and comment as part of the EIR process.

In addition, that review process needs to address some apparent inconsistencies between the density standards stated in the General Plan Text Amendment versus what was disclosed in the Specific Plan and its EIR. Specifically, in all instances, the EIR simply states that the density for this land use will be set forth in an upcoming SEDA Development Code update (p.3.11-3). The Specific Plan makes the following statements about density standards that are different from the standards included in the General Plan Text Amendment.

1. For SEDA's Regional Town Center, the Specific Plan simply states that it will support medium to higher density housing, with no defined densities (p.41). The newly distributed General Plan Text Amendment states that there will be a maximum of 70 units per net acre, a previously undisclosed density standard (p.3-7).

2. For SEDA's Community Town Centers, the Specific Plan includes no density standards other than the statement that each of the seven community town centers would support between 5,000 and 10,000 households, and feature a variety of medium-density housing options, with no defined densities (p.13). The newly distributed General Plan Text Amendment states that there will be a maximum of 55 units per net acre, a previously undisclosed density standard (p.3-7).

3. For SEDA's Neighborhood Town Centers, the Specific Plan includes no density standards other than the statement that each such center will support approximately 1,500 to 2,000 households and includes a range of medium to lower-density housing options, with no defined densities. The newly distributed General Plan Text Amendment states that there will be a maximum of 30 units per net acre, a previously undisclosed density standard (p.3-7).

4. For SEDA's Mixed Residential land uses, the Specific Plan states that residential blocks will have an average net density of 25 units per acre. The newly distributed General Plan Text Amendment states that there will be a maximum of 25 units per net acre, a previously undisclosed density standard (p.3-7). It is unclear how the Project, as a practical matter, will obtain a stated **average net density of 25 units per acre** when it imposes a **maximum density of 25 units per acre**.

5. For SEDA's Neighborhood Residential land uses, the Specific Plan states that that residential blocks will have an average net density of 20 units per acre. The General Plan Text Amendment states that there will be a maximum of 20 units per net acre, a previously undisclosed density standard (p.3-7). It is unclear how the Project, as a practical matter, will obtain the stated **average net density of 20 units per net acre** when it imposed a **maximum density of 20 units per net acre**.

6. For SEDA's Rural Neighborhood Residential land uses, the Specific Plan states that that such land uses will be protected by the Annexation Overlay Ordinance. The General Plan Text Amendment states that there will be a maximum of 1 residential unit per lot, a previously undisclosed density standard (p.3-7). It is unclear how the **maximum 1 residential unit per lot** standard will be applied in the context of the Annexation Overlay Ordinance's standards.

7. For SEDA's Rural Cluster Residential land uses, the Specific Plan states that that such land uses will have a maximum average net density of 0.5 units per acre. The General Plan Text Amendment states that there will be a maximum of 0.5 residential units per acre, a previously undisclosed density standard (p.3-7). It is unclear how the Project, as a practical matter, will obtain the stated **average net density of 0.5 units per net acre** when it imposed a **maximum density of 0.5 units per net acre**.

*Missing Implementation Program for Annexing Open Space Areas and Rural Residential Neighborhoods.* LAFCO Resolution USOI-144 requires that the City prepare an implementation program for annexing open space areas and rural residential neighborhoods, with a goal of preserving the desirable qualities of such rural neighborhoods.

The City fails to address those requirements in the Specific Plan, other than to assert that its adopted Annexation Overlay Ordinance protects such uses. During the

Workshop, the Planning Director stated that if you currently have goats and chickens and horses, you can keep your goats and chickens and horses, in perpetuity.

However, that Annexation Overlay Ordinance allocates current legally conforming uses and structures to legal nonconforming status. Expansion of a legal nonconforming use is prohibited. So, if you are keeping goats and horses and chickens, you may face code enforcement for violating the legal nonconforming use standards if you increase the number of goats or chickens or horses that you keep (or add more goats while reducing the number of horses).

The legal nonconforming status may also create difficulties with lenders and buyers of property, and the imposition of those constraints are not consistent with protecting the maintenance of such rural residential uses. That legal nonconforming status will also hinder appropriate expansion of existing legal nonconforming structures that may be reasonable and desirable to maintain thriving rural residential neighborhoods. None of these circumstances are addressed in the EIR or the Specific Plan.

**Impact of City's Grant Funding on Its Evaluation and Adoption of the Project.**

This Commission may reasonably wonder why City staff is insistent on obtaining your recommended approval of a Final EIR document that does not include all components of a Final EIR document.<sup>2</sup> Unfortunately, the answer to that question is apparent if you review the staff testimony at the recent Workshop.

Specifically, the City obtained a grant to complete this planning project from the State of California under SB-2 funding. That grant funding included a deadline for the City to complete its planning efforts and its adoption of the intended plan document. If the City fails to meet that deadline, the City is faced with a requirement to reimburse the State \$625,000.00 for the State grant funds used for these efforts.

This planning process was delayed because the City was required to recirculate an updated EIR document because the engaged planning consultants failed to distribute important aspects of these planning materials when the materials were first circulated. The City was further delayed due to the need to further recirculate a further updated EIR document because prior amendments to its General Plan were overturned by a court ruling for violating CEQA. That court ruling suggested that the City's planning consultants pursued a CEQA strategy that was unnecessarily difficult.

This planning process was not delayed by the public or other stakeholders. Yet, the City is now segmenting the information that it makes available in this planning process to best assure that it satisfies the grant funding deadline. As a result, neither the Planning Commission, nor the public, have received the Responses to Comments. In

---

<sup>2</sup> You should also question why you are being asked to recommend approval of a Specific Plan document that does not address all of the matters that LAFCO Resolution USOI-144 requires to be addressed.

City of Fresno  
Planning Commission  
May 19, 2025  
Page 8

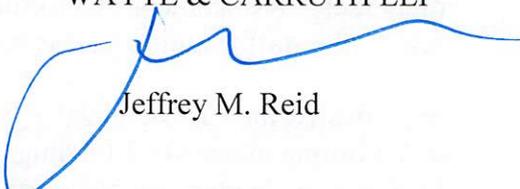
addition, the public is denied any meaningful opportunity to review and comment upon the new General Plan Text Amendment density standards, the newly proposed phasing programs, or the still undistributed public financing options report that has informed the Mayor to make a new recommendation on the Phasing program. All of these materials are relevant to potentially significant impacts of the Project and its mitigation measures.

It should concern this Commission that the City is financially incentivized to cut corners in the public review and comment process to satisfy its grant agreement required timelines.

**Conclusion.**

Based on the foregoing, we respectfully request that the City not consider the Project and its EIR until Responses to Comments are distributed. Nor should this Commission take action to recommend the certification of the EIR until it is updated and recirculated to address the newly available information about phasing strategies, public financing strategies, and the General Plan Text Amendment proposals detailed above.

Sincerely,  
McCORMICK, BARSTOW, SHEPPARD,  
WAYTE & CARRUTH LLP

  
Jeffrey M. Reid

cc: Bernard Jimenez, Planning & Resource Management Officer  
Fresno County Department of Public Works and Planning

**From:** [Shelly Spencer](#)  
**To:** [PublicCommentsPlanning](#)  
**Cc:** [Sophia Pagoulatos](#)  
**Subject:** Public comment re SEDA Specific Plan  
**Date:** Monday, May 19, 2025 2:39:05 PM  
**Attachments:** [image002.png](#)

---

**External Email: Use caution with links and attachments**

For May 21, 2025  
Fresno City Planning Commission

Re: VIII-B ID 25-657 Public hearing to consider the adoption of the Southeast Development Area Specific Plan

Specifically re:

- Amendment Application No. P23-03090 which proposes to adopt the Southeast Development Area Specific Plan and
- Amendment Application No. P23-03091 which proposes to update the Planned Land Use Map and the Dual Designation Map

After reviewing the SEDA specific plan and associated maps...

An initial question: **why does the map not show green spaces set aside for parks?**

Everything dark green appears to be labeled pb (ponding basin) and while it looks like there is a larger park in the north section earlier maps show this to be a flood control area.

My primary question: **How will the Plan help existing neighborhoods and not harm them by spreading resources out over a larger area?**

The SEDA specific goals *sound* great! HOWEVER why are we promoting these goals for undeveloped areas and not for existing neighborhoods?

I live in Southeast Fresno but the Plan boundaries identify areas that are outside of existing neighborhoods. When do existing neighborhoods get to benefit from goals listed? If the Plan is all based on developer money and new property taxes Who really stands to benefit here?

When does Jackson neighborhood with RHS and Jackson elementary get to have:

- Mixed use town centers
- Innovative employment
- High quality transit service
- Community farming

Furthermore, how do already identified needs of our neighborhoods get addressed and not overlooked with the emphasis on a huge new area of development?

- Police and Fire are understaffed
- Lead pipes need to be replaced in our neighborhood

Abandoned buildings and lots sitting empty could be sites for SEDA goals

As officials appointed to look out for the people of Fresno, (and not just Fresno as a business) please give greater weight to the input of Fresno residents than to outside influences. We would be happy to come to the table together to look at what's best for ALL of southeast Fresno.

