

SEDA Slide Deck for City Council Workshop – May 1, 2025 – Comments on Some City Staff Slides and Their Version of ‘FACTS’

Slide No.	Left Column Slide Title	SEDA Staff Content	Greenfield Coalition Comments about City Staff Opinions
16	SEDA Draft Specific Plan Why Now?	1. Housing Crisis: • 3.8% vacancy rate • 20% increase in home prices in 2022 2. Demand Exists: • 14,350 units by 2030 3. If SEDA not approved, piecemeal development will happen anyway	<p>NON-FACTUAL AND/OR INCOMPLETE: The Market Demand Analysis that apparently suggests demand for 14,350 units by 2030 has still not been released for public review after many requests to the City and Clarity Real Estate Advisors (the company that performed the analysis) It appears the analysis relies on questionable data, and the public should be able to review the study’s other assumptions and methodology, since this document forms part of the “factual basis” for Council’s decisions on the SEDA Plan and EIR.</p> <p>The slide erroneously posits that without SEDA there will be “piecemeal development” at some urban scale within the County’s jurisdiction. But this assumption defies LAFCO approval of SEDA inclusion in the City of Fresno Sphere of Influence (SOI).</p>
20	MYTH The SEDA Plan is based on incorrect population projections	FACT • Population projections for the SEDA are based on population projections in the Fresno General Plan. • The Fresno Housing Element documents Fresno’s population growth to be 1.2% from 2000 to 2022, in line with General Plan assumptions. • A market study prepared for the SEDA, and census data show population growth to be significantly higher than recent Department of Finance projections.	<p>NON-FACTUAL AND/OR INCOMPLETE: General Plan population projections are now out-of-date and inaccurate according to Fresno COG and CA Dept of Finance (DOF) updates released in 2024—current growth is not 1.2%, but 0.18% annually for Fresno County as a whole</p> <p>Housing Element population growth numbers cited look backward, not forward; the City’s March 2025 draft EIR for the West</p>

		<ul style="list-style-type: none"> • The SEDA phasing and development would be paced with current demand. 	<p>Area Neighborhood Specific Plan acknowledges the much slower (and accurate) future growth rate, citing U.S. Census Bureau and California State Department of Finance data showing Fresno’s growth at 0.2% as of 2024. (p. 3.12-1, Table 3.12.1)</p> <p>See Slide 16 comments above about Market Demand Analysis – year-to-year Census data population growth variability is normal and are not useful for systematic projections into the future. DOF projections take into consideration long-term trends and supporting evidence for changes in birth rates, mortality, immigration and emigration among other factors.</p>
21	<p>MYTH The SEDA is urban sprawl</p>	<p>FACT Urban growth has been envisioned in the SEDA area since the 1958 General Plan</p> <ul style="list-style-type: none"> • SEDA will rely on municipal services and infrastructure • Sprawl is discontinuous, piecemeal development 	<p>NON-FACTUAL AND/OR INCOMPLETE: When a city expands horizontally into farmland, it's a core characteristic of urban sprawl. Who serves it and whether it is discontinuous or piecemeal are not required definitional attributes. SEDA as and where it is proposed meets common definitions of sprawl.</p>
22	<p>MYTH The SEDA Plan will result in a reduction of City services</p>	<p>FACT</p> <ul style="list-style-type: none"> • Specific Plan policies call for self-financing • Potential financing mechanisms will be included in the Public Facilities Financing Options Report • The City Council will provide direction on potential funding mechanisms 	<p>NON-FACTUAL AND/OR INCOMPLETE: The public cannot know the facts about staff’s SEDA self-financing assertions without reviewing a SEDA Public Facilities Financing Plan and Comprehensive Fiscal Impact Analysis on long-term SEDA impacts on the City’s General Fund and levels of public services going forward– both of which have been requested many times and not provided by the City.</p>

