

From: [REDACTED]
To: [Clerk](#)
Cc: [REDACTED]
Subject: BIAFM Public Comment on the "No Debt on Development" Charter Amendment (Proposed Charter § 1226) FINAL
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Attachments: [REDACTED]

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Please see attached public comment letter.

Darren Rose
Building Industry Association of Fresno and Madera Counties
[REDACTED]



July 29, 2026

Honorable Members of the City Council

City of Fresno
2600 Fresno Street
Fresno, CA 93721

VIA EMAIL

RE: Public Comment on the “No Debt on Development” Charter Amendment (Proposed Charter § 1226) — Policy Implications for Housing Affordability and Supply — November 3, 2026 Ballot

Dear Honorable Mayor and Members of the City Council:

The Building Industry Association of Fresno & Madera Counties (“BIAFM”) has represented the region’s residential homebuilding industry since 1947. As the Council considers the proposed “No Debt on Development” charter amendment, we write to share our industry’s technical perspective on how the measure would interact with the cost and supply of housing. Our purpose is to ensure the Council has a complete picture of the housing-market implications as it deliberates, drawing on the practical experience of the firms that finance and build homes in this region.

Something to consider is that from our perspective Council does not have a complete picture of SEDA. You have upcoming workshops and staff reports in the forthcoming weeks. By adding this now to the ballot without complete vetted information the law of unintended consequences may cause significant problems in the future.

The measure changes who bears the cost of new infrastructure. Infrastructure — water, sewer, streets, drainage, parks — is paid for one way or another. Because § 1226 would preclude the City from using General Fund revenues or its own bonding capacity for Southeast Development Area infrastructure, that cost would instead be recovered through the financing tools that attach directly to the home: development impact fees, Mello-Roos special taxes, and assessment liens. In practice, these costs appear in the purchase price of a home and in the

monthly obligations a buyer carries over time. The Council may wish to weigh this shift alongside the fiscal protections the measure is designed to provide.

The measure would restrict several established cost-reduction tools. Subsection b(1)(i) would limit tools the City has historically used to lower housing costs — impact-fee waivers and reductions, matching funds for state and federal housing and infrastructure grants, and interfund loans. One implication is that, within SEDA, the City’s ability to reduce the cost of attainable or affordable housing, or to capture grant funding that requires a local match, would be more constrained than in other parts of the City.

The measure has implications for housing production and timing. Growth areas typically depend on early “backbone” infrastructure — the first trunk line, the first arterial — that no single project can finance alone and that impact fees cannot fund until homes already exist. The seed funding and bonding tools the measure would restrict are commonly used to bridge that timing gap. To the extent those tools are unavailable, first-phase development in SEDA may be more difficult to finance and slower to deliver. This is a consideration of particular relevance given the region’s housing needs and the City’s Regional Housing Needs Allocation and Housing Element obligations.

The cost effects would fall unevenly across buyers and across the planning area. Special-tax and assessment costs tend to weigh most heavily on entry-level buyers, so the measure’s cost implications would be felt most by first-time buyers and working families. These costs should be considered regressive in their direct impacts. In addition, because the partial “South SEDA” carve-out exempts one area from the debt-financing restrictions, financeable capacity would be distributed unevenly within SEDA — a factor the Council may wish to consider in assessing the measure’s overall effect on supply.

Two technical matters may warrant the City Attorney’s review. First, whether a measure that foreseeably affects the cost and pace of housing across a major planning area raises considerations under state housing law, including SB 330 and the State’s affirmatively-furthering-fair-housing requirements. Second, the CEQA recital accompanying the resolution characterizes the measure as a “general tax,” a description that does not appear to match the measure’s operative provisions, which impose a spending and debt restriction rather than a tax.

BIAFM shares the Council’s interest in both responsible fiscal stewardship and a healthy housing supply. We offer these observations solely to inform the Council’s deliberation, and we would welcome the opportunity to serve as a technical resource on the housing-market and infrastructure-financing questions the measure raises. Thank you for your consideration.

Respectfully submitted,

Darren Rose

President & Chief Executive Officer

Building Industry Association of Fresno & Madera Counties