Thank you.  
Shelly Spencer  
District 5 resident

SEDA plan document and maps which this response is based on:

<https://fresno.legistar.com/View.ashx?M=F&ID=14215700&GUID=8D77E170-5521-409D-A3DF-834C234AF191>

On Fri, May 16, 2025 at 5:04 PM Sophia Pagoulatos <[Sophia.Pagoulatos@fresno.gov](mailto:Sophia.Pagoulatos@fresno.gov)> wrote:

Good afternoon,

This email is to inform you that the Southeast Development Area Specific Plan and associated Environmental Impact Report will be considered by the Fresno City Planning Commission on **May 21<sup>st</sup>, 2025 at 6:00pm**. Please refer to the attached Planning Commission agenda.

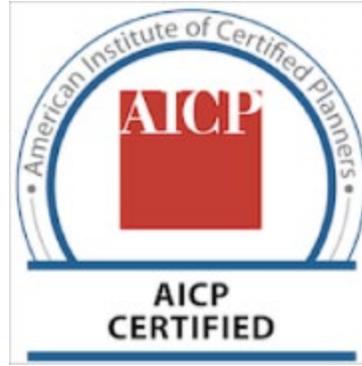
**Sophia Pagoulatos | Planning Manager**

Long Range Planning | Planning & Development

[City of Fresno | 2600 Fresno St | Fresno CA 93721](#)

[559.621.8062](tel:559.621.8062)

[Sophia.Pagoulatos@Fresno.gov](mailto:Sophia.Pagoulatos@Fresno.gov)



Resources: [Long Range Planning | GIS & Mapping](#)

[Citywide Development Code | Plans & Projects Under Review](#)



PATIENCE MILROD

LAWYER/LICENCIADA EN LEYES

May 19, 2025

**Fresno City Planning Commission**

Peter Vang, Chair  
Kathy Bray, Vice Chair  
Rev. David Criner, Commissioner  
Monica Díaz, Commissioner  
Jacqueline Lyday, Commissioner  
Linda M. Calandra, Commissioner  
Gurdeep Singh Shergill, Commissioner

by email to [clerk@fresno.gov](mailto:clerk@fresno.gov)

RE: Public comment and **request to continue hearing**  
Re: Southeast Development Area Plan  
May 21, 2025 Planning Commission Agenda

Dear Chairman Vang and Fresno City Planning Commissioners,

On behalf of the Central Labor Council of Fresno, Madera, Kings & Tulare and Regenerate California Innovation (RCI), I respectfully submit the following comments, and request that the matter be continued until your Commission has adequate and accurate information on the basis of which to make a responsible recommendation to the City Council.

**Summary**

The SEDA Plan is a massive undertaking; adoption would carry serious consequences far into Fresno's future, including unmanageable debt, even more disinvestment in existing neighborhoods with even more decay, and significantly worsened traffic, air pollution, and public health.

Your Commission is not a rubber stamp. The Planning Department is not *entitled* to your support for this Plan—they must provide complete, and accurate, information so you can make a conscientious decision on the project. As of this writing, infrastructure studies that are essential to your decision, and to your Findings, are still in the hands of the City Manager; another study claiming to support market demand claims was released last week. It appears to be fundamentally defective and misleading, and we note it is not part of your agenda packet.

Finally, with the federal cuts announced this week to the Housing Choice Voucher program,

---

985 NORTH VAN NESS AVENUE  
FRESNO, CALIFORNIA 93728  
559.246.7239  
PM@PATIENCEMILROD.COM



Fresno’s immediate impending housing crisis is not a lack of homes for upper and middle-class Fresnoans in SEDA – in fact we face an imminent “mass displacement event,”<sup>1</sup> which requires we invest our scarce collective resources in an entirely different direction from SEDA.

We ask that you insist on taking the time you will need to make sense of all you must consider so that you can make the right decision, and factually supportable findings and recommendations. We respectfully request that you decline to act at this time, and continue the matter until after revision and recirculation, and an appropriate public comment period.

**I. The hearing should be continued because the notice was defective.**

Fresno Municipal Code § 15-5007.6 requires that a notice of public hearing include the location and times at which the public may view “the **complete application and project file.**” The undated notice of the Planning Commission and City Council public hearings on the SEDA Plan (Exhibit M in your agenda packet) offers public access to only the two Plan Amendment Applications and the Program Environmental Impact Report, informing the reader that “*these documents* are available for public review...” [emphasis added]. However, the project file (as of two days ago) now also includes a “Market Demand Analysis,” and will eventually (we are told) include an Infrastructure Plan, a Public Facilities Financing Plan (PFFP), and a Fiscal Impact Analysis.

These late-produced documents constitute part of the project file. They should have been available for public review as of the date the notice was issued. They were not.

**We therefore request, pursuant to Rule 9.C of the Planning Commission Rules and Regulations, that you continue this matter to a date far enough out to permit release of the missing infrastructure studies, and a new round of consultation and recirculation for public comment.<sup>2</sup>**

**II. Additional time to evaluate the Plan is both appropriate and necessary.**

Requiring the City to timely release to the public all the materials supposedly supporting the Plan is not a mere technical rule. The studies on market demand and infrastructure are supposed to include the data allowing your Commission, the City Council, and the public to determine if SEDA is a good idea or a terrible one:

What will it cost the City to annex SEDA and facilitate development there?

Who will pay for infrastructure?

What will be the fiscal and physical impact of sinking dollars into SEDA that are needed to pay for repairs and improvements in existing neighborhoods?

---

<sup>1</sup> See, *Thousands of Fresno residents would lose their homes under Trump’s budget plan, officials warn*, <https://fresnoland.org/2025/05/16/housing-authority/>

<sup>2</sup> Required by CEQA when the public agency provides “significant new information” prior to certification of the EIR, per Public Resources Code § 21092.1.

And will there be enough population growth to justify the investments and the sacrifices that SEDA will require?

The late release of the Market Demand Analysis (MDA) is a good example of why the public should have timely access to the complete project file. We finally learned late last week that the MDA was posted for public review. It's almost 200 pages long. A spot check reveals multiple inconsistencies with existing Fresno City and California State studies, reports and policies, as well as a completely idiosyncratic and unexplained formula for projecting population growth, but there has not been time to review it thoroughly and document its multiple deficiencies. It appears that even the study that supposedly supports the City's making massive investments in SEDA is fatally flawed.

**III. The State cannot require that the City approve SEDA.**

It is untrue that unless the City adopts/approves the SEDA Plan and EIR, the state will claw back the \$625K funding it granted for SEDA planning.

The City could not lawfully commit in advance to approve the project as a grant deliverable, because the City Council has a constitutional duty not to bargain away its discretion. The Council is only obligated to review the EIR the grant paid for, to decide if the project is actually in the best interests of the City, and to reject or approve the project on that basis.

The Mayor and staff have repeatedly claimed that the entire SEDA Plan must be adopted immediately in order to meet the housing crisis. However, the record shows it is not necessary to approve SEDA to meet Fresno's housing needs – the SEDA EIR itself admits “there is ample residential capacity within the current city limits and in Growth Area 1 (which includes Southwest Fresno and the West Area Neighborhoods Specific Plan areas).”<sup>3</sup> The City's own West Area Neighborhoods Specific Plan shows a capacity for 50,000 new homes. It is far more logical to finish the West Area, and other legitimate growth areas that are higher on the General Plan's priority list than SEDA.

**IV. There is still too much unknown – your Commission cannot legitimately make the Findings of Fact, nor recommend the proposed overriding considerations, until you have all the pertinent evidence.**

**a. Findings of Fact must be based on evidence**

State law requires that your Findings be based on substantial evidence: that is, relevant information and reasonable inferences, but not argument, speculation, unsubstantiated opinion or narrative, or evidence that is clearly erroneous or inaccurate. The statute emphasizes the importance of facts: “Substantial evidence shall include facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts.”<sup>4</sup> Thus, statements (and especially conclusions) by staff are not evidence, unless they are based on facts; one of your roles as Commissioners is to ensure that the statements fairly reflect the facts on which they are

---

<sup>3</sup> Exh. J, SEDA PEIR p. 2-1 (pdf p. 103).

<sup>4</sup> CEQA Guidelines, § 15384, subd. (a) and (b).

assertedly based.

But, as you know, not all facts are created equal. Even a “study” or a “report” may not be factually accurate, and therefore not credible evidence. For a study about SEDA, you’ll want to know:

Is it consistent with, or does it contradict, the SEDA Plan itself or the narrative in the EIR?

Is it consistent with, or does it contradict, other credible reports and studies?

Does it make common sense?

**i. The SEDA Plan analyses do not provide substantial evidence supporting population growth assumptions**

A good example of unreliable studies and reports is how the EIR and the Housing Market Demand Analysis (HDMA) answer the question of whether our population is in fact growing fast enough to create a demand for the 45,000 SEDA homes.

The EIR relies on growth projections that were accurate at the time the 2014 General Plan was adopted<sup>5</sup>. The HDMA – as you’ll see if City staff ever releases it to you – uses an idiosyncratic forecasting method based on unsupported assumptions regarding employment growth, employment-to-permit ratios, and city capture of increasing share of countywide permits. The resulting HDMA forecast numbers from these do not match the EIR’s, but they are close.

