



March 24, 2025

City of Fresno
Planning and Development Department
Sophia Pagoulatos, Planning Manager
2600 Fresno Street, Room 3065
Fresno, CA 93721
Sent by email: longrangeplanning@fresno.gov

RE: Greenfield Coalition Comments on 2025 Recirculated draft Program Environmental Impact Report for Southeast Development Area Plan (2025 SEDA Draft PEIR)

Dear Ms. Pagoulatos:

On behalf of the Greenfield Coalition, for which Regenerate California Innovation (RCI) acts as fiscal agent, we respectfully request the City incorporate the following comments and references regarding the Southeast Development Area Specific Plan and Recirculated draft Program Environmental Impact Report into the record of this matter, and provide substantive responses to these comments.

The Greenfield Coalition is a group of citizens and leaders in Fresno, California who are committed to preserving our city's agricultural land and green spaces, revitalizing our urban core, and advocating for responsible growth and urban planning. We envision a Fresno where all communities - new and historic - thrive with equitable investment, safe neighborhoods, vibrant schools and businesses, and sustainable infrastructure. Through research and advocacy, we strive to protect our existing communities and environment, and aim to create a resilient city that cherishes its heritage while embracing innovative solutions for sustainable growth.ⁱ

1. **This Greenfield Coalition comment letter fully incorporates the Public Comments on the 2025 Recirculated draft Program Environmental Impact Report for Southeast Development Area Plan (SEDA Draft PEIR) submitted on behalf of the Fresno Madera Tulare and Kings Counties Central Labor Council and Regenerate California Innovation (RCI), by Patience Milrod, Lawyer, submitted to the City of Fresno on March 24, 2025.**

2. We highlight comments and questions below that emerge from our review of the 2025 SEDA Draft PEIR, which are organized around the purpose statements of CEQA assessment as outlined by The Governor’s Office of Planning and Research.ⁱⁱ We generally find that the 2025 SEDA Draft PEIR is substantively and technically deficient and fails to adequately:

- a. Inform City of Fresno government decisionmakers and the public about the potential environmental effects of proposed SEDA project activities;
- b. Identify the ways that environmental damage by the SEDA project can be avoided or significantly reduced;
- c. Prevent significant, avoidable environmental damage by requiring changes in the SEDA project either by the adoption of alternatives or imposition of appropriate mitigation measures; and
- d. Disclose to the public ‘why’ the SEDA project should be approved with significant environmental impacts that cannot be mitigated to a less than significant level.

3. Failure of the 2025 SEDA Draft PEIR to adequately inform City of Fresno government decisionmakers and the public about the potential environmental effects of proposed SEDA project activities:

- a. The 2025 SEDA Draft PEIR incorporates out-of-date future population growth and housing demand estimates.ⁱⁱⁱ This results in misrepresentation and extreme overstatement of the demand for the SEDA project, and appropriately elevates the question of the factual need for the SEDA project to move forward at all. If the SEDA project is unnecessary from a future population and housing demand standpoint, how are the significant unavoidable environmental impacts produced by development of SEDA justified?
- b. The 2025 SEDA Draft PEIR fails to provide a timely SEDA buildout focused public facilities financing plan and a comprehensive fiscal impact analysis of the long-term and perpetual operating costs the City is obligated to bear for the full buildout of the SEDA plan area. These deficiencies must be corrected for there to be full public disclosure of the evaluation of all environmental and related plan impacts and to provide an adequate basis for prudent well-informed decision making by City of Fresno government officials. The lack of rigorous and comprehensive financial and fiscal analyses raises critical questions about the sustainability of City General Fund resources and the City’s fiscal solvency going forward. How can a City with pervasive and unmitigated cumulative urban decay, blight, and increasing negative environmental impacts, take on 9,000 acres of additional fiscal responsibility and adequately address huge existing public infrastructure and service deficits as well as meet future needs for public facilities, safety, other municipal services and

environmental quality?

