FRESNO CITY PLANNING COMMISSION
RESOLUTION NO. 13873

The Fresno City Planning Commission, at its meeting on December 4, 2024, adopted the following resolution relating to Plan Amendment Application No. P24-04066.

WHEREAS, California Planning and Zoning Law (California Government Code Section 65000, et seq.), requires the City of Fresno ("City") to adopt a comprehensive, long term general plan for the City's physical development and for any land outside City boundaries which bear relation to the City's planning;

WHEREAS, on December 18, 2014, by Resolution No. 2014-226, the City Council adopted the Fresno General Plan, and by Resolution No. 2014-225 certified Master Environmental Impact Report SCH No. 2012111015 (MEIR) which evaluated the potentially significant adverse environmental impacts of urban development within the City's designated urban boundary line and sphere of influence;

WHEREAS, California Government Code Sections 65580 – 65589.8 require adoption of a Housing Element as one of the seven required elements of the General Plan;

WHEREAS, the City adopted or amended previous Housing Elements in 1971, 1972, 1975, 1992, 2002, 2008, 2009, 2016, 2017, and 2019;

WHEREAS, the City of Fresno Planning and Development Director has filed Plan Amendment Application No. P24-04066 to amend the text of Chapter 11 of the Fresno General Plan, the Housing Element Chapter, by replacing the current Fresno Housing Element (2015-2023) with an updated Fresno Housing Element (2023-2031); and

WHEREAS, through adoption of Resolution 2022-079, the City entered into a Multi-Jurisdictional Housing Element Cost Sharing Arrangement with the Fresno Council of Governments (COG) on April 21, 2022 to hire a consultant to perform a coordinated update of the Housing Element for all participating jurisdictions;

WHEREAS, the planning consultant Placeworks was selected by the Fresno COG's Project Development Team to lead the Multi-Jurisdictional Housing Element project, with Ascent selected as a subconsultant assigned to the City of Fresno Housing Element; and

WHEREAS, the City's diligent effort at public participation was accomplished through collaboration with five community development corporations including Southwest Fresno Development Corporation, Lowell Community Development Corporation, Highway City Community Development Corporation, El Dorado Park Economic Development Corporation, and Hidalgo Community Development Corporation who partnered with City staff to convene stakeholders and hold workshops on the Housing Element; and

WHEREAS, 21 community workshops were held in the city from the fall of 2022 through

the summer of 2023 to gather input on the housing needs of Fresno residents; and

WHEREAS, the housing issues identified most frequently were lack of affordable housing, rental instability, and infrastructure needs; and

WHEREAS, in July 2023, after careful consideration of public comment, the first Public Draft of the Housing Element was released for further public review and comment;

WHEREAS, on November 3, 2023, the first Public Draft of the Housing Element was provided to the State Department of Housing and Community Development ("HCD") for a 90-day comment period; and

WHEREAS, in April and August of 2023, Council District Plan Implementation Committees 2, 3, 5 and 6 met and offered comments and suggestions, and the other Committees were not convened or did not meet due to lack of a quorum; and

WHEREAS Housing Element study sessions were held at Planning Commission and City Council on July 19 and 20, 2023; and

WHEREAS, on February 1, 2024, the City received HCD's comments, carefully considered each comment along with all public comment received, and issued a Revised Public Draft of the Housing Element in July of 2024;

WHEREAS, on October 7, 2024, the City received HCD's comments, carefully considered each comment along with all public comment received, and issued a series of Errata to the Revised Public Draft of the Housing Element (September 23, October 21, and November 12, 2024); and

WHEREAS, the City received a total of 43 comment letters from 30 commenters throughout the Housing Element process that were carefully considered; and

WHEREAS, all Housing Element drafts and errata to the Housing Element were posted on the City of Fresno and the Multi-Jurisdictional Housing Element websites for 7 days prior to sending to HCD pursuant to Government Code Section 65585(b)(1) and over 1,000 stakeholders were emailed notice of such postings; and

WHEREAS, paper copies of all Housing Element drafts and errata were placed at the public counter at City Hall, as well as the Central Library in downtown Fresno.

WHEREAS, the Fresno City Planning Commission conducted a public hearing at its regularly scheduled meeting on December 4, 2024 to review Plan Amendment Application No. P24-04066 and related Environmental Assessment, received public

testimony, and considered the Planning and Development Department's report regarding the applications; and

WHEREAS, no persons spoke in support and four spoke in opposition to the proposed applications.

NOW, THEREFORE, BE IT RESOLVED by the Planning Commission of the City of Fresno, based upon the testimony and information presented at the hearing and upon review and consideration of the environmental documentation provided, as follows:

1. The Commission finds in accordance with its own independent judgement that Environmental Assessment No. P24-04066 is appropriate, a finding that the project is exempt from the requirements of the California Environmental Quality Act (CEQA) Guidelines pursuant to the common sense exemption set forth in Section 15061(b)(3) of the guidelines because it can be seen with certainty that adoption of the Fresno Housing Element (2023-2031) has no possibility of causing a significant effect on the environment.
2. The Commission finds that the December 2024 Draft of the Fresno Housing Element (2023-2031), attached hereto as Exhibit A, has been prepared in accordance with the provisions of Government Code Sections 65580 – 65589.8.

BE IT FURTHER RESOLVED that the Fresno City Planning Commission hereby recommends approval to the City Council of Plan Amendment Application No. P24-04066 to amend the text of Chapter 11 of the Fresno General Plan, the Housing Element Chapter, by replacing the current Fresno Housing Element (2015-2023) with an updated Fresno Housing Element (2023-2031), as described and depicted in the attached Exhibit "A".

The foregoing Resolution was adopted by the Fresno City Planning Commission upon a motion by Chair Vang, seconded by Commissioner Shergill.

VOTING:
Ayes - Vang (Chair), Bray (Vice Chair), Criner, Diaz, and Shergill
Noes - None
Not Voting - None
Absent - Calandra and Lyday

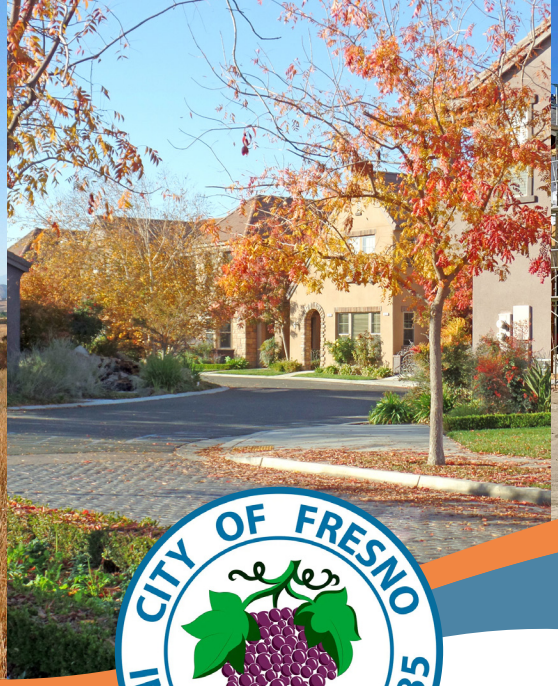
DATED: December 4, 2024

JENNIFER K. CLARK, Secretary
Fresno City Planning Commission

Resolution No. 13873
Plan Amendment Application No. P24-04066
Filed by the Planning and Development Department Director
Action: Recommend Approval to the City Council

Attachment: Exhibit A

Exhibit A
Fresno Housing Element, December 2024


APPENDIX 1E: CITY OF FRESNO

Fresno Multi-Jurisdictional 2023-2031 Housing Element

December 2024

A Regional Plan for Addressing Housing Needs

Fresno County • Coalinga • Firebaugh • Fowler • Fresno City • Huron • Kerman
Kingsburg • Mendota • Orange Cove • Parlier • Reedley • San Joaquin • Sanger • Selma

APPENDIX 1E: CITY OF FRESNO

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SECTION 1E-0: SUMMARY OF NEEDS AND CONDITIONS

Housing Needs Assessment

The following is a summary of major findings from the Housing Needs Assessment (Section 2) for the City of Fresno that informed the goals, policies, and programs of the updated Housing Element:

- The City's population increased by 1.2 percent on average between 2000 and 2022, which was lower than the countywide average annual growth rate of 2.0 percent. However, the number of households in Fresno increased by 0.7 percent between 2010 and 2020, a rate equal to the rate of growth countywide.
- The largest group of residents in Fresno by age were young adults (25 to 44 years, 29.3 percent of residents). A similar percentage were school-age students (5 to 17 years, 28.3 percent of residents), and a slightly smaller percentage were middle-aged adults (45 to 64 years, 20.3 percent of residents). The city's median age was 31.4 years. Typically, younger adult residents need multifamily options, homes with three or more-bedroom units, and ownership opportunities. A large proportion of school age students indicates that there may be a need for more affordable homes with adequate sizes for families. Younger adults and middle-aged adults, which make up the workforce, may need homes near employment or transit.
- Just over half of the residents of Fresno, 50.5 percent, identified as Hispanic or Latino of any race. This is slightly lower than the countywide rate of 53.4 percent of residents.
- The median household income in Fresno in 2020 was $53,568, slightly lower than the countywide median income of $57,109. In comparison, the California statewide median household income was $78,672 in 2022.
- In 2020, the most common industry for employment in Fresno was educational services, and health care and social assistance, with 25.3 percent of employed residents working in this field. In 2022, 4.6 percent of Fresno residents were unemployed.
- Over half of all households in Fresno (53.2 percent) were renters as of 2020. The rate of homeownership in Fresno was 46.8 percent, which was lower than the countywide average of 53.7 percent.
- Fresno's vacancy rate in 2022 was 3.8 percent across all housing units, regardless of tenure. This was a notable decrease from its 2010 vacancy rate of 7.6 percent.
- Between 2021 and 2022, the average sale price of a home in Fresno increased by 19.8 percent. Average sale prices rose 15.4 percent in the county as a whole during the same period. Lower-income households typically require assistance through City, County, State, or federal homebuyers' programs to purchase a home. For example, a down payment assistance loan program can help a household that can afford monthly mortgage payments and other housing-related costs but due to their limited income, has difficulty saving enough money for a down payment. In response to this need, the City has included **Program 19** to continue the Llaves de tu Casa Iniciativa, which provides home buyer assistance to Fresno residents, as well as promote the availability of Fresno County's Homebuyer Assistance Program.

- The age of a community's housing stock can provide a general indicator of overall housing conditions. In general, housing units over 30 years old are likely to exhibit signs of rehabilitation needs, such as new roofing, foundation work, and new plumbing. Over half of all housing units in Fresno (56.7 percent) were built more than 30 years ago, and 34.5 percent were built more than 50 years ago. Countywide, rates of housing stock in similar age brackets were 64.5 and 32.9 percent, respectively. If not already rehabilitated, these homes will likely need repair.
    - In response to this need, the City has included **Program 22**, which aims to connect lower-income households with rehabilitation resources during the planning period and complete a third of these in areas of concentrated poverty with older housing stock to facilitate place-based revitalization.
    - Additional resources to assist with home rehabilitation are listed in the Regional Multijurisdictional Housing Element in Section 4, Opportunities for Residential Development, in the subsection called Financial and Administrative Resources.
- Although trends of overpayment in the city of Fresno have decreased since 2010, Fresno still had a higher rate of households overpaying for housing than the county as a whole in 2018, with 41.3 percent of all households in the city overpaying for housing compared to 37.8 percent across the county. Similarly, the number of lower-income households overpaying for housing was higher in Fresno (74.8 percent in Fresno compared to 70.6 percent countywide). This shows a need for financial support, affordable units, and homeowner assistance programs. For example, a down payment assistance loan program can help a renter household achieve homeownership with a loan that enables them to afford monthly mortgage payments and other housing-related costs.
    - To address the overpayment of housing, the City will maintain adequate sites to meet the lower- and moderate-income RHNA throughout the entire planning period. The City has included **Program 2** to provide for a variety of housing opportunities in high resource areas, **Program 11** to provide incentives for housing development, and **Program 25** to reduce barriers to housing development.
    - Federal and state resources such as the Housing Choice Voucher (HCV) program, HOME Investment Partnership Act Funds, CalHOME, the California Housing Finance Agency, as well as local resources such as the First Time Homebuyer Assistance Program and Habitat for Humanity are available to provide financial assistance to renters and homeowners.
    - Additional resources to fund affordable housing activities are described in the Regional Multijurisdictional Housing Element in Section 4, Opportunities for Residential Development in the subsection called Financial and Administrative Resources.