However, both the EIR and the HDMA fail to use the far more accurate and current State of California Department of Finance population projections, even though they are the gold standard in California<sup>6</sup>, and have been adopted by the Fresno County Council of Governments (FCOG) for its core transportation planning functions<sup>7</sup>.

It’s clear why this matters when you examine the attached Exhibit A, a page from the FCOG’s Fresno County 2023-2060 Growth Projections<sup>8</sup>. You can see that projections from 2018 (blue

---

<sup>5</sup> At p. 3.14-13, the Draft PEIR notes without explanation that “The population potential for the Plan Area is within the population growth anticipated by the General Plan, which anticipates growth of up to 226,000 additional residents by 2035, consistent with the proposed project.” The meaning of this statement is unclear; what is clear is that the EIR does not explain *why* it is using clearly inaccurate figures rather than significantly different and more reliable data from the California Department of Finance.

<sup>6</sup> According to the California State Association of Counties, “The Department of Finance’s annual population estimates are widely applied as the official benchmark for myriad state and local calculations, as well as the basis for population tiers for county implementation requirements for many programs ... This includes calculations for local streets and roads funding distribution, Behavioral Health Services Act fund distribution, annual calculations by local agencies for the state appropriations limit, and more.” See, <https://www.counties.org/news-and-media-article/state-updates-population-and-housing-data-estimates> (last accessed May 15, 2025).

<sup>7</sup> See, FCOG website, <https://www.fresnocog.org/project/demographic-data/> (last accessed May 17, 2025).

<sup>8</sup> See, p.5, <https://www.fresnocog.org/wp-content/uploads/2023/11/2024-Fresno-COG-2023-2060-Growth-Projections-REPORT.pdf> (last accessed May 18, 2025).

line) show a steadily climbing population until 2050. The 2022 projections (orange line) are still optimistic, but significantly lower. By the 2024 update, both the California Department of Finance and FCOG (black/green/gray line) show population growing at a much slower pace than previous projections, peaking in 2055, and dropping thereafter. The predicted green spot just above 100 million on the black/green/gray line has turned out to be the accurate one, at a County 2025 population of 1,017,950.

For your Commission’s purposes regarding SEDA, the numbers offered by the EIR and HMDA are “evidence that is clearly erroneous or inaccurate”: they show population growth at twice the rate of the more recent and more reliable industry-standard data from the Department of Finance, and there is no coherent explanation for why the EIR and HDMA use older and/or less reliable data for this critical aspect of their respective analyses.

This fundamental error in choice of growth figures renders both studies not credible. The EIR’s reliance on the older and now inaccurate data makes it fundamentally inadequate as an informational document under the law. Given the authoritative Department of Finance’s 0.2% annual increase figure, all of the EIR’s assumptions about housing demand, and the someday-to-be-disclosed Public Facilities Financing Plan’s assumptions about reimbursement streams for infrastructure investments, are just wrong.

**We therefore request that your Commission direct staff to return with an EIR that analyzes SEDA’s environmental and fiscal impacts using the correct, lower population projections used by the State of California and the FCOG.**

**ii. There is no evidence at all in the record to support claims that the SEDA Plan will be self-supporting.**

Wishing doesn’t make it so. The SEDA Plan’s and PEIR’s assertions don’t make it so. Staff statements and claims don’t make it so. And the Mayor has admitted it’s not so:

On May 1, in the City Council workshop on SEDA, he said: “In order to build water mains and sewer mains from the north end, down the Temperance trunk line, all the way over to our wastewater treatment plant was going to cost us a lot of money.” “In many cases, it could have been \$1.5 billion.” **“The potential for it [the costs of SEDA] to fall on the general fund and ratepayers, I believe it’s all true,” Dyer said. “That return on investment would have taken so long, it would have been on the backs of ratepayers.”**<sup>9</sup>

The Mayor could be wrong – maybe the costs won’t fall after all on the general fund and Fresno City rate payers. But you have no **evidence** for that.

Since November of 2020, when the City contracted with First Carbon, we have been told we would see not only an EIR, but also an infrastructure assessment, and a fiscal nexus study. Where are they?

It is impossible to determine realistically what this Plan will cost, and who will pay for it,

---

<sup>9</sup> <https://fresnoland.org/2025/05/02/seda-losing-mayor-dyer-support/>

without these analyses.

In addition, the City must produce a Fiscal Impact Analysis to show whether there will be net property tax revenues, and that existing neighborhoods won't suffer by diversion of scarce City resources into SEDA infrastructure.

**We therefore request that your Commission decline to act on this project until you – and the public–have received, and have had a chance to review, all of the pertinent infrastructure documents, and a Fiscal Impact Analysis showing how SEDA will affect the rest of the city.**

**b. Any Statement of Overriding Considerations (SOCs) must be “supported by substantial evidence in the record,”<sup>10</sup> in order to justify a finding that the benefits of the project outweigh its costs.<sup>11</sup>**

We respectfully submit that you do not have the evidence to support the truth of the following SOCs, nor to weigh their potential costs and benefits so as to justify a legitimate recommendation to the City Council:

- *“The Specific Plan would implement policies designed to facilitate housing affordable to a range of household incomes.”*

**There is no evidence in the record** about affordability levels of the new homes in SEDA. Although there may be some multifamily housing built, it defies logic that there will be any housing affordable to below-moderate income families if SEDA is actually to be self-supporting: Every additional new fee or tax – for wet utilities, for fire and police stations, for parks and streets, sidewalks and street trees, and into the future for staffing, maintenance, and replacement – will increase the cost of every home. Even within the present City limits, it is cost-prohibitive to build affordable housing. In SEDA that problem will be worse.

As the Mayor's own One Fresno Housing Strategy confirmed, Fresno has a glut of single-family homes at the inflated SEDA price point; what Fresno does need is more than 20,000 homes for families with very low incomes<sup>12</sup>--not even a goal of SEDA, and in any event not achievable in SEDA if the project is to be self-financing. Without evidence of affordability levels, it is impossible to conclude that this project will produce so many *needed* homes as to justify overriding the impacts of massive additional pollution, traffic, and diversion of scarce resources away from existing neighborhoods with resulting intensified blight and decay.

- *“The Specific Plan would implement policies designed to provide an accessible and well-balanced transportation network with a range of transportation options for residents and employees.”*

---

<sup>10</sup> CEQA Guidelines, § 15093, subd. (b).

<sup>11</sup> CEQA Guidelines, § 15093, subd. (a).

<sup>12</sup> “Fresno needs 21,001 units for households who can afford no more than \$500 on monthly housing costs,” and “the City of Fresno has a glut of 28,310 single-family detached units over and above what Fresno households need based on household size.” *One Fresno Housing Strategy*, April 2022, p. 38.

**There is no evidence in the record** that the claimed transportation network will ever come into being. As one commenter pointed out:

The EIR impact analysis throughout the document relies on the notion that bus rapid transit (BRT) service will be expanded in Fresno to serve the project area (Kings Canyon), rendering several impact areas less than significant. However, the EIR does not provide any meaningful evidence to support the conclusion that the BRT expansion will actually be constructed. Most notably, the Fresno COG Long Range Transportation Plan<sup>13</sup> (LRTP) (2019-2050) does not include service to the SEDA SP area as a specific project. Table 2 - LRTP Project List within the LRTP only includes, “Project 6: Extend the Kings Canyon BRT corridor to Fancher Creek,” and the Fancher Creek area is located north/west of the SEDA areas and not contiguous to it. Therefore, BRT service to the project area is not a funded commitment or project and is not planned to exist by 2050. The EIR must be revised to clarify this and update its impact analysis throughout the document.”<sup>14</sup>

Without evidence that the claimed transportation system is even feasible, it is impossible to weigh its benefits so as to justify overriding the impacts of massive additional pollution, traffic, and diversion of scarce resources away from existing neighborhoods with resulting intensified blight and decay.

- *“The Specific Plan would implement policies designed to support and promote local agriculture, community farming, and small-scale agriculture to both improve economic opportunities for residents and increase access to local foods.”*

**There is no evidence in the record** that there will ever be agriculture-promoting policies in the City of Fresno, let alone that they will have the effects touted here. From reviewing the passionate comment letters in Exhibit I, you will be aware of the vehement opposition to the Plan from the people who actually live there: it is emphatically *not* their view that SEDA “supports and promotes local agriculture, community farming, and small-scale agriculture” – to the contrary, it threatens to destroy their own small farms and way of life.

Moreover, as one commenter noted:

As there is “ample residential capacity within the current city limits and in Growth Area 1,” allowing development to occur in SEDA - which contains more than 2,475 acres of Prime Farmland, 1,352 acres of Farmland of Statewide Importance, 1,189 acres of Farmland of Local Importance, and 1,725 acres of Unique Farmland (totaling 6,741 acres) - would be a violation of state policy, as written in the Housing Crisis Act.<sup>15</sup>

---

<sup>13</sup> <https://www.fresnocog.org/wp-content/uploads/2021/10/Fresno-County-Regional-Long-Range-Transit-Plan-050519-RL-34.pdf>

<sup>14</sup> See, Exh I, p.422, March 21, 2025 comment letter, Blum, Collins & Ho on behalf of Golden State Environmental Justice Alliance.