23	<p>MYTH The SEDA will burden existing City neighborhoods or residents</p>	<p>FACT • As part of the recent tax sharing agreement with the County of Fresno, the tax apportionment ratio in the SEDA is 50%, compared to the balance of the Sphere of Influence, which is 40%. • In the previous tax sharing agreement with the County of Fresno, new development in the City received a tax apportionment ratio of 38%. • Increased property tax revenue funds additional services Citywide.</p>	<p>NON-FACTUAL AND/OR INCOMPLETE: The City of Fresno owns a Comprehensive Fiscal Impact Analysis tool prepared by Economic planning Systems – which is capable of evaluating SEDA impacts on the City’s General Fund and levels of public services going forward. The City used this model several years ago to evaluate the West Area Neighborhood Specific Plan – but has refused to apply it to SEDA, falsely claiming the tool was not suited to evaluating SEDA. Without systematic analysis of fiscal impacts, how can the City Council and public know factually what the fiscal trade-offs are, versus investing in other areas of the City and SOI?</p>
24	<p>MYTH The SEDA will not benefit existing City neighborhoods or residents</p>	<p>FACT • The SEDA would benefit existing City residents through higher taxes collected. • Fees paid by some existing neighborhoods: • Property tax • Lighting/landscape maintenance (LLMD) perimeter only • Community Facilities Districts (CFD) – interior and exterior maintenance • Fees paid by new neighborhoods (such as SEDA): • Property tax • CFD • Public safety CFD • Impact fees • Infrastructure district</p>	<p>NON-FACTUAL AND/OR INCOMPLETE: These are factually unsupported assertions by staff. If they have the facts, they should disclose them, so the Council and the public can fully review the SEDA Public Facilities Financing Plan and Comprehensive Fiscal Impact Analysis on long-term SEDA impacts on the City’s General Fund and levels of public services going forward - noted in the comments on Slides 22 and 23 above.</p>
25	<p>MYTH The SEDA will not benefit existing City neighborhoods or residents</p>	<p>City of Fresno Special District Map presented?</p>	<p>Not clear what assertions are being represented by map without explanation, which we assume will be offered in City Council workshop where the public cannot comment or ask questions.</p>
26	<p>MYTH The SEDA will result in blight within City limits</p>	<p>FACT • Planning and investment in the City’s infill areas is ongoing. • In accordance with the infill objectives of the General Plan, the City of Fresno has prioritized Community and Specific Plans within city limits. •</p>	<p>NON-FACTUAL AND/OR INCOMPLETE: Urban decay and blight are visually extreme and real cumulative negative conditions in Fresno that deleteriously impact private investment potential in the city. While significant deferred maintenance</p>

		Completed infill plans include: the Downtown Neighborhoods Community Plan, Southwest Fresno Specific Plan, Fulton Corridor Specific Plan • Plans currently underway include: the Tower District Specific Plan Update, West Area Neighborhoods Specific Plan, and Central Southeast Specific Plan.	is visually apparent – significant underground and otherwise inaccessible public infrastructure needs repair and updating – all of which require annual budget deliberation and actions which should be guided by factual comprehensive physical and fiscal assessments. Merely highlighting and referencing objectives and plans in this respect is inadequate and specious. Factual assessments and clear time-based priorities to address deficiencies are necessary, and should be constantly contrasted with pitches to invest scarce public resources in unnecessary and low fiscal ROI endeavors that do not measurably contribute to Fresno’s sustainability or competitiveness.
27	MYTH Agricultural operations will not be permitted to continue	FACT • The Specific Plan supports continued agricultural operations. • The Specific Plan reinforces the Fresno County Rightto-Farm Ordinance which applies to subdivisions within 300 feet of an Exclusive Agriculture, Limited Agriculture, Timberland Preserve or Resource Conservation Zone District, per Ordinance No. 87-010. • The Specific Plan will not affect the status of Williamson Act parcels.	NON-FACTUAL AND/OR INCOMPLETE: Comparing SEDA to the proposed West Area Neighborhoods Specific Plan (WANSP) - their respective recent draft EIRs provide clear assessments of farmland impacts. Both plans have Significant Unavoidable Impacts to farmland - with SEDA having 3 times the magnitude of total farmland to be impacted, 6,741 acres, versus 2,167.65 acres for the WANSP. It is hard to agree that SEDA supports continued agricultural operations, either on an absolute basis or when compared to more reasonable alternatives such as the WANSP.
30	MYTH Annexation of all 9,000 acres will occur immediately upon Plan approval	FACT • Adoption of a specific plan does not trigger annexation. • Annexations would occur incrementally as individual development applications are filed and are not anticipated to occur until necessary infrastructure is installed, which is estimated to occur after 2030. • The Local Agency Formation Commission	NON-FACTUAL AND/OR INCOMPLETE: Essentially SEDA is proposed with a piecemeal implementation strategy – which would be pragmatic if the entire 9,000-acre plan proposed had been comprehensively assessed for long-term fiscal, environmental, and other impacts. This is not the case – see comments on Slides 22 and 23

		(LAFCO) is the agency that approves or denies annexations.	above. Without complete assessments – the SEDA EIR and Plan are legally vulnerable to piecemealing charges under CEQA and do not pass the common sense filter it should.
32	MYTH The SEDA Plan will increase Vehicle Miles Traveled (VMT)	FACT • The SEDA Plan results in reduced VMT • The SEDA Plan incorporates a unique Mixed-Use land use pattern which puts jobs, schools and housing within walking distance to reduce VMT	NON-FACTUAL AND/OR INCOMPLETE: This is a counterfactual and unsupported assertion in the context of Fresno’s regional employment, post-secondary education, government and commercial services, entertainment and public transportation ridership. The SEDA draft EIR materially underestimates VMT by significantly overestimating trip capture within SEDA.
33	MYTH The SEDA Plan will increase carbon emissions	FACT • The SEDA Plan addresses carbon emissions through its unique Mixed-Use land use pattern, which puts jobs, schools and housing within walking distance to reduce vehicle trips and carbon emissions. • The alternative is continued development in surrounding jurisdictions farther from urban uses, which could lead to increased regional trips and worsened air quality.	NON-FACTUAL AND/OR INCOMPLETE: See comments above on Slide 32. SEDA would create an additional half-billion tons of carbon emissions every year, even given the land use patterns, etc. Clearly, the land use elements do NOT mitigate massive carbon emissions.
34	MYTH Approving the SEDA Plan will make us “sicker”	FACT • The SEDA Plan addresses air quality through its unique Mixed-Use District land use pattern, which puts jobs, schools and housing within walking distance in order to reduce vehicular emissions. • The alternative is continued development in surrounding jurisdictions farther from urban uses, which will lead to increased regional trips and worsened air quality.	NON-FACTUAL AND/OR INCOMPLETE: See comments above on Slides 32 and 33.
35	MYTH The SEDA Plan does not address reduction in farmland	FACT • The Environmental Impact Report requires preservation of farmland at a 1:1 ratio	NON-FACTUAL AND/OR INCOMPLETE: See comments above on Slide 27. There is no reason to assume from the Plan or EIR that implementation will be effective.