- Fresno had a lower rate of large households, those with five or more members, compared to the county as a whole (16.9 percent of households in Fresno compared to 18.1 percent countywide). Large households may experience difficulty finding housing that is affordable and has more than three bedrooms; as a result, overcrowding may occur. According to estimates from the U.S. Census American Community Survey (ACS), of the 170,137 housing units in the city as of 2020, approximately 68,131 units have at least three bedrooms and an additional 29,738 units have more than four bedrooms. Among these larger units, 69.4 percent are owner occupied (67,935 units) and 30.6 percent are renter occupied (29,934 units). Based on this data, the City concludes that there is a sufficient availability of units suitable for large family households. However, large households would benefit from the additional development of affordable rental multi-family units with three or more bedrooms.
    - In response to these needs, the City is including **Program 24**, which seeks to apply additional funding sources for a variety of housing types for special needs groups, including large households.
- In 2020, the city had a similar rate of overcrowding (6.2 percent of households) compared to the county as a whole (6.1 percent of households). There was a higher rate of severe overcrowding in Fresno (4.6 percent of households) than in the county as a whole (3.6 percent). As shown in the Assessment of Fair Housing, overcrowding is more prevalent in Southwest Fresno, Downtown, and in central core neighborhoods of the city, which correspond with the racially concentrated areas of poverty.
    - To address overcrowding, the City will maintain adequate sites to meet the lower- and moderate-income RHNA throughout the entire planning period. The City has included **Program 2** to provide for a variety of housing opportunities in high resource areas, **Program 11** to provide incentives for housing development, and **Program 25** to reduce barriers to housing development.
- In 2020, the percentage of Fresno's population that was aged 65 or older was very similar to the percentage in the county as a whole (10.9 percent in Fresno compared to 12.0 percent of the county). Around two-thirds (66.1 percent) of Fresno's senior households were homeowner households. Of the total number of seniors living in the city, 44.5 percent had a disability. Households headed by someone 65 or older often experience a combination of factors that can make accessing or keeping affordable housing a challenge. Seniors and persons with disabilities are especially likely to live on fixed incomes and require accessibility modifications to homes to support mobility and independent living.
    - Resources including the Fresno/Madera Area Agency on Aging (FMAAA) provide seniors with connections to programs, services, and resources that defray the cost of living, which can be a lifeline for seniors with lower incomes. In addition, the Central California Food Bank includes senior hunger programs to assist those seniors with their nutritional needs.
    - In response to these needs, the City has included **Program 22** to provide exterior repair services to seniors and provides funds to non-profits for home rehabilitation programs for lower-income households. In addition, **Program 24** seeks to apply additional funding sources for a variety of housing types for special needs groups, including seniors.

- The percentage of Fresno households with single female heads of household was higher than the countywide rate (8.0 percent in the city compared to 7.3 percent in the county). Additionally, 36.1 percent of single-female-headed households in Fresno were living under the poverty level, which is higher than the rate in the county as a whole (34.0 percent countywide).
    - Key resources for this special-needs population include Centro La Familia, which provides support services to families and victims of domestic violence and sexual assault; California Rural Legal Assistance, which provides legal and housing counseling; Green Raiteros, which provides transportation, workforce development, and small business advancement; and Rural Mobile Health, which provides no-cost medical services. These services can be crucial for female-headed, single-parent households. In addition, the California Work Opportunity and Responsibility to Kids (CalWORKs) Program helps eligible needy families who have children under the age of 19 with cash assistance, Medi-Cal, and employment services.
    - In response to this need, the City has included **Program 24**, which seeks to apply additional funding sources for a variety of housing types for special needs groups, including single female heads of households.
- Due to proximity to services, Fresno had a higher rate of residents with disabilities than the county as a whole (13.8 percent compared to 12.9 percent across the county). Ambulatory difficulties were the most commonly reported disability.
    - Key resources for persons with disabilities include the Fair Housing Council of Central California and Resources for Independence Central Valley. Other resources such as Rural Mobile Health allows for medical services and screenings at no-cost.
    - In response to this need, the City has included **Program 24**, which seeks to apply additional funding sources for a variety of housing types for special needs groups, including those with disabilities.
- The 2023 Point-in-Time count estimated that 3,207 persons were experiencing homelessness in the city of Fresno at the time of the count. It is estimated that approximately 1,819 of those residents were unsheltered, representing a 7 percent increase in the unsheltered homeless population in Fresno.
    - Several services are available to homeless residents locally and in the region, including those provided by Catholic Social Services, Emergency Housing Center (Plaza Terrace), Evangel Home, Inc., United Way, Fresno Rescue Mission, and Marjaree Mason Center. A comprehensive list and description of resources is included in the Regional Multijurisdictional Housing Element in Section 2, Regional Housing Needs Assessment, in the subsection called Homeless.
    - To prevent displacement and homelessness in the City of Fresno, the City has included **Programs 32**, which allows for qualifying tenants and local non-profits the opportunity to purchase existing buildings to be used and/or maintained for affordable housing. **Program 33** protects mobile home park residents from excessive rent increases, while **Program 35** enforces the provision of replacement housing units. In addition, **Program 36** invests in various housing and emergency shelters to serve people experiencing homelessness, **Program 37** and preserves at-risk units from converting into market rate housing.

- Of the 58,762 year-round and seasonal farmworkers across the county in 2017, 37,819 workers (64.3 percent) worked 150 days or more each year and 35.7 percent worked less than 150 days per year. An estimated 4.3 percent of Fresno's employed population worked in agriculture, which is lower than the countywide rate (8.8 percent) and is the second-lowest rate of employment in agriculture in the county behind the City of Clovis. Looking at the U.S. Department of Agriculture (USDA) Census of Farmworkers data, the number of permanent farmworkers in Fresno County has decreased slightly from 2002 to 2017, decreasing from 18,751 to 16,876 farmworkers.
    - Farmworkers face unique challenges in securing affordable housing due to a combination of having limited English language skills, very low household incomes, and difficulty qualifying for rental units or home purchase loans. Farmworkers may face added affordable housing challenges due to their immigration status. Despite the decrease of farmworkers living in Fresno County on a permanent basis, farmworkers remain essential to Fresno County's economy as well as to local and national food supplies, and their need to have safe and affordable housing resources must be addressed.
    - A list of organizations that provide resources and support to Central Valley farmworkers is included in Section 1E-3: Fair Housing. Additional resources to assist farmworkers are listed in the Regional Multijurisdictional Housing Element in Table 2-45, Resources for Farmworkers.
- Through **Program 24**, the City will identify development opportunities for farmworker housing and meet with farmworker housing developers and advocates on a biannual basis to discuss their needs and offer assistance in the form of letters of recommendation for grant applications and discuss incentives for constructing farmworker housing. The City will also offer incentives such as density bonuses, streamlined processing, and the minor deviation process to facilitate development of farmworker housing.Extremely low-income residents (those earning 30 percent or less of median income) made up 15.5 percent of the total households in Fresno. Of those, 84.7 percent were renter households. This indicates a greater need for rental housing to support extremely low-income households. Extremely low-income households typically consist of minimum wage workers, seniors on fixed incomes, persons with disabilities, and farmworkers. Some extremely low-income households may also have large families or include household members with mental or other disabilities and special needs and require supportive services. This income group is disproportionately likely to live in overcrowded and substandard housing conditions. A total of 82.9 percent of extremely low-income households were overpaying for housing, a higher rate than low-income households (74.8 percent). Overall, 41.3 percent of households in Fresno are overpaying for housing. Given the significantly higher rates of overpayment among extremely low -income households, there is a great need for financial support and affordable units to meet the needs of this population. Without adequate assistance this group has a high risk of homelessness. Virtually all extremely low-income households are expected to need aid, including housing cost subsidies and social services.

- Key resources such as Section 8 rental assistance (i.e., Housing Choice Vouchers), the Central California Food Bank, Emergency Shelter Grant Program, Rural Development Loans and Grants, and Rental Rehabilitation Program can assist extremely low-income households with providing essential social services, prevent homelessness, and connect individuals with affordable housing. Additional resources to fund affordable housing activities are described in the Regional Multijurisdictional Housing Element in Section 4, Opportunities for Residential Development, in the subsection called Financial and Administrative Resources.
- While there are 26,300 extremely low-income households in the city, the total RHNA for both very low- and extremely low-income units for this Housing Element was 9,440. Therefore, there will still be an unmet need for housing extremely low-income households even if the City meets its quantified objectives for this Housing Element cycle. The City has included numerous programs to construct, rehabilitate, and conserve affordable housing for extremely low-, very low-, and low-income households. **Program 11** calls for the construction of 1,200 extremely low-income units to prevent displacement and provide housing mobility opportunities, while **Program 12** calls upon the City to establish a Local Housing Trust fund to develop 320 units for extremely low-, very low-, to low-income households. In addition, **Program 24** seeks to apply additional funding sources for a variety of housing types for special needs groups, **Program 20** seeks to increase availability of information and access to Section 8 rental assistance and units in resource-rich neighborhoods**, Program 22** seeks to connect lower-income households with resources for the rehabilitation and conservation of very low- and extremely low-income units, and **Program 36** calls upon the City to provide shelter, housing/rental assistance, and case management services for persons that are homeless, threatened with homelessness, or in need of housing assistance after completing a transitional living program.

SECTION 1E-1: ACTION PLAN

The intent of the Housing Element is to ensure that the City makes a meaningful effort and commits available resources to meeting the housing needs of all economic segments of the community. The Housing Element sets forth long-term goals and policies, as do other General Plan Elements, but also provides specific implementation programs to meet those needs, as specified in state law. The housing policies included in the City of Fresno's Housing Element, as well as the actions (implementation programs) that the City will undertake to meet its housing needs, are informed by extensive community input and recommendations from the following reports developed by the City of Fresno and other entities:

Published by City of Fresno

- **One Fresno Fiscal Year 2023–2025 Housing Strategy** – Published in 2022, this local housing strategy includes recommendations consolidated from over 3,000 residents via meetings and other reports that include input from public, community, nonprofit, philanthropic, and corporate representatives to facilitate more housing production and maintain affordability.
- **Analysis of Impediments to Fair Housing Choice and Annual Action Plan –** Every five years, the City carries out a planning process to identify the scope of housing and community development needs in its jurisdiction and to determine how available federal funding can best be used to meet those needs. As part of the plan, a community needs survey was deployed and received input from more than 500 individuals.
- **Downtown Neighborhoods Community Plan –** Adopted in 2016, this Community Plan is the result of an intense public process that involved input from over 300 residents, business owners, and property owners from Fresno's Downtown Neighborhoods in a series of public meetings and a six-day, open, participatory design workshop.

Published by Other Entities

- **Street2Home Framework to Action Report –** Prepared in 2018 by Barbara Poppe and Associates, the report outlines a strategic framework to end homelessness in the Fresno community. The process was guided by a steering committee and feedback sessions with community leaders and represents input from 36 agencies. It assesses Fresno's overall strengths and opportunities and offers recommendations on proven practices that have been shown to reduce homelessness in other communities.
- **DRIVE's Permanent Affordable Housing Plan –** Launched in 2019, the Fresno D.R.I.V.E. Initiative (Developing the Region's Inclusive and Vibrant Economy) is a 10-year Community Investment Plan drafted with input from a 300-person steering committee representing over 150 organizations in the Greater Fresno Region.
- **Evicted in Fresno: Facts for Housing Advocates** – Published in 2019, the study by Dr. Janine Nkosi, Dr. Amber Crowell, and Karla Arana of Central California Legal Services, Leadership Counsel for Justice and Accountability, and Faith in the Valley examines the degree of eviction rates and causes across the city of Fresno.

- **Here to Stay: A Policy-Based Blueprint for Displacement Avoidance in Fresno** – Published in 2021 by the Thrivance Group and funded by the California Strategic Growth Council as part of the Transformative Climate Communities work, the report represents input from more than 580 individuals who participated in City and partner-led workshops, surveys, and letter writings.
- **Financing Valley Infill: How to Boost Sustainable Development in the San Joaquin Valley** – Published in 2021 by the Council of Infill Builders, the report recommends options to boost infill housing in San Joaquin Valley downtowns and major transit corridors based on expertise of various state and local officials, architects, real estate investors, developers, and advocates.