<sup>15</sup> <sup>15</sup> See, Exh I, p.675, undated comment letter, Daniel Brannick.

In other ways too, positing SEDA as the solution to the housing crisis directly contravenes the goals of the Housing Crisis Act<sup>16</sup>, which notes that “(12) The housing crisis also harms the environment by doing both of the following: (a) Increasing pressure to develop the state’s farmlands, open space, and rural interface areas to build affordable housing, and increasing fire hazards that generate massive greenhouse gas emissions (B) Increasing greenhouse gas emissions from longer commutes to affordable homes far from growing job centers.” (emphasis added). The Act later states: “(c) The Legislature also recognizes that **premature and unnecessary development of agricultural lands for urban uses** continues to have adverse effects on the availability of those lands for food and fiber production and on the economy of the state. Furthermore, it is the policy of the state that development should be guided away from prime agricultural lands; therefore, in implementing this section, local jurisdictions should encourage, to the maximum extent practicable, in filling existing urban areas.” (emphasis added).

Lacking evidence to support the claim that developing SEDA’s rural areas is necessary anytime in the next two decades, and having received evidence of its deleterious effects on small-scale agriculture in the area, it is impossible to conclude that the SEDA Plan is anything but “premature and unnecessary development of agricultural lands for urban uses.” Based on this evidence, it is impossible to conclude SEDA’s benefits justify overriding its economic and social impacts on those who live in the SEDA area, and its impacts on the rest of Fresno resulting from its massive additional pollution, traffic, and diversion of scarce resources away from existing neighborhoods with resulting intensified blight and decay

**c. The information you do have, in the EIR and its Appendices, is missing big chunks of important data.**

A few examples:

- What are the real traffic numbers?

Air quality impacts are measured based largely on pollution created by automobile travel (“vehicle miles traveled” or “VMT”).

The EIR badly undercounts VMT – it assumes all SEDA residents will do all their shopping, commuting to work or school, medical visits, and entertainment *within* the SEDA footprint. The Draft EIR implausibly forecasts SEDA at buildout to generate only 5 VMT/person, vs. Los Angeles currently at 9.3 VMT and New York City at 17 VMT. Transportation experts have submitted evidence in the record that it will take at least 20 years to determine if this could happen, if it ever does. All those 20 years’ of VMT for millions of vehicle trips outside of SEDA are omitted from the EIR’s traffic impacts, and from the air quality impacts.

**We request that your Commission direct staff to return with an EIR that realistically and honestly assesses VMTs, and that re-analyzes SEDA’s traffic**

---

<sup>16</sup> [https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill\\_id=201920200SB330/](https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201920200SB330/)

**and air quality impacts based on those more-accurate numbers.**

- What is the human health impact of SEDA?

All that additional air pollution will fall particularly hard on residents of SE Fresno. The EIR is legally required to quantify ozone production, and to include a quantified analysis linking the amounts of project-generated pollution to increases in mortality, morbidity, and years of life lost. This EIR has not done that.

**We request that your Commission direct staff to return with an EIR that calculates the ozone that SEDA will produce, as well as the deaths, hospitalizations, years of life lost, and other SEDA-related human health impacts not only from ozone but also from the other half-billion (minimum) metric tons of SEDA-related pollution.**

- Where are the protections against developer subsidies?

As the Mayor admitted at the workshop on May 1, Fresno has a history of subsidizing developers. The way the Plan is written, those subsidies will continue (e.g., when wastewater capacity won't accommodate a proposed development, the City "City shall evaluate proposed wastewater treatment improvements provided in the City Wastewater Master Plan and General Plan for potential environmental impacts, **and shall construct such improvements prior to exceedance of capacity to accommodate full buildout of the Specific Plan.**" 2025 SEDA EIR, p. 3.18-64, MM UTIL-1c and 1d). **There is no requirement the City be reimbursed for these costs.**

**We request that your Commission decline to act on the SEDA project until you, and the public, have received and had opportunity to review the Public Facilities Financing Plan.**

- Millions (or more likely billions) of City taxpayer dollars in SEDA infrastructure is a bad investment, for two reasons:

1 – Population growth is now so slow that it's unlikely there will be a meaningful number of people coming into Fresno to buy SEDA homes. If the City fronts the money for the infrastructure, it will have no revenue stream to reimburse those frontloaded costs.

**We request that your Commission direct staff to return with an EIR that uses the correct, lower population projections used by the State of California and the Fresno Council of Governments to analyze SEDA's environmental and fiscal impacts.**

2 – Fresno's existing neighborhoods are desperate for repair and replacement of old sewer, water, streets, sidewalks, etc. The Mayor's proposed FY 2025-2026 City budget already recommends belt-tightening and reduced hiring (and therefore reduced services) in the amount of \$50 million. Until there is an actionable plan to take care of current needs, the City should not be taking on huge new obligations it may not be

able to repay.

**We request that your Commission decline to act on the SEDA project until you have received and had time to review an appropriate Fiscal Impact Analysis.**

- It is a baseless claim that Fresno is “subsidizing” other counties:

We *could* know the numbers showing how SEDA will affect City finances—the City Council paid for a fiscal impact analysis tool to do exactly that. A fiscal impact analysis was one of the deliverables in the original contract with the SEDA consultant. We do not know if it was done. We do know that since then the Planning Department has claimed, inaccurately, that the tool isn’t suitable to analyze SEDA.

The commonsense question is whether there will be a *net gain* in property tax revenue from SEDA. Building new homes there will, yes, generate property taxes. But it will also obligate the City to serve all those homes—to pay all the costs to build, staff, and maintain sewer and water facilities, police and fire stations, etc. *in perpetuity*.

Your Commission, the City Council, and the public are entitled to know whether the costs to serve those new homes will be greater or less than the expected tax revenue. Until your Commission has that information, it’s irresponsible to approve this plan.

#### **V. Your Commission cannot legitimately make findings required by the Fresno Municipal Code.**

Section 15-5812 of the Fresno Municipal Code provides that the Planning Commission **shall not** recommend approval of an application for a Plan Amendment unless the proposal meets Criteria A, B *and* C. The requirement is that the Plan meet all three criteria to be approved; this Plan meets none of them.

Two challenges for this Commission in this part of your role:

- 1) You cannot approve findings if there is **evidence in the record** that the SEDA Plan **conflicts** with any of the General Plan goals and/or policies.

Section 15-5812 requires that you **shall not** recommend an application unless the proposed Rezone or Plan Amendment is consistent with the General Plan goals and policies, any operative plan, or adopted policy. So, it is not enough that the SEDA Plan is consistent with **some** of the General Plan—it also, obviously, must not **conflict** with any of the General Plan.

- 2) Can you identify **evidence in the record** that **proves** each element of every Finding you make?

Your Findings of compliance with the Municipal Code are also governed by the substantial evidence standard: each Finding must be supported by “facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts.” This is a high standard, as is appropriate for an important decision. You must be satisfied that the City has met that standard in order to find compliance with the Municipal Code.

**a. Criterion A: consistency with the General Plan goals and policies, any operative plan, or adopted policy.**

Exhibit K, the Proposed Findings, acknowledges that it addresses only a few of the “Elements of the General Plan in [sic] which the Specific Plan is in compliance.” However, it omits many Objectives with which the SEDA Plan actively conflicts, or which the SEDA Plan would actively defeat. What follows are only a few examples.

**i. There is no evidence to support a Consistency Finding for the following Objectives:**

- *ED-5: Achieve fiscal sustainability.* To find the Plan in compliance with this Objective, you would have to have both the infrastructure budget with financing plan, and the Fiscal Impact Analysis. You have neither, and neither the EIR nor the Plan provides facts, let alone details, about how exactly “the Specific Plan is to achieve fiscal responsibility by providing a self-financing mechanism for the development and maintenance of the Southeast Development Area.” Without the facts, you cannot approve. Significantly, the EIR’s General Plan Consistency Analysis does not assert that the Plan is consistent with this General Plan Objective<sup>17</sup>.
- *ED-5-b: Fair and Proportional Payments. Require new residential and commercial development that requires annexation to the City to pay its fair and proportional share of needed community improvements through impact fees, assessment districts, and other mechanisms. Approve new residential and commercial development projects that require annexation to the City only after making findings that all of the following conditions are met:*
  - *No City revenue will be used to replace or provide developer funding that has or would have been committed to any mitigation project;*
  - *The development project will fully fund public facilities and infrastructure as necessary to mitigate any impacts arising from the new development;*
  - *The development project will pay for public facilities and infrastructure improvements in proportion to the development’s neighborhood and citywide impacts; and*
  - *The development will fully fund ongoing public facility and infrastructure maintenance and public service costs.*

These requirements are mandatory and very specific. They require that you have evidence before you that this Plan meets each requirement. You have no such evidence, and in fact have every reason to believe based on the Mayor’s statements on May 1 at the City Council workshop that this Plan violates these requirements. You cannot at this point therefore make a Consistency Finding.