4. Failure of the 2025 SEDA Draft PEIR to adequately identify the ways that environmental damage by the SEDA project can be avoided or significantly reduced:

- a. The 2025 SEDA Draft PEIR contributes to the real environmental damage the SEDA project could otherwise avoid, by incorporating false and unsupportable General Plan consistency analyses, violating standards for General Plan consistency. (PIER, Table 3.11-1: General Plan Consistency Analysis, Page 3.11-24). Contrary to consistency statements in the 2025 SEDA Draft PEIR, the SEDA plan detracts from and does not support a General Plan focus on infill development within the existing city limits, will not enhance existing residential neighborhoods through regulations, code enforcement, and compatible infill development, and will compete through SEDA planned land uses, design, and development intensities with demand for Downtown development and related investment.^{iv} Most of the General Plan consistency analysis provided in the 2025 SEDA Draft PEIR is not only substantively and technically deficient, it is speciously false, confusing the public and decision makers about potential negative environmental and other impacts of SEDA.
- b. The 2025 SEDA Draft PEIR does not disclose or mitigate the environmental impacts of directing billions of dollars into SEDA infrastructure, forcing scarce city resources away from existing neighborhoods, commercial districts and Downtown.

5. Failure of the 2025 SEDA Draft PEIR to adequately prevent significant, avoidable environmental damage by requiring changes in the SEDA project either by the adoption of alternatives or imposition of appropriate mitigation measures:

- a. The 2025 SEDA Draft PEIR inappropriately recommends a piecemeal and confusing approach for plan impact analysis and mitigation, resulting in substantively and technically deficient cumulative impact analyses. The 2025 SEDA Draft PEIR does not supply plan level analysis and mitigation, punting to case-by-case future development project application environmental reviews and mitigation, which prevents prevention of significant, avoidable environmental damage. The public and decision makers are clearly not provided with the adequate assessments of SEDA impacts required by CEQA.
- b. The 2025 SEDA Draft PEIR dismisses the need for evaluation of project alternatives (like an Infill Development Alternative and/or a West Area Neighborhood Specific Plan Alternative, for example), because of the scale of SEDA development proposed and its land use impacts. However, as noted above, the scale of SEDA plan is no longer justified by current relevant future

population growth and housing demand projections. As evaluated by the City of Fresno in a detailed parcel analysis in current Housing Element documents, existing city of Fresno infill housing development capacities can absorb multiples of realistic housing demand for the entire city for decades into the future.^v Also, the Recirculated Draft EIR for the West Area Neighborhoods Specific Plan released for public review and comment on March 12, 2025, indicates a capacity for total housing units well above what is errantly proposed by SEDA.^{vi} Not evaluating these types of plan/project alternatives through the 2025 SEDA Draft PEIR diminishes the efficacy and relevance of the CEQA assessment.

6. Failure of the 2025 SEDA Draft PEIR to adequately disclose to the public ‘why’ the SEDA project should be approved with significant environmental impacts that cannot be mitigated to a less than significant level:

- a. Restating again that the 2025 SEDA Draft PEIR fails to meet standards for public involvement by failing to provide timely circulation for public comment of a SEDA focused public facilities financing plan and a comprehensive fiscal impact analysis of the SEDA buildout on the sustainability of City General Funds and the City’s fiscal solvency going forward.
- b. If you combine the comments in our letter above, and all the detailed comments and references contained in the Public Comments on the 2025 Recirculated draft Program Environmental Impact Report for Southeast Development Area Plan (SEDA Draft PEIR) submitted on behalf of the Fresno Madera Tulare and Kings Counties Central Labor Council and Regenerate California Innovation (RCI), by Patience Milrod, Lawyer, submitted to the City of Fresno on March 24, 2025, it is apparent that the 2025 SEDA Draft PEIR fails to adequately disclose to the public why the SEDA project should be approved with significant environmental impacts that cannot be mitigated to a less than significant level.

7. In summary, the City of Fresno fails to provide a substantive and technically accurate CEQA assessment through the 2025 SEDA Draft PEIR that fully informs the public and decision makers as required; fails to provide a factual and believable ‘why’ the SEDA plan should move forward; and fails as a tool capable of providing a defense for legislative actions to approve and implement the Draft SEDA Specific Plan. Major critical and comprehensive analyses are missing and much work is still required to demonstrate evidence for conclusions and findings in the 2025 SEDA Draft PEIR. The Draft SEDA plan and EIR should be pulled from consideration in public hearings, and if not, denied by the Fresno City Council. In any event, a citywide and regional effort with extensive community and business involvement should be initiated by the City to comprehensively update the City of Fresno General Plan with the most contemporary factual data and relevant future population, economic and fiscal trend analyses.