GOALS AND POLICIES

The Multi-Jurisdictional Housing Element provides an opportunity for countywide housing issues and needs to be more effectively addressed at the regional level rather than just at the local level, and the 15 participating jurisdictions are committed to continuing the regional collaboration in the implementation of the Housing Element. By working together, the jurisdictions can share best practices, explore opportunities for further collaboration, and make the best use of limited resources.

The regional goals and policies that will be adopted by all participating jurisdictions are contained in Chapter 5: Housing Plan. These regional goals and policies are reiterated below and supplemented with local goals and policies specific to the City of Fresno to address the unique housing needs of the Fresno community.

1. New Housing Development

Regional Goal 1 **Facilitate and encourage the provision of a range of housing types to meet the diverse needs of residents.**

Regional Policies

Policy 1.1 Provide adequate sites for new housing development through appropriate planned land use designations, zoning, and development standards to accommodate the regional housing needs for the 2023-2031 planning period.

Policy 1.2 Facilitate development of new housing for all economic segments of the community, including extremely low, very low-, low-, moderate-, and above moderate-income households.

Policy 1.3 Continue to direct new growth to urban areas in order to protect natural resources.

Policy 1.4 Promote balanced and orderly growth to minimize unnecessary development costs adding to the cost of housing.

Policy 1.5 Encourage infill housing development on vacant, by-passed, and underutilized lots within existing developed areas where essential public infrastructure is available.

Policy 1.6 Promote development of higher-density housing, mixed-use, and transit-oriented development in areas located along major transportation corridors and transit routes and served by the necessary infrastructure.

Policy 1.7 Ensure the adequate provision of water, sewer, storm drainage, roads, public facilities, and other infrastructure necessary to serve new housing.

Policy 1.8 Approve new housing in accordance with design standards that will ensure the safety, quality, integrity, and attractiveness of each housing unit.

Policy 1.9 Encourage development around employment centers that provides the opportunity for local residents to live and work in the same community by balancing job opportunities with housing types.

2. Affordable Housing

Regional Goal 2 Encourage and facilitate the development of affordable housing.

Regional Policies

Policy 2.1 Support innovative public, private, and nonprofit efforts in the development of affordable housing, particularly for the special needs groups.

Policy 2.2 Continue to support the efforts of the Fresno Housing Authority in its administration of Housing Choice Vouchers certificates and vouchers, and the development of affordable housing throughout the County.

Policy 2.3 Encourage development of affordable housing through the use of development incentives, such as the Density Bonus Ordinance, fee waivers or deferrals, and expedited processing.

Policy 2.4 Provide technical and financial assistance, where feasible, to developers, nonprofit organizations, or other qualified private sector interests in the application and development of projects for federal and state financing.

Policy 2.5 Pursue grant funding to subsidize the development of affordable housing for low-, very low-, and extremely low- income households through new construction, acquisition, and/or rehabilitation.

Policy 2.6 Encourage the development of second dwelling units to provide additional affordable housing opportunities.

Policy 2.7 Work to ensure that local policies and standards do not act to constrain the production of affordable housing units.

Policy 2.8 Expand homeownership opportunities to lower- and moderate-income households through downpayment assistance and other homeownership programs.

Policy 2.9 Encourage sweat equity programs as a means for increasing homeownership opportunities for lower-income residents.

Local Policies

Policy 2.10 Require 55-year affordable housing covenants for all developments receiving public funds, including but not limited to CDBG, HOME, ESG, Housing Trust Fund, Land Trust Funding, Impact Fee Waivers, and General Fund Contributions.

Policy 2.11 Housing developments with at least 20 percent affordable lower-income housing units shall be permitted by-right (without discretionary action) at appropriate densities, consistent with objective development and design standards, on lower-income sites counted in previous housing element cycles, in compliance with Government Code Section 65583.2. This policy shall take effect upon adoption of the housing element and administrative procedures will be developed by March 31, 2025, as necessary.

3. Housing and Neighborhood Conservation

Regional Goal 3 Improve and maintain the quality of housing and residential neighborhoods in Fresno County.

Regional Policies

Policy 3.1 Preserve the character, scale, and quality of established residential neighborhoods by protecting them from the encroachment of incompatible or potentially disruptive land uses and/or activities.

Policy 3.2 Assist low- income homeowners and owners of affordable rental properties in maintaining and improving residential properties through a variety of housing rehabilitation assistance programs.

Policy 3.3 Continue code enforcement efforts to work with property owners to preserve the existing housing stock.

Policy 3.4 Provide for the removal of all unsafe, substandard dwellings that cannot be economically repaired.

Policy 3.5 Invest in public service facilities (streets, curb, gutter, drainage, and utilities) to encourage increased private market investment in declining or deteriorating neighborhoods.

Policy 3.6 Preserve assisted rental housing for long-term occupancy by low- and moderate-income households.

4. Special Needs Housing

Regional Goal 4 Provide a range of housing types and services to meet the needs of individuals and households with special needs.

Regional Policies

Policy 4.1 Encourage public and private entity involvement early and often through the design, construction, and rehabilitation of housing that incorporates facilities and services for households with special needs.

Policy 4.2 Assist in local and regional efforts to secure funding for development and maintenance of housing designed for special needs populations such as seniors and persons with disabilities.

Policy 4.3 Support the use of available federal, state, and local resources to provide and enhance housing opportunities for farm workers.

Policy 4.4 Encourage development of affordable housing units to accommodate large households (three and four bedroom).

Policy 4.5 Ensure equal access to housing by providing reasonable accommodation for individuals with disabilities.

Policy 4.6 Working in partnership with the other jurisdictions and the private/non-profit sectors in Fresno County, facilitate the provision of housing and services for persons experiencing homelessness and those at-risk of becoming homeless.

5. Fair and Equal Housing Opportunities

Regional Goal 5 **Promote housing opportunities for all residents regardless of age (over 40), race, religion, sex/gender, gender identity/expression, sexual orientation, marital status, ancestry, national origin, color, disability, genetic information, or military or veteran status.**

Regional Policies

Policy 5.1 Support the enforcement of fair housing laws prohibiting discrimination in lending practices and in the development, financing, sale, or rental of housing.

Policy 5.2 Ensure local ordinances and development regulations provide equal housing opportunity for persons with disabilities.

Local Policies

Policy 5.3 Amplify community voices among multi-lingual and other historically underrepresented populations by building capacity for community-based and neighborhood organizations to conduct outreach, public education, and community development activities.

Policy 5.4 Promote mixed income neighborhoods with an equitable distribution of housing types for people of all incomes throughout the city by encouraging new affordable housing in high resource areas.

Policy 5.5 Invest in historically underserved communities to transform racially and ethnically concentrated areas of poverty into areas of opportunity, while working to promote housing stability and provide new stable housing opportunities for current residents to stay and enjoy the neighborhood investments.

Policy 5.6 Encourage developers and contractors to support local labor through job fairs, training and apprenticeship programs.

6. Energy Conservation and Sustainable Development

Regional Goal 6 **Encourage energy efficiency in all new and existing housing.**

Regional Policies

Policy 6.1 Encourage the use of energy conserving techniques in the siting and design of new housing.

Policy 6.2 Actively implement and enforce all state energy conservation requirements for new residential construction.

Policy 6.3 Promote public awareness of the need for energy conservation.

7. Prevent Displacement and Homelessness

Local Goal 7 **Protect Fresno residents from displacement and prevent and reduce homelessness.**

Local Policies

Policy 7.1 Implement affordable housing preservation and renter protection strategies, especially in neighborhoods with racially concentrated areas of poverty and a high risk of renter vulnerability.

Policy 7.2 Protect residents from displacement and homelessness by preserving naturally occurring affordable housing and continuing to prohibit eviction without "just cause," enforcing the adopted limitations on rent increases, and promoting agencies and service providers offering foreclosure services.

Policy 7.3 Allow tenants and qualified non-profit organizations the right of first offer and/or the refusal to purchase eligible properties on the market to prevent tenant displacement and create long-term affordability.

Policy 7.4 Support the preservation of existing mobile home parks throughout the city as an important source of affordable housing.

Policy 7.5 Work to provide solutions that are consistent with "Housing First" principles in that stable housing is the first, critical step towards addressing human needs.

Policy 7.6 Support development of accessory dwelling units (ADU) and other innovative housing types for persons at-risk of or experiencing homelessness.

Policy 7.7 Increase capacity and sustainability of emergency shelter and service providers.

Policy 7.8 Facilitate acquisition and conversion of motels and hotels for use as emergency shelters or triage shelter transition and affordable housing conversion and support neighborhood-scale planning efforts to create complete community around the converted residences.

Policy 7.9 Ensure quality of independent living facilities meets standards developed by the Independent Living Association (ILA).

IMPLEMENTATION PROGRAMS

The City is committed to implementing the programs outlined below over the eight-year planning period. These implementation programs have been developed with community input and consideration for what the City could feasibly accomplish during the planning period with current staff resources. The implementation programs, which are organized by goal, are listed below:

Goal 1: New Housing Development

- Program 1– Maintain Adequate Sites
- Program 2 – Variety of Housing Opportunities in High Resource Areas
- Program 3 – Encourage and Facilitate Accessory Dwelling Units and Small Homes
- Program 4 – Streamline Development Review Process
- Program 5 – Large and Small Lot Development
- Program 6 – Objective Design Standards
- Program 7 – Adaptive Reuse
- Program 8 – List of Local Labor Unions and Apprenticeship Programs
- Program 9 – Use of Sites in Previous Housing Elements
- Program 10 – Annual Reporting Program

Goal 2: Affordable Housing

- Program 11 – Incentives for Housing Development
- Program 12 – Local Housing Trust Fund
- Program 13 – Pursue State and Federal Funding Sources for Housing Development
- Program 14 – Partnerships with Affordable Housing Developers
- Program 15 – Land Bank
- Program 16 – Community Land Trust
- Program 17 - Surplus Public Lands
- Program 18 - Mixed Income Neighborhood Trust (MINT)
- Program 19 – Home Buyer Assistance
- Program 20 – Housing Choice Voucher Incentive Program
- Program 21 – Advocate for Repeal of Article 34

Goal 3: Housing and Neighborhood Conservation

- Program 22 – Housing Rehabilitation
- Program 23 – Comprehensive Code Enforcement

Goal 4: Special Needs Housing

- Program 24 – Special Needs Housing
- Program 25 – Development Code Amendments for Compliance with State Law and to Reduce Barriers to Housing Development

Goal 5: Fair and Equal Housing Opportunities

- Program 26 – Fair Housing Services
- Program 27 – Environmental Justice
- Program 28 – Equitable Community Investments
- Program 29 – Equitable Engagement
- Program 30 – Workforce Development

Goal 6: Energy Conservation and Sustainable Development

- Program 31 – Reduce or Waive Fees for Vehicle Miles Traveled (VMT)

Goal 7: Prevent Displacement and Homelessness

- Program 32 – Opportunity to Purchase Act
- Program 33 – Mobile Home Parks
- Program 34 – Eviction Protection Program
- Program 35 – Replacement Units
- Program 36 – Homeless Assistance
- Program 37 – At-Risk Housing

Goal 1: New Housing Development

Program 1– Maintain Adequate Sites

The City shall continue to maintain a current inventory of Housing Element sites to ensure that it can adequately accommodate the 2023-2031 RHNA. The City shall continue to update the inventory on an ongoing basis as projects are approved and new sites are rezoned. To assist developers in identifying land suitable for residential development throughout the planning period, the City shall continue to make this information available to the public and developers online via the City's website.

The City shall work with applicants of pipeline projects counted in the Housing Element sites inventory to facilitate development. The City shall coordinate with applicants to expedite remaining entitlements and support funding applications, as appropriate. The City shall monitor the rent and sale prices of pipeline projects as they are built and adjust affordability assumptions in the inventory to reflect actual rents and sale prices. If the adjustment of affordability assumptions results in a deficit in capacity to meet the RHNA, the City will take action to identify capacity to meet a shortfall in accordance with "no-net-loss" zoning requirements in Government Code Section 65863. The City shall annually monitor the progress made on the pipeline projects counted in the inventory and if entitlements expire or projects are otherwise not anticipated to be completed in the planning period, the City shall remove them from the approved project list, reclassify them as vacant/non-vacant opportunity sites as appropriate unless conditions are found that will preclude development in the planning period, and recalculate the capacity on the sites according to the methodology used in the sites inventory chapter. If entitlements expire or projects are otherwise not anticipated to be completed in the planning period and conditions are found that preclude development on identified sites in the planning period, the City will evaluate whether adequate sites are maintained to accommodate the RHNA by income group. If determined that the City no longer has sufficient capacity to meet the RHNA, the City will take action to identify additional sites within 180 days, which may require rezoning another parcel to allow for increased density.