- *UF-14: Create an urban form that facilitates multi-modal connectivity.* There is no evidence in the Plan or the EIR that “multimodal transportation” for SEDA is anything but catchy planner-speak. Please see comments above, at page 7, re: transportation network.

---

<sup>17</sup> Exh. J, PEIR, p. 3.11-24 – 25 (pdf pp. 530-531), Table 3.11-1: General Plan Consistency Analysis.

- *LU-5: Plan for a diverse housing stock that will support balanced urban growth, and make efficient use of resources and public facilities.* There is no evidence in the Plan or the EIR that SEDA plans for a “diverse housing stock”; please see comments above at page 6 re: housing affordability in SEDA. The Plan itself is inconsistent with “balanced urban growth” in that its proposed density at the far fringe of the city will distort the city’s form, as well as its budget. There is no evidence in the Plan that SEDA will “make efficient use of resources and public facilities”; on the contrary, running more than a billion dollars’ worth of sewer and water lines out to a lightly populated area beyond the city limits is the very definition of *inefficient* and *wasteful*.
- *MT-8: Provide public transit options that serve existing and future concentrations of residents, employment, recreation and civic uses and are feasible, efficient, safe, and minimize environmental impacts.* See, above comments re: UF-14 and at page 7 re: transportation network.
- *PU-4: Ensure provision of adequate trunk sewer and collector main capacities to serve existing and planned urban development, consistent with the Wastewater Master Plan.* See, above comments re: ED-5 and LU-5 re: public facilities.
- *H-2: Assist in the development of adequate housing to meet the needs of extremely low-, very low-, and moderate-income households.* See, above comments re: LU-5 and at page 6 re: housing affordability.

**ii. The SEDA Plan *fatally conflicts* with the following Objectives, such that this Commission cannot legitimately make a Consistency Finding:**

- *UF-6: Support new development in the Downtown through investment in public infrastructure.* As the Mayor pointed out, the SEDA Plan will be massively expensive, and the burden of the investment will fall on the City’s general fund and its ratepayers. The Governor’s promised \$200 million for downtown infrastructure is not in the State budget; adoption of the SEDA Plan will thus put it in direct competition with downtown for infrastructure dollars, swamping any possibility there will be funding for both.
- *LU-1: Establish a comprehensive citywide land use planning strategy to meet economic development objectives, achieve efficient and equitable use of resources and infrastructure, and create an attractive living environment.* The massive cost of SEDA undermines the possibility of “efficient and equitable use of resources and infrastructure.” See, above comments re: LU-5.
- *LU-1-a Promote Development within the Existing City Limits as of December 31, 2012.* Promote new development, infill, and rehabilitation of existing building stock in the Downtown Planning Area, along BRT corridors, in established neighborhoods generally south of Herndon Avenue, and on other infill sites and vacant land within the City. SEDA flips this focus from existing areas to an annexation area not even part of the City.

- *LU-1-c: Provision of Public Facilities and Services. Promote orderly land use development in pace with public facilities and services needed to serve development. See above, comments re: ED-5-b*
- *LU-1-e Annexation Requirements. Adopt implementing policies and requirements that achieve annexations to the City that conform to the General Plan Land Use Designations and open space and park system, and are revenue neutral and cover all costs for public infrastructure, public facilities, and public services on an ongoing basis consistent with the requirements of ED-5-b. See above, comments re: ED-5-b.*
- *RC-4: In cooperation with other jurisdictions and agencies in the San Joaquin Valley Air Basin, take necessary actions to achieve and maintain compliance with State and federal air quality standards for criteria pollutants. Vehicle Miles Traveled (VMTs) are the principal source of air pollution in our Valley. The Plan as written egregiously underestimates VMTs; even at the claimed reduced levels, the Plan proposes severe and unmitigated increases in criteria air pollutants. See, Exh. I, pp. 436-437, Swape Report re: SEDA air quality impacts; see also, Exh. I, comment letter submitted by Patience Milrod on behalf of the Central Labor Council of Fresno Madera Tulare Kings and Regenerate California Innovation, at pp. 804-810, re: SEDA air quality impacts, and at pp. 801-803 re: inaccurate VMT assessment.*
- *RC-5: In cooperation with other jurisdictions and agencies in the San Joaquin Valley Air Basin, take timely, necessary, and the most cost-effective actions to achieve and maintain reductions in greenhouse gas emissions and all strategies that reduce the causes of climate change in order to limit and prevent the related potential detrimental effects upon public health and welfare of present and future residents of the Fresno community. This project will deliver half a billion tons of greenhouse gases into the environment, torpedoing local goals for GHG reductions. The PEIR includes no mitigation measures for this impact. See, Exh. I, pp. 35-37, March 24, 2025, comment letter submitted by Douglas Carstens and Michelle Black on behalf of the Sierra Club, Central Valley Partnership, and League of Women Voters that relate to the PEIR’s assessment, analysis, disclosure, and mitigation of greenhouse gas emissions due to SEDA projects’ construction and operation activities.*

**b. Criterion B: consistency with the purpose of the Development Code to promote the growth of the city in an orderly and sustainable manner and to promote and protect the public health, safety, peace, comfort, and general welfare.**

The Development Code is generally a very precise guide to how our built environment must be constructed. However, it also requires fiscal self-sufficiency for annexation projects:

Municipal Code § 15-6104. ANNEXATION CRITERIA.

Annexation shall not be approved unless the proposed annexation meets all of the following criteria:

...

- B. Plan Consistency.** The proposed annexation and parcel configuration is consistent with the General Plan, the Fresno County Airport Land Use Compatibility Plan (as may be amended) adopted by the

Fresno County Airport Land Use Commission pursuant to California Public Utilities Code Sections 21670-21679.5, Concept Plan, and any applicable operative plan; and

**C. Revenue Neutrality.**

1. **Public Services, Facilities, and Utilities.** Adequate public services, facilities, and utilities meeting City standards are available to the lands proposed for annexation or will be provided within a specific period of time, with financial guarantees and performance requirements, to ensure this will occur.
2. **Fair and Proportional Payments.** Projects requiring annexation will not negatively impact City finances.
  - a. No City revenue will be used to replace or provide developer funding that has or would have been committed to any mitigation project.
  - b. The development project will fully fund public facilities and infrastructure as necessary to mitigate any impacts arising from the new development.
  - c. The development project will pay for public facilities and infrastructure improvements in proportion to the development's neighborhood and citywide impacts.
  - d. The development will fund its proportionate share of public facility infrastructure, maintenance and public service costs according to the City Council approved Development Impact Fee Schedule and through a uniform application of community facilities district...

As noted above, your Commission does not have any evidence whatsoever that this Plan is consistent with these provisions of the Development Code. Your Commission cannot therefore factually find that the SEDA Plan is consistent with the Development Code, within the meaning of Municipal Code § 15-5812.

**c. Criterion C: The change in land use is consistent with the Fresno General Plan in that it will contribute to achieving a balance between infill and greenfield growth.**

There are many ways to balance greenfield and infill growth. This proposal crashes the scale on the side of greenfield growth, and effectively sucks up all the resources that might otherwise have supported greenfield growth in the West Area, as well as infill growth.

The 2014 General Plan made clear that the City's historical craving for greenfield growth had borne grievous consequences, and that the City's focus must be reversed:

"Continued growth outwards creates transportation and air quality issues, as well. The continued siting of major retail and commercial uses, as well as jobs, at Fresno's urban fringe is lengthening travel times and increasing traffic levels (and air pollution) disproportionately faster than the rate of population growth, due to inefficient location selection. Given the restrictions on and impacts of increasing Fresno's land area, the General Plan promotes the highest and best use of land within Fresno's current city limits, phases growth into unincorporated areas of the SOI, and avoids de-investment in Downtown and established neighborhoods. Furthermore, certain patterns of land development can increase costs to the City in excess of related revenues and essentially

reduce fiscal resources. The Plan seeks to discourage this type of development and, at the least, ensure that all development covers its fair share of public costs.”<sup>18</sup>

The SEDA Plan is irredeemably inconsistent with this declaration in the General Plan, and precludes your Commission from making a finding of General Plan Consistency in compliance with the Municipal Code.

**VI. “South SEDA” is not an adoptable option at this time.**

We understand that the Mayor has floated the idea of prioritizing just the southernmost segment of the plan: “South SEDA, and only South SEDA,” he said in his remarks at the Council workshop on May 1. Now we hear a suggestion that there could be some kind of “phasing” or “staging” of development, with South SEDA going first.

As your Commission will well understand, adoption of the entire 9,000-acre SEDA Plan in fact opens the door to development throughout the Plan area. On any given Thursday, a future Council can approve a development proposal that is consistent with the Specific Plan. This proposed compromise does not solve the many deficiencies of the PEIR, and puts the City at risk for astronomical unreimbursed expenditures, based on the Plan’s own plain language.

The EIR promises a “Phasing Plan” *after* adoption of the Plan and certification of the EIR.<sup>19</sup> However, the Specific Plan should be updated now to incorporate the phasing plan, which would allow the PEIR to assess the extent to which a proposed phasing will help mitigate the impacts of the project. Moreover, under CEQA, such an assessment will constitute a significant change in the project description, and will require substantial revisions of the Environmental Impact Report to reflect the changed conditions, and recirculation.