36	MYTH The SEDA does not have enough water to serve the area	FACT <ul style="list-style-type: none"> • A Water Supply Assessment (WSA) was prepared for the proposed Specific Plan and is included in Appendix I of the EIR. • According to the WSA, the SEDA Specific Plan will result in a 1.7% increase in water demand • Per the WSA, there will be sufficient water supply to compensate for this increase. 	No Comment – Except to note that long-term, the City will need all the water it can secure for economic development attraction and to sustain existing city areas.
37	MYTH The City is not responding to any prior comments received on the SEDA Environmental Impact Report	FACT <ul style="list-style-type: none"> • The City will be responding to all new environmental issues raised in the Final EIR • Additional analysis was conducted on environmental issues raised on the previously circulated Draft PEIR which is incorporated into the current 2025 draft • The SEDA EIR was released for public comment on the following dates: <ul style="list-style-type: none"> • July – August 2023 (Draft PEIR) • October – November 2023 (Recirculated Draft PEIR) • February – March 2025 • CEQA Guideline Section 15088.5(f)(1) provides that: <ul style="list-style-type: none"> • When an EIR is substantially revised and the entire document is recirculated, the lead agency may require reviewers to submit new comments and need not respond to those comments received during the earlier circulation period. 	NON-FACTUAL AND/OR INCOMPLETE: As a matter of courtesy and public trust, the City should have responded to 2023 public comment letters on the SEDA draft EIR. Many remain unaddressed in the current draft.
38	MYTH There is no demand for the SEDA and all future housing can be accommodated in City limits	FACT <ul style="list-style-type: none"> • A recent SEDA Housing Market Demand Analysis concluded that there is a demand for 14,350 housing units in SEDA in the 20-year period starting in 2030. • This analysis assumes that development will continue in the West, Southwest and North areas as well as infill in existing neighborhoods. • In the last 10 years, approximately 10,000 housing units have been built and 5,000 more proposed in Madera County, while the City of Fresno has only built 16,607 housing units from 2013 – 2023. 	NON-FACTUAL AND/OR INCOMPLETE: See comments above on Slides 16 and 20. The City's Housing Element conservatively calculates infill housing development capacity at over 40,000 dwelling units on vacant residential or ag-zoned parcels <u>within the existing City limits</u> . The West Area Neighborhoods Specific Plan and its recently recirculated draft EIR, indicate an additional greenfield housing development capacity of more than 50,000 units. The

			<p>Southwest Fresno Specific Plan also has additional greenfield housing development capacity.</p> <p>Why, again, is SEDA needed when the City's own analyses, adopted plans, and proposed plans calculate housing development capacities above 90,000 units <i>without a single unit in SEDA</i>?</p>
40	Public Facilities Financing Options Report	<p>City commissioned a Financing Options Report to assess the following:</p> <ul style="list-style-type: none"> • Land Use Assumptions • Phasing • Facilities Costs • Funding Sources • Analysis 	<p>NON-FACTUAL AND/OR INCOMPLETE:</p> <p>See comments above on Slides 22, 23, 24, and 26 above. Without reasonable time for the public to review and offer comments on key analyses required to make informed judgments – the City risks taking action without full information, either for decisionmakers or for the public.</p> <p>Phasing – just so developers can get a foothold within the SEDA area - without the comprehensive financing and fiscal impact assessments for the entire 9,000-acre planning project – appears irresponsible and a violation of City Council fiduciary duties.</p>
41	Next Steps	Start Small	Starting Small, in the context of comments offered above, appears have all the negative connotations, and fiscal, environmental, and legal risks of piecemealing.
Final Slide	Next Steps	<p>Specific Plan Adoption & EIR Certification</p> <p>SB2 Grant Closeout</p> <p>Zoning Code Update</p> <p>Parks and Open Space Master Plan</p>	The first next step should be to respond to all public comments and requests for underlying analyses and reports, a release of comprehensive fiscal impact analyses for the ultimate plan buildout, the infrastructure plan including financing details, and recirculation of a draft EIR that has corrected the fatal flaws of this draft.