To ensure sufficient residential capacity is maintained to accommodate the RHNA need, the City shall make findings related to the potential impact on the City's ability to meet its unmet regional housing needs allocation when approving applications to rezone sites included in the lower- and moderate-income sites inventory or when approving applications to develop a lower- or moderate-income housing element site with fewer units or at a higher income than what is assumed for the site in the Housing Element sites inventory, consistent with "no-net-loss" zoning requirements in Government Code Section 65863. If at any point it is determined that the City does not have adequate capacity to meet the unmet lower- or moderate-income RHNA, the City shall identify and make available a replacement site within 180 days. The City shall prioritize finding replacement sites in high resource areas to affirmatively further fair housing goals. The City shall work with willing property owners to rezone sites and will conduct comprehensive outreach on the process prior to making any decisions.

Responsibility	Planning & Development Department
Funding Source	General Fund
Timeframe	Ongoing implementation. Update and assess status of housing sites inventory as projects are approved or as entitlement expire. Monitor the rent and sale prices of pipeline projects as they are built, adjust affordability assumptions in the inventory, and take action to meet shortfalls as needed. Monitor progress toward completion of pipeline projects and take appropriate action if entitlements expire or projects are otherwise not expected to be completed in the planning period.
Objective	Maintain adequate sites to meet the lower- and moderate-income RHNA throughout the entire planning period.

Program 2 – Variety of Housing Opportunities in High Resource Areas

Although the Housing Element demonstrates adequate capacity to meet the RHNA at all income levels, a larger portion of the lower-income housing sites are in areas considered low resource and concentrated areas of poverty compared to the above moderate-income housing sites. This is partially due to policies to encourage infill and higher density development in the Downtown Fresno and other centrally located neighborhoods with access to services and transit but is also reflective of the predominance of single-family zoning in new growth areas at the periphery. Many of these new growth areas, particularly in North Fresno, have higher median incomes, more positive educational outcomes, and rank higher on access to opportunity. To increase housing mobility opportunities for lower-income households and encourage racially and socially inclusive neighborhoods, the City shall expand opportunities for a variety of housing types in high resource neighborhoods that are currently dominated by single-family zoning. This includes the following actions:

- The City will present potential sites or rezoning options for land in high and relatively higher resource and income areas, including RCAAs, for Council consideration to provide opportunities for higher density development in all areas of the city and reduce concentrations of poverty. This shall include developing zoning standards to permit residential conversions in the Office Zone District, housing as a permitted use on parcels zoned Office, allow ministerial approval of office-to-residential conversions, and allow ministerial approval of housing near bus stops, including in RM zones and in zone districts that allow mixed-use. Additionally, the City will bring forward a text amendment to the development code that would increase allowable density and permitted uses (e.g., multifamily) in single-family districts within ¼ mile of a transit stop of any type. If the objective of 2,500 units cannot be met within the Office Zone District, the City will work with willing property owners to identify additional sites.

- The City will identify and pursue opportunities to promote the development of affordable and mixed-income housing in high and relatively higher resource and income, including RCAAs, areas through outreach to and engagement with affordable housing developers and by supporting the attainment of financing, such as CDBG, HOME Funds, tax credits, and state AHSC funds.
- The City shall develop zoning standards to encourage missing middle and multi-unit housing types in currently single-family dominated neighborhoods. Missing middle and multi-unit housing types include accessory dwelling units, duplexes, triplexes, fourplexes, townhomes, bungalow courts, courtyard apartments, live/work units, and SB 9 lot splits. The City shall review and amend the Development Code to incorporate objective standards to encourage these housing types in Residential Single-Family (RS) Districts. Zoning modifications may include but are not limited to increasing allowable heights and densities, reducing minimum lot sizes, and/or reducing open space and setback requirements to facilitate more diverse housing types. The City will develop objective design standards to ensure that new missing middle and multi-unit housing is compatible with the scale of existing residential neighborhoods.
- The City will incorporate Affirmatively Further Fair Housing analysis into decisions affecting funding and land use approvals for housing projects that require consideration by Planning Commission, City Council, or other boards and commissions as appropriate.

Responsibility	Planning & Development Department
Funding Source	General Fund
Timeframe	Create capacity for 500 units for high density multi-family development in high and relatively higher resource and income areas by the end of 2025, an additional 1,000 units by December 2027, and an additional 1,000 units by December 2031 Initiate review of zoning standards for missing middle housing in January 2025 and develop and adopt objective zoning and design standards by December 2025. Initiate a text amendment to the development code for a density bonus in single-family districts near transit by January 2026 for adoption by December 2026. Incorporate AFFH into land use and funding decisions beginning in January of 2025.
Objective	Create additional capacity for 2,500 multi-unit lower-income housing units in high and relatively higher resource and income areas. Support the development of 400 missing middle housing types (e.g., duplexes, triplexes, fourplexes, SB-9 lot splits) in RS zones during the planning period to increase the supply of affordable units throughout the city, thereby increasing access to resources and facilitating housing mobility opportunities for lower-income households and creating racially and socially inclusive neighborhoods.

Program 3 – Encourage and Facilitate Accessory Dwelling Units and Small Homes

The City will encourage the construction of accessory dwelling units (ADUs) and small homes (i.e., smaller than average primary residences) to bridge the gap between predominantly single-family neighborhoods with higher median incomes and multifamily neighborhoods. A primary objective of this program is to increase the supply of affordable units and small homes throughout the city, thereby increasing access to resources and facilitating housing mobility opportunities for lower-income households:

- Continue to provide pre-approved ADU and small home plans on the City website to facilitate lower costs and expedited reviews for applicants. Expand marketing of these pre-approved plans such that homeowners in all areas of the city are made aware of this opportunity.
- Encourage designers to create ADU 'standard plans' within the City's building plan review system to allow for fast-tracking of approval.
- Continue to implement the public education program advertising the opportunity for ADUs and small homes by updating informational handouts and brochures about ADUs and small homes that are available on the City's website and at the public counter annually, or as needed to reflect changes in state law. Publish informational materials pertaining to ADUs and small homes in multiple languages and through a combination of media, including the City's social media accounts and direct mailing. Promote public educational programs in all parts of the city.
- Provide informational materials on ADU and small home opportunities to all discretionary residential land use applicants.
- Develop partnerships with local builders and organizations such as California Tiny Homes, Pre-Fab Innovations, and Fresno City College's Construction Department to facilitate opportunities for ADU and small home development, workforce development, and innovative strategies to construct units for landlords that make ADUs and small homes affordable housing for low- or very low-income households.
- Promote inclusion of ADUs as multi-generational housing in new development.
- Continue to work with partner agencies and funding entities to remove barriers to ADU development.
- Subsidize inspections fees for landlords that make ADUs as affordable housing for low- or very low-income households.
- Explore a subsidy for utility hook-ups such as water, sewer, and electricity for landlords that make ADUs affordable housing for low- or very low-income households.
- Encourage the use of the City's free ADU and small home standard plans for farmworker dwelling units and cottage communities.
- Continue to provide ADU and small home resources on the City website, hotline, and email to answer questions on the program.

- Monitor the production and affordability of ADUs every two years and the progress made according to the assumptions in the inventory. Take alternative actions (e.g., additional incentives) within six months of finding if not meeting the assumptions in the sites inventory.

Responsibility	Planning & Development Department
Funding Source	General Fund or Grant Funds
Timeframe	Update ADU and small home materials annually, or as needed to reflect changes in state law and identify incentives for construction by December 2024. Report ADU production and affordability levels in the annual progress report. Every two years, determine if on track to meet sites inventory assumptions. If not, adjust assumptions or take action within six months of finding. Update City pre-approved ADU and small home plans with Residential Building Code update cycle every three years starting in 2026. Promote City pre-approved ADU and small home plans through public engagement activities in all areas of the city assessing outcomes of outreach annually beginning in 2025. Subsidize inspection fees for landlords that make ADUs affordable for low- and very low-income households starting in July 2025. Explore subsidies for utility hook-ups for landlords that make ADUs affordable by December 2025. In coordination with the Fresno County Farm Bureau, the City will advertise the ADU and small home standard plans to farmworkers and farm owners by 2026. Identify barriers to development of ADUs by July 2025 and work to reduce barriers by January 2026.
Objective	Facilitate development of 50 ADUs or small homes for lower-income households (including extremely low-, very low-, and low-income), 24 ADUs for moderate-income households, and 20 ADUs for above moderate-income households to improve housing mobility opportunities and reduce displacement risk, with 30 percent of development for lower- and moderate-income households in relatively higher resource and income areas including RCAAs.

Program 4 – Streamline Development Review Process

The City will develop a preliminary application form and procedure or will adopt the Preliminary Application Form developed by HCD, pursuant to SB 330. The City will also establish a written policy and/or procedure, and other guidance as appropriate, to specify the SB 35 streamlining approval process and standards for eligible projects under Government Code Section 65913.4. The applications and guidance documents will be available on the City's website for developers interested in pursuing the streamlined process or vesting rights.

The City shall conduct a review of local entitlement and permit processing procedures and identify ways to further streamline the development review process, including establishing a non-discretionary process to approve housing for qualifying developments based on size, type, affordability level, and location. The City will also amend the Development Code to remove appeal provisions for Development Permits or convert certain housing application types to ministerial if the project is consistent with the objective General Plan, zoning, subdivision, and design standards and criteria. Finally, the City will continue its commitment to providing navigation and concierge services to assist applicants with entitlement and permit processing for affordable housing projects.

Responsibility	Planning & Development Department, with support from other development services departments
Funding Source	General Fund
Timeframe	Develop an SB 330 preliminary application form and SB 35 streamlined approval process by July 2025. Review local entitlement and permitting procedures by December 2025 and make further modifications within 6 months to streamline development of housing throughout the city.
Objective	Shorten average entitlement processing times

Program 5 – Large and Small Lot Development

Small sites present the opportunity for development on existing sites or lot consolidation into larger projects. There are many opportunities for lot consolidation surrounding identified sites, given the underutilized nature of surrounding properties. The Voluntary Parcel Merger program, in effect since 2016, permits the combining of parcels without going through the Parcel Map or Lot Line Adjustment process. The City adopted a reduced application fee, currently (2023) $696.

The Sites Inventory includes vacant and underutilized lower-income sites that are over 10 acres in size. To encourage a strategic approach to the development of large sites and to facilitate the development of housing, the City will encourage the development of large sites through an allowance of phasing of development and off-site improvements as allowed pursuant to Section 66456.1 of the Subdivision Map Act, and, where applicable, through a Master Plan. In addition, the City will provide incentives for the development of large sites with a variety of housing types, including affordable housing, such as site planning and design, including preliminary feasibility analysis, and providing funding through the annual Notice of Funding Availability (NOFA). The City will provide the site planning and feasibility analysis and partner with the property owners to market the large sites to the developers, including developers of affordable housing.

The City will routinely coordinate with interested developers/property owners in identifying opportunities for lot consolidation or lot splitting. The City will continue to streamline the processing of requests for lot consolidation and lot splitting concurrent with other development reviews, and subdivision maps that include affordable housing units. Currently, the City utilizes tools such as ministerial processing and other streamlining tools, as appropriate, to facilitate lot merging and parcelization. Additionally, the City will consider incentives for development of low-income high-density residential on large sites, such as concessions to development standards beyond state density bonus law, assistance with on and off-site improvement, parking reductions, funding, and fee deferrals or reductions. The City will conduct a biennial review of the development on large and small lots, and seek input from developers and property owners on the regulatory barriers to lower-income residential development of these lots.