**We therefore request, if you are inclined to consider the South SEDA alternative, that you return the matter to staff with directions to revise the Plan, and revise and recirculate the PEIR for analysis consistent with the proposed reduced footprint of the project.**

**VII. Conclusion**

There are conflicting claims here. You need, but do not have, the evidence – the Fiscal Impact Analysis, the Public Facilities Financing Plan, and the City’s responses to the numerous public comment letters submitting evidence and expert analysis that strongly contradict the EIR’s claims.

The missing evidence is especially important, because it will allow you to begin to assess the questions you must answer: whether SEDA will actually support itself; whether spending on SEDA will hurt existing City neighborhoods and taxpayers; and whether the true level of

---

<sup>18</sup> Fresno 2014 General Plan, Ch.7, Resource Conservation & Resilience – §7.2 Use of Infrastructure & Resources, p. 7-7.

<sup>19</sup> “The Phasing Plan defines the required sequence of development for various areas within SEDA.” See, Exh, J, SEDA PEIR, “Additional Project Components,” p.2-3 (pdf p. 205).

housing demand actually justifies the massive investment in SEDA.

I respectfully suggest you continue this matter until you can make Factual Findings based on a complete understanding of all the evidence. To do that, of course first you will have to **have** all the evidence, you will have to review it, you will have to weigh it to see which evidence is believable, and on that basis finally determine whether the Plan meets all of the criteria in the Municipal Code.

Even if, since last Friday, you have had a chance to read the thousands of pages in your agenda packet (which seems both unreasonable and disrespectful to this Commission), there is a great deal of essential information simply missing. You wouldn't buy an older home without a termite inspection, or make an important business decision without having the information to feel secure about the long-term wisdom of the investment.

I respectfully request this letter and attachment be incorporated into the record of this matter. Thanking you for consideration of these comments, and for your public service, I remain,

Very truly yours,

*Patience Milrod*

PATIENCE MILROD

cc: Fresno City Planning Department, by email to [Sophia.Pagoulatos@fresno.gov](mailto:Sophia.Pagoulatos@fresno.gov)  
Dillon Savory, Central Labor Council of Fresno, Madera, Kings & Tulare  
Keith Berghold, Regenerate California Innovation

# 2060 GROWTH PROJECTIONS

## INTRODUCTION

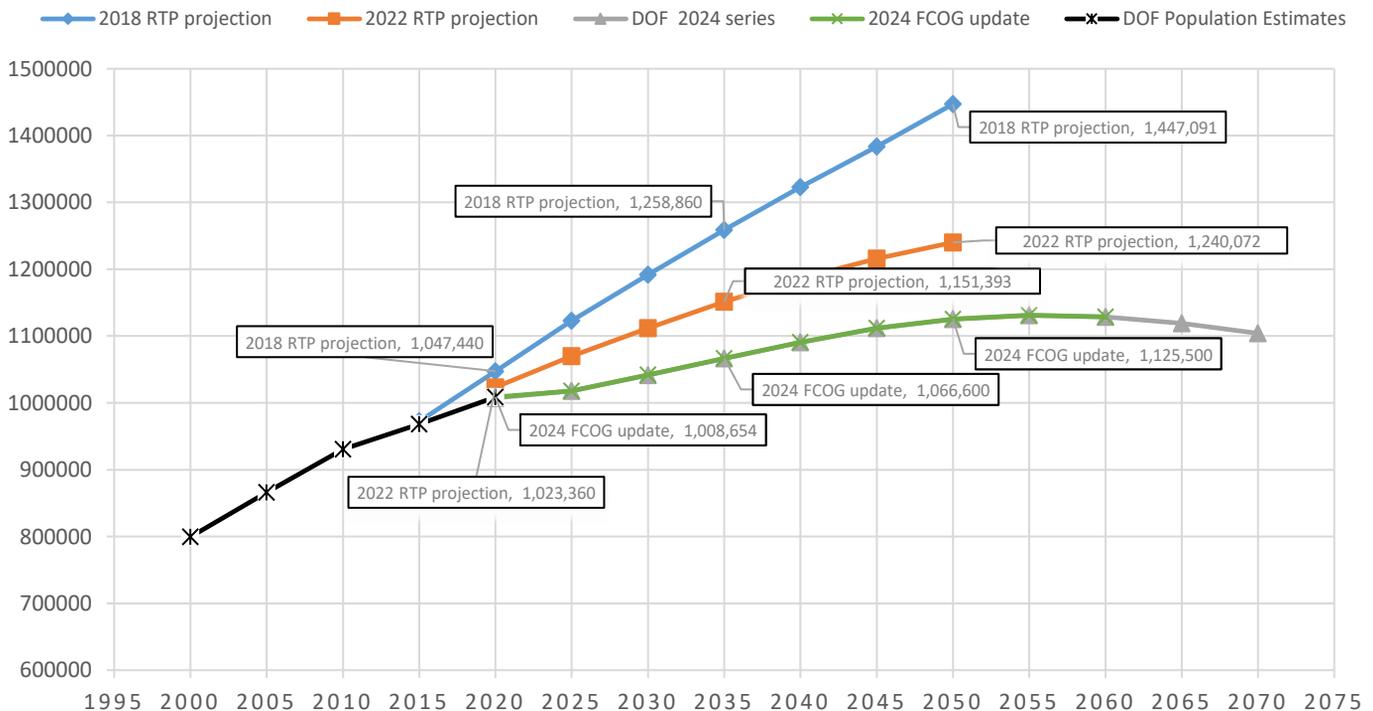
This report presents updated projections for employment, population, housing and demographic characteristics for the Fresno County region. The current projections update the base year to 2022 and extend the projections to 2060. And the age group, sex, race, and ethnicity data for each jurisdiction have been updated based on the 2020 Census. The study process included outreach to the jurisdictions in the county to review local planning policies and development trends.

## COMPARISON TO PRIOR PROJECTIONS

The updated projection indicates slower population growth, primarily due to revised vital statistics showing that the birth rate has been steadily declining since the early 2000s. Compared to the projection used in 2022 RTP, the updated forecast projects that Fresno County would have 7% less population in 2035, 9% less population in 2050, and 53% less population growth from 2020 to 2035, 45% less population growth from 2020 to 2050.

Figure below shows the population estimations since year 2000, and comparison to prior projections applied in Fresno COG' 2018 and 2022 RTPs, which aligned with historical DOF projections.

## FRESNO COUNTY POPULATION PROJECTION - HISTORICAL & 2024 UPDATE



May 20, 2025

Fresno City Planning Commission  
Peter Vang, Chair  
Kathy Bray, Vice Chair  
Rev. David Criner, Commissioner  
Monica Diaz, Commissioner  
Jacqueline Lyday, Commissioner  
Linda M. Calandra, Commissioner  
Gurdeep Singh Shergill, Commissioner

*by email to [clerk@fresno.gov](mailto:clerk@fresno.gov)*

RE: Public comment and **request to continue hearing**  
Re: Southeast Development Area Plan  
May 21, 2025 Planning Commission Agenda

Dear Chairman Vang and Fresno City Planning Commissioners,

I am a property owner in the Southeast Development Area and I respectfully submit the following comments, and request that this matter be delayed until you have all the accurate and complete information on which to make a responsible recommendation to the City Council.

Information about the cost of the plan and its infrastructure have been held by the City and has not been made available for review, which is needed for you to make a complete and accurate decision on the project. Just recently a study of market demand claims to support the plan but it appears to be defective and misleading. Time is needed to adequately review this study so as to be able to make a responsible recommendation. The responses to the comments on the Draft EIR will not be made available to you and only released 10 days prior to the City Council's consideration of this project. You need to have this information prior to your consideration of this plan to make a responsible recommendation. You must ask:

Why is there such a rush to push this project through when projects already in progress have enough space to meet the inflated projected housing needs? For example, the City's own West Area Neighborhoods Specific Plan shows a capacity for 50,000 new homes, which is more than the 45,000 homes projected for the SEDA. That plan is active and has not been highly contested as has SEDA.

Why is the City not being transparent about: the amount of pollution produced by this project; the increased and worsened traffic; investment in urban sprawl instead of existing neighborhoods; and increasing city debt for infrastructure in outlying areas instead of maintaining the existing city proper?

Why is the City so anxious to put affordable housing away from the city where public transportation, shopping, and health care are nearby and already available?

Is there enough population growth to justify the development of SEDA. Does it make sense to use agricultural land for affordable housing when there are enough open areas within the City to meet those needs?

The adoption of this plan will have serious consequences for, not only the Southeast Development Area, but the City of Fresno as well.

It will take agricultural land out of production, affecting the livelihood of many families and ethnic groups.

It will increase pollution and increase greenhouse gas by decreasing the vegetation in the area.

The cost to develop the infrastructure for this plan will shift funds away from maintenance and improvement of the existing infrastructure of the City.

We are asking that you insist on having all the relevant information pertinent to the SEDA project and have the time needed to make the right decision with factually supportable findings and recommendations. We respectfully request that you decline to act at this time, and continue the matter until all relevant information has been made available and an appropriate public comment period be made available.