8. **With respect to the vision and goals of the Greenfield Coalition – Elevating infill infrastructure, community revitalization, housing development, economic opportunity and health and well-being within the existing city limits is our priority. We see this happening through focused City efforts working alongside residents, businesses and developers. The action items below are being discussed by different local community groups and developers and merit consideration as effective tools to make infill development feasible and competitive at the scale needed in Fresno.**

- a. **By-Right Fast-Track Infill Housing** – 90-120 day streamlined entitlement, permitting and ministerial map approvals for 1 to 50 Units of Single Family (SF), Multiple-Family (MF), ADUs, and Junior ADUs related Infill Housing already allowed by existing zoning. **By-Right Fast-Track** process and timeline to include single coordinated system of all City departments and interagency partner sign-offs and approvals.
- b. **City Initiates Proactive Infill Infrastructure Development and Land Assembly** to support all possible/feasible infill housing units on parcels identified by Housing Element
- c. **Combine Affordable Infill Housing and Transportation Sales Tax Initiative** – Or create companion complementary sales tax initiatives
- d. **Maximize All Possible Financing District and Other Options** – including EIFDs, NIFTIs, Revolving Loan Funds, Housing Bonds, etc.
- e. **Leverage the Housing Element to Advance Tenant & Community Opportunity to Purchase Policies – TOPA-COPA^{vii}**

Respectfully submitted,

KR Bergthold

Keith Bergthold, CEO, Regenerate California Innovation, On behalf of the Greenfield Coalition – keith@regenerateca.org

ⁱ **Greenfield Coalition Website:** www.greenfieldcoalition.org

ⁱⁱ **THE GOVERNOR'S OFFICE OF PLANNING AND RESEARCH, CEQA 101:**

https://lci.ca.gov/ceqa/docs/20210809-CEQA_101.pdf

ⁱⁱⁱ **Milrod, 3-24-25 SEDA Comment Letter:** In December of 2024, the City paid First Carbon Solutions an additional \$153,636 to author a second Recirculated draft PEIR (see endnote 'iv' below); at that point, the accurate DOF and FCOG population data were readily available. In fact, when one now follows the link provided in the Recirculated PEIR at footnote 5 on page 3.14-2, one finds FCOG's October 2024 updated data <https://www.fresnocog.org/wp-content/uploads/2023/11/2024-Fresno-COG-2023-2060-Growth-Projections-REPORT.pdf>, which show a Fresno population in 2025 of 595,370 (not the PEIR's 621,540 - SEDA PEIR, at p. 3.14-2). FCOG's updated data report a 2050 Fresno City population of 646,260 (not the PEIR's 728,200). The accurate, FCOG, data show a Fresno City increase of 50,890 people between 2025 and 2050, not the almost 107,000 predicted in the PEIR. The accurate, FCOG, data yield only an additional 16,963 households

by 2050, well under half of the 35,553 households the PEIR's figures would project.

These errors in growth projections are fundamental: According to SEDA, its plans for 45,000 new housing units would comprise planned growth of only 31% percent of the total planned capacity for the City (PEIR, p. 3.14-13 – Section 3.14.4 - Project Impacts and Mitigation Measures). However, using accurate, FCOG, growth figures, it is clear that SEDA development would amount to almost *three times* (265%) the actual housing needs for all of Fresno City by 2050. Such a glut of new homes on the market, and the public investment necessary to launch it, would shatter the General Plan's goals for infill development and revitalization of Fresno City existing neighborhoods.

^{iv} **SEDA Recirculated Draft PEIR (2-7-25):** <https://files.ceqanet.opr.ca.gov/276421-4/attachment/E7xfuoY9aiwTd1F4Br6y2xPNwz9jb4qYaGAHTppQZrJ9eAd4pBW8DIVTfVOghVwTqrTF1qJYWqMyxIEI0>

^v **APPENDIX 1E: CITY OF FRESNO - Fresno Multi-Jurisdictional 2023-2031 Housing Element, December 2024:** https://www.fresno.gov/wp-content/uploads/2024/12/Appendix-1E_Fresno_December-2024-10w309.pdf

^{vi} **Recirculated Draft EIR for the West Area Neighborhoods Specific Plan:** <https://www.fresno.gov/planning/plans-projects-under-review/#west-area-neighborhoods-specific-plan>

^{vii} **TOPA-COPA:** <https://publicadvocates.org/wp-content/uploads/2022/04/topa-copa-policies.pdf>