Responsibility	Planning & Development Department
Funding Source	General Fund
Timeframe	Continue to implement the Voluntary Parcel Merger Program and fee reduction program. Conduct a biennial review of development on large and small lots, include an annual review process for monitoring the percentage of affordable units developed on large lots. As projects are processed throughout the planning period, make changes as appropriate based on review and input. Review and establish incentives by Winter 2026. Provide site planning and feasibility analysis on at least one large site every two years during the housing element period, i.e., 2025, 2027, 2029, and 2031 Issue NOFA annually to provide funding for affordable housing.
Objective	Facilitate development of 600 lower-income units on large and small lots to promote the efficient use of land for residential development, with 30 percent of development in relatively higher resource and income areas including RCAAs.

Program 6 – Objective Design Standards

The City will review and amend site development standards and façade design standards in the Development Code for residential and mixed use zones to ensure standards are clear and objective.

Responsibility	Planning & Development Department
Funding Source	General Fund
Timeframe	Initiate review of zoning standards for site development and façade design in January 2025 and develop and adopt objective zoning and design standards by December 2025.
Objective	Accelerate housing production by ensuring development standards are clear and objective

Program 7 – Adaptive Reuse

The City shall encourage adaptive reuse of commercial and office buildings to housing. The City shall evaluate, and if appropriate, amend the Development Code to remove potential constraints for adaptive reuse, including review or approval processes. The City shall consider regulatory incentives or waivers related to parking, open space, trash, and landscaping requirements and standards.

Responsibility	Planning & Development Department
Funding Source	General Fund
Timeframe	Evaluate whether review or approval processes and development standards are a constraint on adaptive reuse or interim reuse. If barriers to adaptive reuse or interim use are identified, modify processes and/or adopt incentives as appropriate. Establish regulatory modifications no later than 2026. Evaluate the California Building Code to determine if there are alternate means and methods which if applied could reduce the construction costs related to adaptive reuse. Evaluate with the next Ca BC cycle effective January 2026.
Objective	Facilitate adaptive reuse of existing buildings into housing to increase the city's housing supply.

Program 8 – List of Local Labor Unions and Apprenticeship Programs

Provide a list of local labor unions and apprenticeship programs to developers, contractors, and community members to use and to encourage developers and contractors to hire local labor.

Responsibility	Planning & Development Department
Funding Source	General Fund
Timeframe	By December 2024, the City will provide the list on the City's website and update annually thereafter or upon request from local unions to be added to the list.
Objective	To encourage developers and contractors to hire local labor.

Program 9 – Use of Sites in Previous Housing Elements

Pursuant to Government Code Section 65583.2(c), any vacant sites included in the prior two Housing Elements (4th and 5th Cycle RHNA planning periods) and any non-vacant sites included in at least one prior Housing Element shall be provided by-right development when at least 20 percent of the units in the proposed development are affordable to lower-income households. This means that the City cannot require any form of discretionary review or approval for such projects. The City will develop an SB 330 preliminary application and SB 35 streamline approval process.

The City will implement a text amendment to the Development Code to permit developments with at least 20 percent affordable lower-income units without appeal on any vacant and non-vacant sites identified in the lower-income inventory of the 5th Cycle Housing Element. A proposed project would also not be subject to CEQA and would not be appealable. See Policy 2.11.

Responsibility	Planning & Development Department
Funding Source	General Fund
Timeframe	Develop and implement text amendment to Development Code by May 2025 Develop SB 330 preliminary application and SB 35 streamline approval process in 2025.
Objective	Streamline development on vacant and non-vacant sites identified in previous Housing Element planning periods.

Program 10 – Annual Reporting Program

The City shall actively work toward Housing Element implementation, and reach out to the community including housing advocates, organizations, and developers annually to assess progress as part of a Housing Element Annual Report. The City shall provide multiple avenues for residents and stakeholders to provide input on the implementation of the Housing Element and submit feedback to staff. Every year, the City shall invite interested community members to discuss housing production progress at an annual public hearing. The City will provide annual information to the community on housing density and affordable housing and will develop a metric on displacement to include in the Annual Progress Report. The City will seek input on the effectiveness of housing and fair housing-related programs and policies maintained by the City. The City shall utilize multiple methods of outreach to engage all members of the Fresno community, including multilingual notices and media outlets. The City shall track and report on the location of new housing development, including affordability levels and geographic distribution in relation to areas of affluence and poverty (i.e., RE/CAPs and RCAAs). The City will consider establishing a Housing Element Public Engagement Committee that meets semiannually to garner feedback on housing conditions and housing element implementation.

Responsibility	Planning & Development Department
Funding Source	General Fund
Timeframe	Conduct public outreach on a draft Housing Element Annual Progress Report prior to the annual public hearing. Hold public hearing prior to submittal to HCD.
Objective	Engage a broad spectrum of the community ongoing, and often, on the progress and effectiveness of Housing Element implementation, and make changes as appropriate based on review and input.

Goal 2: Affordable Housing

Program 11 – Incentives for Housing Development

The City will continue to work with housing developers to expand affordable housing opportunities by doing the following:

- Work with developers of multifamily and affordable housing projects to identify site opportunities in high and relatively higher resource and income areas, including RCAAs, to reduce concentrations of poverty, improve access to resources for lower-income residents, and promote racially and socially inclusive neighborhoods.
- Continue to provide priority processing for the construction of new housing in the Downtown Planning Area by processing completed plans, consistent rezoning, and Development Permit review and Conditional Use Permit applications for permitting within an average of 75 working days.

- Continue to provide reduced application fees and priority processing for single-family and multi-family projects within the Inner City Fee Program area, as referenced in the Municipal Code, to create housing units in infill areas.
- Continue to offer impact fee waivers for qualifying infill projects in priority areas of the city pursuant to Ordinances 2013-21 (The Build Act), and Fresno Municipal Code Article 4.14 (Fee Waivers for Certain Projects in Economically Disadvantaged Areas).
- Provide flexibility in meeting off-site infrastructure requirements for affordable housing projects.
- Encourage developers to use the State Affordable Housing Density Bonus and City of Fresno Transit-Oriented Development (TOD) Height and Density Bonus provisions through technical assistance and information dissemination.
- Consider and establish additional incentives for the provision of affordable housing.
- Incorporate the location of affordable housing in high and relatively higher resource and income areas, including RCAAs, as an additional priority that would qualify for incentives.
- Post and maintain a list of incentives available to developers, including density bonus and impact fee waivers, on the City's website.

Responsibility	Planning & Development Department
Funding Source	General Fund
Timeframe	Provide ongoing assistance and incentives to support development during the 2023-2031 planning period. Establish and post the list of available incentives on the City's website by December 2026. Update the list, as needed.
Objective	Provide incentives for 1,200 extremely low-income, 1,750 very low-income, and 1,500 low-income units, at least 40 percent of which are in moderate, high, or highest resource areas to facilitate housing mobility for lower-income households and special-needs groups.

Program 12 – Local Housing Trust Fund

In 2021, the City established a Local Housing Trust Fund (LHTF) to address the need for decent, safe, and affordable housing within the city. The City shall leverage the LHTF to direct funds toward eligible projects that are informed by a community input process. In 2022, the City was awarded a State of California Local Housing Trust Fund matching grant to support projects involving new construction of affordable rental housing for lower-income households [i.e., households earning below 60 percent of the Area Median Income (AMI)]. The City shall publish a Notice of Funding Availability (NOFA) to solicit applications for the distribution of funding from the LHTF as funds are available.

The City shall review and update the current list of priorities for use of the funds through a community-driven process at least once during the Housing Element planning period.

Responsibility	Planning & Development Department
Funding Source	Local Real Estate Transfer Tax, General Fund, and State of California Local Housing Trust Fund Program.
Timeframe	Annually publish a NOFA to solicit applications for funding. Review and update community priorities for the distribution by July 2028.
Objective	Utilize LHTF to leverage up to $24 million of additional investment in affordable housing development during the planning period to support 320 extremely low-, very low-, or low-income housing units, with 30 percent of development in relatively higher resource and income areas including RCAAs.

Program 13 – Pursue State and Federal Funding Sources for Housing Development

The City will actively pursue funding to assist in the development, preservation, and rehabilitation of housing with a particular emphasis on the development of mixed-income neighborhoods. The City will identify these funding opportunities to both for-profit and non-profit developers by deploying multiple rounds of funding availability notices. The City will also continue to provide technical assistance regarding state and federal financing and grant applications including but not limited to Low-Income Housing Tax Credit (LIHTC) and Affordable Housing and Sustainable Communities (AHSC) applications. The actions that the City will take specifically include, but are not necessarily limited to:

- Identifying potential funding assistance and support applications for current state and federal assistance.
- Identifying sites available for development and infill opportunities.
- Pursuing funding to assist in the development, preservation, and rehabilitation of housing, with a particular emphasis on the development of mixed-income residential neighborhoods and the expansion of affordable housing opportunities outside of the city's low- and moderate-income areas.
- Partnering with non-profit entities to acquire properties for rehabilitation and/or development of affordable and mixed-income housing.
- Supporting state and federal legislation that increases financial support for affordable housing.
- Strive to maintain Prohousing Designation status to increase competitiveness for state funding opportunities.
- Assessment and exploration of the potential for new funding programs to create additional local sources of funding for affordable housing.

Responsibility	Planning & Development Department, nonprofit and for profit developers
Funding Source	CDBG, HOME, LIHTC, AHSC, PLHA
Timeframe	Annual assessment of funding opportunities and status of housing sites inventory as part of the annual reporting process; Ongoing implementation and annual reporting throughout the planning period.
Objective	Pursue $15 million in funding annually to assist in the development, preservation, and rehabilitation of affordable housing, with 30 percent of investment targeting relatively higher resource and income areas including RCAAs.

Program 14 – Partnerships with Affordable Housing Developers

The City will continue to strengthen partnerships and relationships with affordable housing developers by doing the following:

- Identifying site opportunities for affordable housing in higher-resource areas and areas with higher median incomes to reduce concentrations of poverty and improve access to resources.
- Encouraging and assisting in funding applications to applicable federal, state, and local funding sources.
- Working with affordable housing developers to structure annual funding commitments to support multiple rounds of tax credit applications.
- Identifying opportunities to align entitlement and permit approvals for affordable housing projects with funding deadlines e.g., HOME), including post-entitlement processes like encroachment permits.
- Supporting local capacity building efforts around affordable housing finance, including convening affordable housing developers, community development leaders, lenders, advocates, lower-income and special needs households, and households and individuals in protected classes to identify housing needs as well as ongoing regulatory and funding barriers to affordable and mixed-income development.
- Attracting large investors to facilitate the construction of new affordable housing units
- Assisting nonprofits who develop self-help type single-family housing construction for extremely low-income households.
- Joint advocacy for CEQA streamlining of single-unit affordable housing.
- Supporting training programs for small-scale affordable housing developers.
- Publishing notices for funding availability for various City housing programs, projects, and activities.

- Administering Community Housing Development Organization (CHDO) funds for affordable housing projects with certified CHDOs.
- Encouraging non-profit organizations to seek funding for development of new farmworker housing projects, as well as local affordable housing and mixed-income projects in transit-oriented developments along transit corridors throughout the city.
- Pursue partnerships with developers and businesses which build and produce affordable pre-fabricated housing to facilitate the increased production of these cost efficient alternative housing types.

Responsibility	Planning & Development Department
Funding Source	HOME & CDBG Programs, PLHA, LHTF
Timeframe	Ongoing implementation and annual reporting throughout the planning period; annual review and assessment of potential funding opportunities; convene annual meetings with housing stakeholders starting in January 2025. Identify opportunity sites for affordable housing including in high resource areas by 2027.
Objective	Partner with affordable housing developers and stakeholders to facilitate the development of 1,200 extremely low-income, 1,750 very low-income, and 1,500 low-income units, at least 40 percent of which are in high or highest resource areas to facilitate housing mobility for lower-income households and special-needs groups.

Program 15 – Land Bank

The City shall research viable land banking models with the goal of establishing a local land bank that could acquire parcels of land for the development of affordable housing. Once established, the City shall identify and maintain an inventory of underutilized land and vacant properties and work to acquire properties and remove blight while returning them to productive use.

Responsibility	Planning & Development Department
Funding Source	General Fund; ARPA
Timeframe	Research viable land banking models with the goal of establishing a local land bank by 2029.
Objective	Accumulate underutilized land and/or vacant properties that could be used to support construction of affordable housing.