I respectfully request this letter be incorporated into the record of this matter. Thank you for consideration of these comments and for your public service.

Yours,

*David Ramming*

Dr. David Ramming

Southeast Property Owners Vice President

May 20, 2025

From: Helen Ramming, 207 N Locan Ave, Fresno, CA 93737

RE: Public comment and request to continue hearing  
Regarding: ID 25-657 Southeast Development Area Plan  
May 21, 2025 Planning Commission Agenda

Dear Chairman Vang and the Fresno City Planning Commissioners,

As a property owner of farmland in the proposed annexation plan, I am submitting my concerns in opposition to the proposed SEDA plan. My request is that the Planning Commission not endorse the SEDA Plan as written for the following reasons:

1. There is no need to push this through with the urgency conveyed. A proposal of this magnitude which affects all aspects of the City of Fresno should be analyzed until it is confirmed that it will benefit the city as a whole. Why is the Planning Staff pressuring for immediate acceptance of the plan?
2. A proposal of this magnitude should have a financial budget. Why should the government have unlimited spending if private citizens could never operate like this? Why has there been no budget publicized? Is the Fresno Planning Staff endorsing another "high speed rail" project?
3. Since the Fresno Planning Staff is a public agency, why has the involvement of the public to improve the plan met with so much resistance? Why have they not operated with transparency? What are they hiding?
4. There are numerous discrepancies within the plan. These need to be addressed and corrected before moving forward. (Fresno's projected growth, the pollution increase, etc.)
5. The EIR comments should be addressed prior to the ten day time period required before the council. The opposition of this degree should be taken into serious consideration and not taken lightly or intentionally pushed aside.
6. Why are we ready to develop 45,000 homes in the SEDA Plan, when the Fresno West Area Neighborhoods Specific Plan can already accommodate that number without taking extensive farm land?
7. Why is there a push for more housing when the growth rate of Fresno is declining?
8. This is prime agriculture land. Why are we developing it when it cannot be replaced? We understand equivalent acreage needs to be set aside to replace this. Why has nothing been done?

Because of the above reasons and the fact that the SEDA plan will harm Fresno instead of benefiting the city, I request that the SEDA Plan is not recommended for approval by the planning commission.

Sincerely,

Helen Ramming

From: Dr. David Ramming, 207 N Locan Ave, Fresno, CA 93737

RE: Public comment and **request to continue hearing**  
Re: ID 25-657 Southeast Development Area Plan  
May 21, 2025 Planning Commission Agenda

Dear Chairman Vang and Fresno City Planning Commissioners,

I am a property owner in the Southeast Development Area and I respectfully submit the following comments, and request that this matter be delayed until you have all the accurate and complete information on which to make a responsible recommendation to the City Council.

Information about the cost of the plan and its infrastructure have been held by the City and has not been made available for review, which is needed for you to make a complete and accurate decision on the project. Just recently a study of market demand claims to support the plan but it appears to be defective and misleading. Time is needed to adequately review this study so as to be able to make a responsible recommendation. The responses to the comments on the Draft EIR will not be made available to you and only released 10 days prior to the City Council's consideration of this project. You need to have this information prior to your consideration of this plan to make a responsible recommendation. You must ask:

Why is there such a rush to push this project through when projects already in progress have enough space to meet the inflated projected housing needs? For example, the City's own West Area Neighborhoods Specific Plan shows a capacity for 50,000 new homes, which is more than the 45,000 homes projected for the SEDA. That plan is active and has not been highly contested as has SEDA.

Why is the City not being transparent about: the amount of pollution produced by this project; the increased and worsened traffic; investment in urban sprawl instead of existing neighborhoods; and increasing city debt for infrastructure in outlying areas instead of maintaining the existing city proper?

Why is the City so anxious to put affordable housing away from the city where public transportation, shopping, and health care are nearby and already available?

Is there enough population growth to justify the development of SEDA. Does it make sense to use agricultural land for affordable housing when there are enough open areas within the City to meet those needs?

The adoption of this plan will have serious consequences for, not only the Southeast Development Area, but the City of Fresno as well.

It will take agricultural land out of production, affecting the livelihood of many families and ethnic groups.

It will increase pollution and increase greenhouse gas by decreasing the vegetation in the area.

The cost to develop the infrastructure for this plan will shift funds away from maintenance and improvement of the existing infrastructure of the City.

We are asking that you insist on having all the relevant information pertinent to the SEDA project and have the time needed to make the right decision with factually supportable findings and recommendations. We respectfully request that you decline to act at this time, and continue the matter until all relevant information has been made available and an appropriate public comment period be made available.

I respectfully request this letter be incorporated into the record of this matter. Thank you for consideration of these comments and for your public service.

Yours,

*David Ramming*

Dr. David Ramming

Southeast Property Owners Vice President

May 20, 2025

Fresno City Planning Commission  
Peter Vang, Chair  
Kathy Bray, Vice Chair  
Rev. David Criner, Commissioner  
Monica Diaz, Commissioner  
Jacqueline Lyday, Commissioner  
Linda M. Calandra, Commissioner  
Gurdeep Singh Shergill, Commissioner

by email to [clerk@fresno.gov](mailto:clerk@fresno.gov)

RE: Public comment and request to continue hearing  
Regarding: Southeast Development Area Plan  
May 21, 2025 Planning Commission Agenda

Dear Chairman Vang and the Fresno City Planning Commissioners,

As a property owner of farmland in the proposed annexation plan, I am submitting my concerns in opposition to the proposed SEDA plan. My request is that the Planning Commission not endorse the SEDA Plan as written for the following reasons:

1. There is no need to push this through with the urgency conveyed. A proposal of this magnitude which affects all aspects of the City of Fresno should be analyzed until it is confirmed that it will benefit the city as a whole. Why is the Planning Staff pressuring for immediate acceptance of the plan?
2. A proposal of this magnitude should have a financial budget. Why should the government have unlimited spending if private citizens could never operate like this? Why has there been no budget publicized? Is the Fresno Planning Staff endorsing another "high speed rail" project?
3. Since the Fresno Planning Staff is a public agency, why has the involvement of the public to improve the plan met with so much resistance? Why have they not operated with transparency? What are they hiding?
4. There are numerous discrepancies within the plan. These need to be addressed and corrected before moving forward. (Fresno's projected growth, the pollution increase, etc.)
5. The EIR comments should be addressed prior to the ten day time period required before the council. The opposition of this degree should be taken into serious consideration and not taken lightly or intentionally pushed aside.
6. Why are we ready to develop 45,000 homes in the SEDA Plan, when the Fresno West Area Neighborhoods Specific Plan can already accommodate that number without taking extensive farm land?

7. Why is there a push for more housing when the growth rate of Fresno is declining?
8. This is prime agriculture land. Why are we developing it when it cannot be replaced?  
We understand equivalent acreage needs to be set aside to replace this. Why has nothing been done?

Because of the above reasons and the fact that the SEDA plan will harm Fresno instead of benefiting the city, I request that the SEDA Plan is not recommended for approval by the planning commission.

Sincerely,

Helen Ramming

**From:** Brett Thompson <[thompsonmobileweld@gmail.com](mailto:thompsonmobileweld@gmail.com)>

**Sent:** Tuesday, May 20, 2025 5:01 PM

**To:** Clerk <[Clerk@fresno.gov](mailto:Clerk@fresno.gov)>

**Subject:** SEDA Planning Commission comment

**External Email:** Use caution with links and attachments

## – Southeast Development Area Specific Plan



Can Fresno grow in ways that equitably expand our economy and housing stock while protecting public health? Can “greenfield” growth occur that pays its own way and does not negatively affect existing neighborhoods? Can we build communities where schools, shopping, and parks are within walking distance of every student, worker, and resident? Can we attract and keep highly educated workers and raise the collective potential of our diverse population?

The answer to all these questions is YES.



Clerk please forward this to planning commissioners in regards to the SEDA Plan presentation to the planning commissioners tomorrow evening.

Written Testimony of:

Brett Thompson

8612 E. Olive Ave

Fresno, Ca 93737

Breakdown of the “SEDA plan” as proposed to residents should help decision making officials understand where our residents concerns and opposition is coming from.

Residents have voiced our concerns to the SEDA plan and EIR adequate responses have not been given to our questions. Residents concerns have been labeled by planning staff as “Myths”

The first page of the City’s plan (see attachment) asks:

1. Can Fresno grow in ways that equitably expand our economy and housing stock while protecting public health? —

Definition of equitably : in a fair and [impartial](#) manner.

City planning staff is not portraying the entire plan: not a single negative effect was conveyed in the SEDA Workshop presentation by planning staff, information was heavily slanted, funding / budget information and Vehicle Miles Traveled studies have been withheld from citizens and City Council members. Transparency is absent. Continuing to plan SEDA diverts much needed attention, services, and funding away from inner city planning and maintenance needs.

The potential 500,000 TONS of carbon emissions produced annually, noise pollution, increased traffic, light pollution, and disruption of rural lifestyles are not protecting public health. What is the point of building 45,000 homes if the result leads to air quality un healthy to live in?