Program 16 – Community Land Trust

The City shall support the establishment of local Community Land Trusts to acquire and/or build affordable housing that remains so in perpetuity within the city of Fresno. The City shall support the Community Land Trusts in acquiring affordable housing units in areas at risk of displacement and acquiring land in high resource areas for the construction of new affordable housing, as well as collaborating to maintain vacant sites once acquired. Additionally, the City will provide support to land trusts for staff, stakeholder and community education on the land trust model.

Responsibility	Planning & Development Department with support from Code Enforcement, Public Works
Funding Source	General Fund; ARPA
Timeframe	By 2027, identify opportunity sites in areas at risk of displacement and in high resource areas and provide to the local Community Land Trusts for their consideration.
Objective	Build capacity of local Community Land Trusts to acquire and/or build affordable housing that remains so in perpetuity within the city, with 30 percent of land acquisitions and new construction targeting relatively higher resource and income areas including RCAAs.

Program 17 - Surplus Public Lands

The City will continue to release land designated as surplus for development of affordable housing and other uses consistent with the California Surplus Lands Act (SLA). The City will continue to release sites as available for affordable housing development projects. All surplus sites disposed of pursuant to the SLA will include a minimum of 15 percent affordable units and in many cases will include up to 100 percent affordable units. Current City policy directs that property sale receipts are to be credited to originating funding sources utilized for purchase of property. The City will consider depositing a portion up to 100 percent of net proceeds from such sales or leases to the Local Housing Trust Fund.

Prior to disposition under the SLA, the City will identify opportunities to use surplus sites – as well as other City-owned or City-leased properties – for emergency housing programs and other community-serving uses.

Several City-owned sites are included in the Housing Element sites inventory, but others are not included because they are not currently zoned for residential. Some of the included sites are currently zoned for lower-density single-family development. The City will review all City-owned sites by June 2025 to determine appropriateness for affordable housing and identify if a zone change would be needed to facilitate affordable housing. If zoning amendments are needed, the City will complete rezoning of the sites within one year (June 2026). Some of the sites owned by the City and Successor Agency are small lots within existing neighborhoods that might be appropriate sites for missing middle or affordable homeownership opportunities for lower-income households. The City will review the list of publicly-owned sites and work with the Successor Agency and local non-profits and other organizations to develop a strategy for facilitating affordable housing on small, scattered sites.

Responsibility	Planning & Development Department
Funding Source	General Fund
Timeframe	Complete a list of potential City surplus sites by June 2025. Develop list of small publicly-owned sites by December 2025 and coordinate with the Successor Agency and local organizations to develop a strategy for facilitating missing middle and affordable housing opportunities on these sites by December 2027. Develop disposition and disposal strategy in 2026. Initiate rezoning of City-owned sites in 2026 and complete rezoning in 2027. Publish a Notice of Availability for at least 15 percent of City surplus sites annually and complete disposition within one year of publication. Complete entitlements and issue building permits within one year of disposition. Evaluate progress in 2029 toward achieving the objective and if necessary to maintain adequate sites to accommodate the RHNA, identify and/or rezone additional sites by 2030.
Objective	Based on marketability and demand, release sites when available for affordable housing development projects. Facilitate development of 2,000 units, including 1,250 lower-income units.

Program 18 - Mixed Income Neighborhood Trust (MINT)

The City shall partner with and build capacity of the Central Fresno Neighborhood Trust (CFNT), a Mixed Income Neighborhood Trust (MINT) model, which has been identified as a tool for accelerating the development of affordable rental housing. Established in 2023, CFNT will develop, own, and manage a scattered site income-restricted rental portfolio, governed by community stakeholders, and legally mandated to preserve affordability and belonging for today's renters. The CFNT and Central California Land Trust would complement one another in purpose.

Responsibility	Planning & Development Department and CFNT
Funding Source	General Fund; ARPA
Timeframe	Complete initial contract by end of 2026
Objective	Support CFNT to develop a scattered site rental portfolio of a minimum of 50 new affordable rental housing units.

Program 19 – Home Buyer Assistance

In order to expand housing opportunities across Fresno, the City will commit to offering financial and technical assistance, as well as encourage counseling services to assist low-income residents in purchasing a home. The City will continue to pursue state and federal funds annually to support local first-time homebuyer programs to assist low-income first-time homebuyers to purchase a home in the city of Fresno. The City shall also maintain a partnership with NAHREP (National Association of Hispanic Real Estate Professionals) Fresno, Federal Home Loan Bank (FHLBank) of San Francisco's WISH Program, Self-Help Enterprises, and Union Bank to administer the Llaves de tu Casa Iniciativa to provide down payment and closing cost assistance, home buyer grants, comprehensive home buyer education and counseling including first-time home buyer workshops and flexible mortgage products and programs available to all residents, with a focus on increasing Latino homeownership rates.

The City's Housing and Community Development Division will offer the following support and assistance in the variety of languages representative of Fresno including, but not limited to, Spanish, Hmong, and Punjabi:

- **Technical assistance** - Guide applicants through the application process, offer technical support throughout the length of the program
- **Financial assistance** - Offer up to $100,000 in loans, cover down payments and closing costs, zero interest fees, loan fees, or monthly payment fees, loan forgiveness after 15 years, and flexible payment plans calculated according to income at the time of application and adjusted based on changes in grantees income. Applicants will be required to participate in financial counseling services for support in becoming strong financial candidates, adapting to the challenges of becoming homeowners, and increase the beneficial impact of the program.
- **Financial counseling services** - Intended to increase the beneficial impact of the program by preparing applicants to become strong financial candidates and offer support as grantees to help them adapt to the financial challenges of becoming homeowners.

The City will promote all available homebuyer resources on the City's website, at public counters, viand through City media outlets, community outreach, informative workshops, partnerships with local media outlets, neighborhood/homeowners' associations, realtors' associations, homebuilders, lenders, Rotary, and Community Based Organizations. Targeted outreach and promotional efforts will occur in R/ECAP and extremely low and very low-income households, prioritizing individuals and households with special needs.

Responsibility	Planning & Development Department and nonprofit community development corporations
Funding Source	Permanent Local Housing Allocation (PLHA), NAHREP (National Association of Hispanic Real Estate Professionals) Fresno, Federal Home Loan Bank (FHLBank) of San Francisco, Self-Help Enterprises, and Union Bank

Timeframe	Apply annually for state funding to support local first-time homebuyer programs starting in 2024, including the state's CalHome Program and the Jose Serna, Jr. Farmworker Housing Grant, as funding is available. Beginning June 2025, provide quarterly reports describing how many applicants were assisted, and a description of outreach efforts and the location of where grantees were able to find housing. Beginning January 2025, the City will host two informative workshops every quarter and emphasize accessibility to extremely low-income and very low-income residents. Beginning in January 2025, develop and implement a strong community outreach program to notify residents of the availability of the program targeting extremely low-income and very low-income residents. Marketing and outreach shall occur on an ongoing basis and updated at least annually from receipt of funds. Beginning January 2025 or within 4 months of receipt of funds, the City will begin accepting applications for the program. Review City website annually.
Objective	If the City receives PLHA or other homeownership funding, the City will strive to support a total of 40 low- and moderate-income households with home purchases during the planning period, with 30 percent of purchases targeting relatively higher resource and income areas including RCAAs.

Program 20 – Housing Choice Voucher Incentive Program

The Housing Choice Voucher (HCV) program is the federal government's major program for assisting very low-income families, the elderly, and the disabled to afford decent, safe, and sanitary housing in the private market. Since housing assistance is provided on behalf of the family or individual, participants are able to find their own housing, including single-family homes, townhouses and apartments.

The participant is free to choose any housing that meets the requirements of the program and is not limited to units located in subsidized housing projects.

Housing choice vouchers are administered locally by Public Housing Agencies (PHAs). The PHAs receive federal funds from the U.S. Department of Housing and Urban Development (HUD) to administer the voucher program.

A family that is issued a housing voucher is responsible for finding a suitable housing unit of the family's choice where the owner agrees to rent under the program. This unit may include the family's present residence. Rental units must meet minimum standards of health and safety, as determined by the PHA.

A housing subsidy is paid to the landlord directly by the PHA on behalf of the participating family. The family then pays the difference between the actual rent charged by the landlord and the amount subsidized by the program.

Fresno Housing is the PHA for the county of Fresno. The City shall collaborate with and support Fresno Housing's administration of the Housing Choice Voucher (HCV) program on an ongoing basis by:

- Providing information about HCVs at the planning counter, on the City website, and in other public places to increase awareness.
- Enforcing source of income protection and providing education to property owners on laws prohibiting the ability to refuse to rent to an applicant based on their source of income (e.g., Section 8 and other HCV programs, social security, disability).
- Assisting Fresno Housing in holding regular informational meetings and discussions with multifamily property owners and potential new landlords to expand the number of developments that accept HCV tenants.

  Collaborating with Fresno Housing to conduct outreach to developments in high and relatively higher resource and income areas, including RCAAs, about participation in the HCV program by exploring best practices to target areas for voucher education, such as areas with high-performing schools or areas with high area median income, as well as areas near jobs and transit. The City's role will be to assist in the geographic analysis necessary to target the outreach. The outreach will be performed on an annual and ongoing basis.

Responsibility	Planning & Development Department and Fresno Housing
Funding Source	HUD funding
Timeframe	Support Fresno Housing's outreach to households in high need areas as often as needed. Support Fresno Housing to conduct two to four workshops annually at varying locations throughout the city to provide mobility counseling and recruit landlords to help voucher holders find housing options in resource-rich neighborhoods.
Objective	Work with Fresno Housing to enforce source of income laws that prohibit owners from refusing to rent to HCV holders and increase landlord participation by at least 250 new units in high and relatively higher resource and income areas, including RCAAs, to support housing mobility for low-income families and special needs households.

Program 21 – Advocate for Repeal of Article 34

Article XXXIV of the State of California Constitution (Article 34) prohibits the development of low-income affordable housing with state or local public financing or assistance unless there has been local voter approval. Article 34 dampens the capacity of public housing authorities to develop affordable housing locally and statewide. The City should continue to advocate for the repeal of Article 34. The City currently has sufficient voter approval for up to 1,800 units, the most recent vote being March 6, 1979. Cumulatively, up to 1,800 units have been authorized by voters. Should Article 34 not be repealed, the City may soon be required to place a measure on the ballot to seek voter approval that would grant the City general authority to support the development of additional affordable housing units which, at a minimum, would meet the lower-income RHNA. This program would request voter approval should the balance of voter authorized units be exceeded.

Responsibility	City of Fresno; State of California
Funding Source	General Fund
Timeframe	Monitor annually to determine if Article 34 ballot measure is needed
Objective	Remove regulatory barrier associated with receiving voter approval for affordable housing development.

Goal 3: Housing and Neighborhood Conservation

Program 22 – Housing Rehabilitation

With the goal of conserving affordable housing, preventing displacement, and cultivating thriving communities, the City of Fresno will assist households who on average have below-moderate incomes by connecting them to resources and services specialized in the rehabilitation of their homes. The City shall connect homeowners with resources for eligible improvements including health and safety, hazard corrections, and accessibility modifications to reduce displacement risk and facilitate place-based revitalization. The City offers programs that provide exterior repair to seniors and provides funds to non-profits for home rehabilitation programs for lower-income households. These activities have been funded with CDBG program funds. The Senior Exterior Repair Program provides a grant to low-income seniors (62 years and older) who own and occupy their homes to make needed exterior repairs and improvements to their homes. The maximum allowable amount for a rehabilitation grant is $20,000 in 2023. The City will:

- Promote available housing rehabilitation resources, including the Fresno Economic Opportunities Commission's (EOC's) Energy Services Program that includes weatherization, on the City's website, at public counters, and in libraries. The program will also be promoted through City media outlets, community outreach, informative workshops, and partnerships with local media outlets, neighborhood associations, and community benefit organizations.

- Outreach and promotional efforts will occur in R/ECAPs, targeting households who on average have extremely low to very low incomes, households of undocumented residents, homes with substandard living conditions, and households with special needs. All materials will be made available in a variety of languages representative of Fresno including, but not limited to, Spanish, Hmong, and Punjabi.
- Offer the following assistance to homeowners in a variety of languages representative of Fresno:
  - **Technical assistance** - Guide applicants through the application process and offer technical support throughout the length of the program.
  - **Referral assistance** - Connect applicants to resources and services based on the level of repair needed.
  - **Financial assistance** - Offer rehabilitation grants to homeowners.

- Prioritize rehabilitation for households with special needs, homes with damages that pose a serious health risk, and homes with damages that are likely to be exacerbated by weather and climate change.
- Employ local licensed general and paint contractors and prioritize partnerships with contractors who predominantly employ or will employ local residents including part-time jobs for youth for the duration of their participation in the program
- Engage and consider community feedback when setting future program priorities for housing rehabilitation as part of the next Consolidated Plan update cycle.

Responsibility	Planning & Development Department
Funding Source	CDBG program funds
Timeframe	Beginning in January 2025, host two quarterly informative workshops. Half of the workshops will occur in an area accessible to residents residing in R/ECAPs. Begin outreach one month before every informative workshop by notifying Community Based Organizations and posting on social media. By March 2025, notify the community via city media outlet and community benefit organizations, and update its website to promote the development of the Program. By August 2025, begin offering rehabilitation services. By February 2026, provide annual and quarterly reports describing how many homeowners were assisted with revitalization, how many local residents were employed, a description of outreach efforts including the location where they took place. Complete 15 Senior Exterior Repair projects annually. Seek input from the community and begin setting program priorities for the Consolidated Plan in 2024.

Objective	Aim to connect at least 80-120 lower-income households with rehabilitation resources during the planning period and complete a third of these in areas of concentrated poverty with older housing stock to facilitate place-based revitalization.

Program 23 – Comprehensive Code Enforcement

The City of Fresno, in conjunction with private businesses, developers, and community-based non-profit organizations, will continue to collectively increase neighborhood revitalization activities as follows:

- The Community Compliance Unit will continue to assertively conduct targeted neighborhood inspections of housing units for potential health and safety issues. All Area Teams, as needed, will continue to improve neighborhoods throughout Fresno and increase livability by creating safe and healthy conditions, removing blight, educating citizens and connecting residents to housing rehabilitation programs and services, promoting pride of ownership, and building collaborative relationships with the community.
- The Rental Housing Unit shall continue to operate the Rental Housing Improvement Program to address the issue of substandard rental properties, promote greater compliance with health and safety standards, and to preserve the quality of Fresno's neighborhoods and available housing opportunities. The goal is to work with property owners to achieve compliance of health and safety code violations that are a threat to the occupant's safety, structural integrity of the building, and have a negative impact on the surrounding neighborhoods. The City will pursue resolution of cases identified through the inspection process, including through enforcement actions against landlords if necessary, including Administrative Citations, Penalties, Abatement by Contractor, Court Appointed Receivership, Property Liens, Judicial Remedies, Referrals, etc. The City shall work to expand awareness of the Lien Waiver Program in which the City Manager may enter into an agreement to waive fines or citations if properties are brought into compliance.
- The Special Teams Unit will continue to maintain its School Area Team, designed to conduct proactive inspections in neighborhoods surrounding schools; Waste Tire Team to remove waste tires from the city, including hosting Tire Amnesty days; the Demolition Team to ensure dangerous buildings are being demolished or fully rehabilitated; the Vacant Lots team, to ensure properties are clear of tall grass and weeds; the Illegal Dumping Team, to investigate and hold accountable those who unlawfully dump garbage in neighborhoods, streets, and alleys; and the Abatement Team to remove significant health and safety hazards and other violations pursuant to warrants.

The Legal Team will continue to seek inspection/abatement warrants and petition the court for receivership of properties unable to be brought into compliance.

Responsibility	City Attorney's Office, Code Enforcement
Funding Source	General Fund and CalRecycle Grant (for Waste Tire & Illegal Dumping Team)
Timeframe	Complete 10,000 inspections annually, pursue resolution of cases identified through the inspection process. Work with the Mayor's Office on developing an outreach strategy for the Lien Waiver Program in 2027. Ensure marketing is directed to older and disadvantaged neighborhoods.
Objective	Continue code enforcement efforts to improve and preserve the quality of housing and residential neighborhoods in Fresno. Conduct focused outreach and programming in older and disadvantaged neighborhoods in central and south Fresno, including but not limited to Downtown Fresno, Lowell/Jefferson Neighborhood, Edison Neighborhood, Southeast neighborhood, Southwest Neighborhood, Central Southeast Neighborhoods, Mclane Neighborhood, Fresno High-Roeding Neighborhood, El Dorado Park Neighborhood, and the Shaw/Marks Neighborhood. Determine any additional neighborhoods that should be identified for outreach and programming. Connect residents to available housing rehabilitation programs and services.

Goal 4: Special Needs Housing

Program 24 – Special Needs Housing

The City shall advocate for the provision of special needs housing, including disabled-accessible units and housing for persons with mental and physical disabilities. The City will provide technical support and offer incentives to housing developers, such as Fresno Housing and Self-Help Enterprises, in the application of funds for housing, including HCD (e.g., the Joe Serna grant program) and USDA Rural Development loans and grants, other programs administered by California's Office of Migrant Service (OMS) and other funding sources that may become available to meet the needs of persons with special needs (such as seniors, farmworkers, survivors of domestic violence, and people with disabilities, including persons with developmental disabilities), including the following efforts:

- Continue to implement the Universal Design Ordinance for new construction or modification of City-subsidized housing.
- The City will support and work actively to meet the housing needs of permanent and migrant farmworkers in Fresno. The City will cooperate with public and private agencies to seek funding to identify and implement strategies leading to the rehabilitation of existing and provision of new housing for farmworkers.

- The City will target code enforcement and other resources to the existing housing stock with the most need for rehabilitation and sanitary conditions that could be more likely to house farmworkers and work with regional or other organizations to improve living conditions for farmworkers.
- For new affordable housing projects developed with City assistance, incentives, and/or subject to City requirements, the City will require that the developer give qualified farmworker households a preference for at least 5 percent of the new units. Should demand from farmworker households be insufficient to fill the set-aside units, then the units will be made available to other qualified households. The City will annually reach out to affordable housing developers to gather interest and input on how to best implement this program and will provide information on available funding.
- The City will offer incentives such as density bonuses, streamlined processing, and the minor deviation process to facilitate development of farmworker housing. The City will identify development opportunities for farmworker housing at least every other year during the planning period.
- Meet with farmworker housing developers and advocates on a biannual basis to discuss their needs and offer assistance in the form of letters of recommendation for grant applications, assistance with site identification and grant opportunities, and discuss incentives for constructing farmworker housing.
- The City will annually monitor the status of farmworker housing as part of their annual report to HCD on Housing Element progress and evaluate if City efforts are effective in facilitating the provision of farmworker housing. If appropriate, the City will make necessary changes to enhance opportunities and incentives for farmworker housing development.
- Seek and apply to funding sources and partner with local and statewide organizations to facilitate the construction of units for extremely low-, very low-, and low-income income seniors (typically age 65 years and over; may vary by funding source or program).
- Use funding programs such as the Emergency Solutions Grant (ESG), and Housing Opportunities for Persons with HIV/AIDS (HOPWA) to provide financial support to organizations that provide counseling, information, education, support, housing services/referrals, and/or legal advice to extremely low-income households, to mitigate risk of displacement and support housing stability for extremely low-income households, persons with disabilities, farmworkers, and persons experiencing homelessness.
- Support needed social services and review applications annually.
- Continue to utilize available funds and/or seek funding to support the Fresno-Madera Continuum of Care, a local collaborative of homeless service providers, to construct transitional and supportive housing units.

- Provide technical assistance to developers with proposed Single Room Occupancy (SRO) facilities, transitional and supportive housing, and other special housing types to create units during the planning period.
- Provide incentives to builders to provide housing with multiple bedrooms affordable to lower- and moderate-income households to meet the needs of female-headed, single-parent, and large-family households of all income levels (possible incentives will include reduced setbacks, reduced parking requirements, and technical assistance with applications for funding).
- Encourage the provision of affordable housing for young adults, particularly former foster youth and young mothers, through planning consultations, streamlined permit processing, and funding assistance.
- The Mayor's Office of Community Affairs will assist in engaging all residents of the community including youth, Black, Indigenous, People of Color (BIPOC), Latino, Asian/Pacific Islander, Indian, and LGBTQ on their housing needs.

Responsibility	Planning & Development Department, Mayor's Office of Community Affairs
Funding Source	HUD Funds (ESG), Other Grants
Timeframe	Ongoing, as projects are processed by the Planning & Development Department. By December 2024, initiate outreach, and in 2025 conduct outreach to organizations that support extremely low-income residents and residents with special needs housing to understand funding needs. Support expediting applications on an ongoing basis. Contact nonprofit developers at least every other year to identify opportunities for the development or improvement of housing for farmworkers Monitor status of farmworker housing and evaluate effectiveness of efforts annually as part of the annual report process. Annually review the availability of funding opportunities to provide housing vouchers or other forms of rental assistance for farmworkers, and apply for funding as opportunities arise. Identify farmworker housing development opportunities throughout the city at least twice in the planning period.
Objective	Facilitate development of special needs housing, including 1,200 units for extremely low-income households and development of 100 units for farmworkers and their families. Pursue funding in collaboration with agencies serving farmworkers to support the rehabilitation and conserve an estimated 140 units serving farmworkers annually through code enforcement.

Program 25 – Development Code Amendments for Compliance with State Law and to Reduce Barriers to Housing Development

The City will amend the Development Code to address the following development standards and barriers to housing opportunities:

- **Density Bonus:** Amend the Development Code to include provisions allowing 80 percent density bonus and up to four concessions for 100 percent affordable developments consistent with the current requirements of State Density Bonus Law outlined in Government Code Section 65915. Monitor State Density Bonus Law annually for legislative changes and modify ordinance as needed during the planning period.
- **Accessory Dwelling Units:** Amend the Development Code to be consistent with the latest state legislation related to development standards for ADUs and ensuring that the construction of a junior accessory dwelling unit (JADU) on each lot is clearly permitted in addition to an ADU, in accordance with California Government Code Section 65852.2.
- **Parking Requirements:** Amend parking requirements for ADUs and supportive housing units within a half mile of transit and amend the development code to remove parking minimums within a half mile of transit consistent with AB 2097, outlined in Government Code Section 65863.2.
- **Emergency Shelters:** Adopt the updated State definition of emergency shelters and modify the parking requirement for emergency shelters to require sufficient parking to accommodate all staff working in the emergency shelter, provided that the standards do not require more parking for emergency shelters than other residential or commercial uses within the same zone, in compliance with Government Code Section 65583(a)(4). Amend the hours of operation to cover nighttime hours, and review and confirm the standards for toilets is not excessive relative to similar other uses, and overall ensure that standards for emergency shelters comply with state law (Government Code Section 65583(a)(4).
- **Low-Barrier Navigation Centers:** Permit low-barrier navigation centers, defined as low-barrier, temporary service-enriched shelters to help homeless individuals and families to quickly obtain permanent housing as a permitted use subject only to ministerial approval in zones where mixed uses are allowed or in nonresidential zones that permit multifamily housing (Government Code Section 65662; AB 101).
- **Residential Care Facilities:** Review requirements for unlicensed and licensed group homes and larger group homes and permit them in all residential zones in a similar manner to other residential uses to comply with the City's obligation to affirmatively further fair housing pursuant to Government Code Section 8899.50 (b)(1) and Government Code Section 65583 (c)(10). The City will also review CUP findings for residential care facilities to ensure they are objective and do not serve as a barrier to development. If determined to be a barrier or subjective then the City will amend CUP findings for residential care facilities.

- **Single-Room Occupancy Units:** Amend the Development Code to comply with Government Code Section 65583 (c)(1) and remove the current limit of 15 guests in SRO units, change SRO to permitted use in RM-1, RM-2, RM-3, NMX, CMX, and RMX, and evaluate objective design standards for SROs to ensure that units are maintained and safe for all residents long term.
- **Farmworker and Employee Housing:** Amend the Development Code to comply with Government Code Section 65583 (c)(1) and permit employee housing for six or fewer as a residential use and permit agricultural labor housing in all zoning districts where agricultural uses are permitted.
- **Supportive Housing:** Allow for the approval of 100 percent affordable developments that include a percentage of supportive housing units, either 25 percent or 12 units, whichever is greater, to be allowed without a conditional use permit or other discretionary review in all zoning districts where multifamily and mixed-use development is permitted, consistent with Government Code Section 65651(a).
- **Definition of "Family":** Amend the Development Code to add an inclusive definition of family and consistently replace the terms "single family" and multi-family" with "single-unit" and multi-unit" to ensure internal consistency.
- **Definition of "Tiny Home":** Amend the Development Code to expand the definition of tiny homes to allow for modular homeownership on leased parcels.