1. Can "greenfield" growth occur that pays its own way and does not negatively affect existing neighborhoods? Can we build communities where schools, shopping, and parks are within walking distance of every student, worker, and resident? Can we attract and keep highly educated workers and raise the collective potential of our diverse population?—  
Building low income housing , Affordable housing, and job creating businesses will not bring in the

property taxes needed to fund the SEDA expansion and public services as these types of buildings oftentimes receive property tax exemptions.

Issuing bonds / borrowing money to fund new infrastructure while the existing city has a \$50million budget deficit and nearly \$1.5billion in deferred maintenance is not “pay its own way” the SEDA plan is a financial burden on new and existing residents. With the City of Fresno’s infrastructure experiencing compounding years of deferred maintenance, how can the City of Fresno assure existing Southeast property owners their infrastructure needs will be met while at the same time neglecting and deferring inner city infrastructure obligations?

Forcing existing residents to condemn our current water wells and septic then forcing existing residents to pay for hook-up to city water and sewer services is a negative effect on existing neighborhoods and is not “pay its own way”. The legal process of forcing residents to condemn their existing utilities involves “eminent domain”, a practice planning staff has asserted would NOT be used within their plans for SEDA.

The plan relies on lowering vehicle miles Traveled through walkable neighborhoods in relation to schools, work, parks, and shopping. Yet the plan to build 45,000 homes and supply 37,000 jobs only computes to .822 jobs per household( without job competition from employees living outside of SEDA), less than the suggested 1:1 ratio by planning staff. Surrounding school districts do not have the bonding capacity to fund new school infrastructure for future SEDA students.

The proposed map is absent of retail / shopping destinations and a master trails plan. New residents are unlikely to walk home from the grocery store or retail store lugging groceries and necessities home. A study to determine percent of residents who walk to, use public transportation, or vehicle miles to shop has not been presented yet the entire plan revolves around walkable proximity living.

Planning staff suggests the SEDA plan would lower vehicle miles traveled to 5 due to proximity of living, shopping, and work. This number is unattainable when compared to California’s lowest VMT cities in the Bay Area at 10, considering these cities have public rapid transit systems in place where SEDA does not.

Yet, The City’Planning staff’s answer to all these questions is YES. While Residents of Fresno say No!

**From:** Mary Aldern <maldern2013@gmail.com>

**Sent:** Tuesday, May 20, 2025 11:27 PM

**To:** PublicCommentsPlanning <PublicCommentsPlanning@fresno.gov>

**Subject:** Comment for Planning Commission Meeting Agenda Item VIII B Wed 5/21/25

**External Email:** Use caution with links and attachments

Hello,

My name is Mary Aldern and I am a resident and homeowner in the Jackson community. I would like to encourage the city planning commission and the city council to vote against SEDA. We just don't know if such a development will help the City Of Fresno and there are too many places already currently in the City Of Fresno that are being improved but desperately need more city support. The idea of getting more property tax by making a brand new development area is ludicrous when there are not enough resources to support that addition to the population while at the same time, completing all necessary and wanted projects in existing neighborhoods. We need more swimming pools or pool hours ant existing summer pools so every resident, young and old, can swim at the hot parts of the morning, noon and evening during those parts of the year that high temperatures are an issue. This is what makes coastal and resort towns so popular. This is what we need to create and develop for ourselves, and shaded bicycle trails with water features that will encourage good people to move here. We do not need more neighborhoods at the cost of unfinished projects and unbearable heat where there are still people literally dying in the heat. Let's create an environment that is sustainable and compassionate for our current population by thinking carefully about how to make it a livable and enjoyable place where people will be able to live and thrive, where existing residents and owners will stay and others will seek to move here.

Sincerely,

Mary Aldern

[maldern2013@gmail.com](mailto:maldern2013@gmail.com)

**From:** NATALIE ORTIZ <nortiz559@aol.com>

**Sent:** Wednesday, May 21, 2025 4:45 PM

**To:** PublicCommentsPlanning <PublicCommentsPlanning@fresno.gov>

**Cc:** dortiz559 <dortiz559@aol.com>; Sophia Pagoulatos <Sophia.Pagoulatos@fresno.gov>; Jennifer Clark <Jennifer.Clark@fresno.gov>

**Subject:** Item- VIII-B ID 25-657 05.21.25 Planning Commission Meeting Oppose SEDA

**External Email:** Use caution with links and attachments

Good afternoon,

Please accept this email as our opposition to the item VIII-B ID 25-657 on the Planning Commission agenda. In addition to this email, we submitted our lengthy written opposition to the City's Draft EIR. Please be aware as you decide on this item that our home is currently located on the research portion of the map; said map as you know allows no housing at all whatsoever. No one has been able to confirm that the city in fact will implement eminent domain. The city has also been able to tell us any cost associated with Seda. As you know, the city has bigger problems between homelessness, the audit being implemented by doge regarding the high-speed rail, and other areas within Fresno that need die attention before proceeding with the smart city.

Please provide answers to the southeast property owners to the following questions:

- 
- 

***“How can the City justify approving 9,000 acres of new development when so many of Fresno’s existing neighborhoods—still***

***lack sidewalks, streetlights, and basic storm drainage?”***

***“What’s the projected cost to build and maintain the infrastructure for SEDA, and where exactly will that money come from?”***

***“Has the City completed a full fiscal impact analysis showing how SEDA will affect Fresno’s long-term budget, especially our already overstretched General Fund?”***

***“Instead of SEDA, why are you not investing in implementing the [West***

***Area, Southwest Fresno, or other] Specific Plan that’s already been developed with community input?”***

***“How does SEDA align with the City’s own General Plan goals for infill***

***development and reinvestment in the urban core?***

***“How will SEDA address the current infrastructure crisis in Fresno’s existing neighborhoods already experiencing blight and decay?***

***“The City hasn’t released an Infrastructure Financing Plan or detailed cost breakdown—how can you justify approving a plan of this scale without that basic information?”***

***“Why is the City prioritizing sprawl development while leaving behind***

***neighborhoods like [insert your community] that have been waiting decades for promised improvements?”***

***“With Fresno’s population growth rate dropping, what justifies developing 45,000 new homes in undeveloped farmland?”***

***“What protections will be in place to ensure SEDA doesn’t siphon off public funds, attention, and services from already struggling communities?”***

***For all the reasons stated above, and N are written opposition to the draft EIR we ask that you oppose this item and oppose SEDA.***

***Thank you,***

***David, Natalie, Elijah Ortiz***

May 21, 2025

City of Fresno  
Planning Commission

Subject: Letter of Support for the South East Development Area (SEDA) Specific Plan

Submitted VIA Email

Dear Fresno City Council,

On behalf of the Building Industry Association of Fresno & Madera Counties (BIA F/M), we are writing to express our strong support for the South East Development Area (SEDA) Specific Plan. The BIA F/M is a non-profit trade association representing hundreds of builders, developers, subcontractors, consultants, engineers, suppliers, and other industry professionals involved in the planning, design, and construction of housing and other projects. Our 80+ members employ over 2,000 people and generate millions of dollars in Fresno's economy. We are committed to building quality, affordable housing and creating thriving communities in Fresno and the surrounding region.

After a careful review of the Housing Market Demand & Segmentation Analysis conducted by Clarity Real Estate Advisors, the BIA believes the SEDA Specific Plan is a crucial step forward in addressing the growing housing needs of the City of Fresno. We are encouraged by the findings of the market analysis, which highlights the area's potential to capture a significant portion of future housing demand.

The BIA F/M recognizes the critical importance of increasing the supply of market-rate housing to control escalating home prices and provide more options for residents of the City of Fresno. The SEDA Specific Plan, as outlined in the Housing Market Demand & Segmentation Analysis report, provides a framework for achieving this goal through thoughtful land use planning and a diverse range of housing types. The market analysis projects a substantial demand for new housing units in SEDA, comprising both single-family detached and multi-family options, with a significant proportion dedicated to market-rate housing, to help provide options for the residents of the City of Fresno.

Moreover, the development of SEDA will create a substantial number of new jobs in the construction and building industry and supporting businesses, contributing to the economic growth of the region. Additionally, market-rate housing generates a significant property tax that contributes to Fresno's General Fund which pays for essential city services. Market-rate housing must be a top priority for Fresno's future. The BIA F/M and its members are ready and eager to participate in the construction of this community in Southeast Fresno.

We also recognize that the SEDA Specific Plan has been in development for over two decades, representing a significant investment of time, resources, and collaboration from various

stakeholders. This long-term planning effort demonstrates a commitment to responsible growth and a vision for a sustainable future for the City of Fresno. The Housing Demand & Segmentation Analysis report recommends that planning for new for-sale housing be introduced in SEDA starting as early as 2030, and certainly by 2035 to maintain a steady supply of new housing in the southeastern portion of the city.

The BIA believes that the SEDA Specific Plan is essential for addressing Fresno's housing challenges, fostering economic development, expansion of Fresno's taxbase and creating a vibrant, sustainable community for future generations. We strongly urge the City Planning Commission to approve the SEDA Specific Plan and move forward with its implementation.

Thank you for your time and consideration.

Sincerely,

Darren C. Rose  
President & CEO  
Building Industry Association of Fresno/ Madera Counties