The City will consider amending the Development Code to address the following development standards and barriers to housing opportunities:

- **Overlay Zone in Transit Rich and Urban Infill Sites:** Assess benefits of implementing SB 10 (2021) and if it is found to be beneficial then amend the Development Code to add an overlay zone which would allow up to 10 residential units in certain "transit rich" and "urban infill sites."
- **Overlay Zone for Workforce Housing:** Assess benefits of implementing workforce housing and if it is found to be beneficial then amend the Development Code to add an overlay zone which would allow workforce housing in certain Commercial, Business Park, and Public Facilities zone districts.
- **Reduce Parking Requirements for Residential Care, General:** Amend the Development Code to reduce parking requirements to 1 space per employee and 1 space for every 7 residents. Parking stalls within residential garages count towards required parking spaces.

Responsibility	Planning & Development Department
Funding Source	General Fund
Timeframe	The City will initiate Development Code amendments by December 2025. In 2025, the City will assess the potential benefits of SB10 and Workforce Housing overlay zones to Fresno and if determined to be beneficial then the City will initiate a Development Code Amendment by 2026.

Objective	Annually review the effectiveness and appropriateness of the Development Code and process any necessary amendments to remove or mitigate potential constraints to the development of housing.

Goal 5: Fair and Equal Housing Opportunities

Program 26 – Fair Housing Services

The City will continue to contract with a fair housing service provider to support enforcement of state and federal Fair Housing Laws and provide fair housing services that include, but are not limited to, the following with an emphasis on providing targeted outreach and support to disproportionately burdened groups and areas of the city:

- Continue analyzing and addressing fair housing issues through the five-year review and update of the regional Analysis of Impediments to Fair Housing Choice, in alignment with HUD's updated guidelines. The City shall take meaningful actions to overcome patterns of segregation, promote fair housing choice, eliminate disparities in opportunities, and foster inclusive communities free from discrimination throughout the city by implementing the solutions developed in the Regional Analysis of Impediments to Fair Housing Choice (AI).
- Referring inquiries and landlord/tenant complaints concerning housing discrimination to the applicable regulatory body (State Department of Fair Employment and Housing, HUD, or private counsel) for processing.
- Disseminating fair housing information citywide by sponsoring workshops, housing information fairs, monitoring of affirmative marketing, and working closely with fair housing service providers to target outreach and programming to Black, Latino, and other disproportionately impacted groups, as well as neighborhoods experiencing high levels of housing issues.
- Disseminating fair housing information through radio, television, and other media in multiple languages and targeted neighborhoods to reach disproportionately impacted residents.
- Geographic coverage of the outreach should be targeted to the most vulnerable populations as depicted in Figure 1E-3.3 – Racial Segregation by Census Tract, Figure 1E-3.7-Distribution of Poverty, and Figure 1E-3.10 – Percentage of Population with a Disability.
- Advertising fair housing laws and complaint procedures through literature displays at the City. The City will provide displays to non-profit organizations such as Central California Legal Services, Lao Family Organization, Fresno Interdenominational Refugee Ministries, Fresno Center for New Americans, property management organizations, lenders, and other such organizations to help reach disproportionally impacted populations. Literature will be provided in English, Spanish, Hmong, and Punjabi.

- Improve Fair Housing complaint tracking and response; allow trusted nonprofit counselors to be added to tracking systems to aid their clients in receiving and understanding notifications on the complaint process.

As most housing discrimination complaints in Fresno are related to a disability bias, the City will work with fair housing providers to provide additional educational resources in a variety of languages to both tenants and landlords related to disability rights in housing. The City will publicize fair housing services on its website, in City Hall, and in all housing-related programming.

Responsibility	Planning & Development Department, fair housing service provider
Funding Source	CDBG
Timeframe	Update the City of Fresno Analysis of Impediments to Fair Housing Choice by 2025. Provide funding, as available, to local fair housing service providers and provide services to 1,500 persons annually consistent with the Consolidated Plan and Action Plans. Complete ongoing implementation and annual reporting throughout the planning period.
Objective	Ensure compliance with fair housing laws. Refer discrimination to appropriate State and Federal enforcement agencies. Mitigate impediments to fair housing opportunities throughout the city, with an emphasis on supporting the needs of populations and neighborhoods most impacted by fair housing issues, including but not limited to Lowell/Jefferson Neighborhood, Edison Neighborhood, Southeast neighborhood, Southwest Neighborhood, Central Southeast Neighborhoods, Mclane Neighborhood, Fresno High-Roeding Neighborhood, El Dorado Park Neighborhood, and the Shaw/Marks Neighborhood.

Program 27 – Environmental Justice

The City has initiated the preparation of an Environmental Justice (EJ) Element that will include policies and actions to lessen pollution burden on disproportionately-impacted neighborhoods through urban greening, lessening impacts of industrial uses on residential areas, reducing impacts of extreme heat, and other actions to reduce pollution exposure, and promote equitable access to public facilities, healthy food, safe and sanitary homes, and recreation and physical activity. The EJ Element will include:

1. Objectives, policies, and implementation strategies to reduce the unique or compounded health risks in disadvantaged communities by means that include but are not limited to:
    a. Reducing pollution exposure, including improving air quality
    b. Promoting public facilities access

c. Promoting food access

d. Promoting safe and sanitary homes

e. Promoting physical activity

2. Objectives, policies, and implementation strategies to promote civic engagement in the public decision making process
3. Objectives, policies, and implementation strategies that prioritize improvements and programs that address the needs of disadvantaged communities

The EJ Element is expected to be complete and incorporated into the General Plan by June of 2026.

The City will monitor the impact of the EJ Element policies in the General Plan by developing a data tracking program to assess program outcomes in disadvantaged communities. Every five years, the City will collect data to assess its performance against a minimum of five of the following types of measures using 2024 as the base year. The City will adjust policies, actions, or the approach to improve performance as needed:

- Health outcomes of residents in disadvantaged communities
- Number and percentage of homes that are within a half-mile of a grocery store of other entity that offers fresh food
- Number of homes that are within a half-mile of a park or open space as defined in the Parks Master Plan
- Tree canopy within disadvantaged areas
- Number of homes that are within a half-mile of community facilities such as community centers, libraries, and hospitals or clinics
- Number of homes that are within a half mile of high quality transit routes
- Number of jobs created or people employed in disadvantaged communities
- Amount of support (defined as technical assistance or financial support) for small businesses in disadvantaged communities through the City's and County's economic development departments.
- Number of residents that participated in a city outreach event, City Council, Commission or City meeting, or completed a City-sponsored survey.

Responsibility	Planning & Development Department in coordination with Department of Public Works, PARCS Department, Department of Public Utilities, Capital Projects Department, and Mayor's Office of Community Affairs
Funding Source	General Fund
Timeframe	Update General Plan to incorporate Environmental Justice policies by June 2026. Define metrics for tracking program and establish baseline by December of 2025. Complete first tracking report by December of 2027. Implement the EJ Element at least annually and ongoing, including applying for funding annually or as available.
Objective	Prepare an EJ Element with actions to improve public health and quality of life in disproportionately-impacted neighborhoods, including racially and ethnically concentrated areas of poverty (R/ECAPs). The City will target a 15 percent improvement in the metrics described above, once baselines are established.

Program 28 – Equitable Community Investments

The City will continue to prioritize investment in underserved neighborhoods, which includes racially and concentrated areas of poverty, with strategic projects in the areas of parks and community centers, water and sewer infrastructure, pedestrian and bicycle safety, road improvements, transit electrification, youth programs, public safety, small business investment, and urban greening and beautification. In order to build upon past work and expand future investment for equitable community investments, the City will pursue a variety of activities including increasing investment, partnership, outreach, and transparency, which will include but not be limited to the following:

- New and improved community centers in West and Central Fresno. *(Timeframe/Objective: 5 new/improved community centers during 2023-2031 planning period)*
- Transform Fresno Greening Projects, which includes investment in new and improved parks, plazas and open space in Southwest Fresno, Chinatown, and Downtown. *(Timeframe/Objective: 7-8 improvements during 2023-2031 planning period)*
- Pedestrian, bicycle, and streetscape improvements, including streetlights, planting trees, new and improved crosswalks, filling sidewalk gaps, pedestrian and bicycle bridges. *(Timeframe/Objective: 5-6 projects during 2023-2031 planning period)*
- Purchase of over $68 million in new zero-emission buses and expansion of transit service, including paratransit for persons with disabilities. *(Timeframe/Objective: Over 130 new vehicles by 2031)*
- Water, sewer, stormwater, and other infrastructure improvements to accelerate mixed-income infill housing development Downtown, Chinatown, and Southwest Fresno. *(Timeframe/Objective: $293 million by 2031)*

- The investments listed above facilitate ongoing implementation and investment in the Southwest Fresno Specific Plan (SWFSP) area, including bicycle, pedestrian and trail facilities, Fresno Greening Projects, and construction of new parks. Specifically, the Southwest Fresno Trail, the Southwest Urban Forest Project, and the MLK Park are all under construction and expected to be completed during the 2023-2031 planning period. At least annually and on an ongoing basis implement and monitor the Southwest Specific Plan and make adjustments as appropriate to ensure meeting objectives.
- The investments listed above facilitate ongoing implementation and investment in the Downtown Neighborhoods Community Plan area, including Chinatown and Downtown urban greening, pedestrian, bicycle and streetscape improvements and infrastructure improvements. Specifically, the Chinatown Urban Greening project, Chinatown Streetscape Improvements and water and sewer main replacements are expected to be completed during the 2023 – 2031 planning period. Progress the Downtown Neighborhoods Community Plan implementation will be monitored on an annual basis and adjustments made as appropriate to ensure meeting objectives.

In addition to General Funds, major sources of funding for these programs include but are not limited to:

- An estimated $40 million per year through Measure P to build new parks and improve existing parks and expand cultural programming opportunities prioritizing areas of greatest need.
- Measure C funds for bicycle, pedestrian, and other road infrastructure projects.
- $293 million from the State of California for infrastructure improvements in Downtown Fresno. This includes the Downtown Fresno Capital Improvement Project (CIP), supported by $47 million from the Infill Infrastructure Grant (IIG) program, which will include sewer main replacements across multiple streets, a water project, site preparations, surface improvements, urban greening, installation of pedestrian lighting and push buttons, and ancillary works, and construction of a centralized off-site parking structure.
- An estimated $23 million in remaining Transformative Climate Communities grant funding, which will fund investments in trails, parks, sidewalks, educational facilities, and other infrastructure improvements.

City Departments are working to transparently track investment for the public to see what and where investment is taking place and to conduct outreach and partner with the community through actions that include but are not limited to:

- Developing an online tool accessible to the public to view the location, type, value, and status of public infrastructure projects.
- Publishing a quarterly report on the planned, obligated, underway, and completed infrastructure projects as they correspond to areas of greatest need.

- Evaluating annually the distribution of infrastructure funds from all funding sources corresponding to areas of greatest need.
- Continuing to partner with local community-based organizations (CBOs) and local affordable housing developers, with a focus on building local capacity, to seek funding and implement programs in the areas of highest need in the city.

Responsibility	All City Departments
Funding Source	General Fund; Capital Improvement Funds; state and federal funding as available including HUD Funds (CDBG).
Timeframe	Annually prioritize investments and annually seek grant funding targeting areas of greatest need, including racially and ethnically concentrated areas of poverty Continue to implement place-based improvements throughout the 2023-2031 planning period in areas of greatest need, including racially and ethnically concentrated areas of poverty. Develop an online tool accessible to the public to view projects by July 2025. Once the tool is created, track infrastructure projects by opportunity area classification (e.g., low resource areas vs high resource areas) and report quarterly online and annually through the Annual Progress Report. As individual planning efforts are completed, implement the plans and evaluate their effectiveness annually, making adjustments as appropriate to ensure their objectives are achieved, such as compatibility between residential and industrial uses. If land use is changed from an adopted use in a specific plan, the City will evaluate impacts and create new targets to better balance for residential-industrial compatibility.
Objective	Prioritize investment in underserved neighborhoods, which includes racially and concentrated areas of poverty, including but not limited to Downtown, Edison Neighborhood, Southeast Neighborhood, Jane Addams Neighborhood, Southwest Neighborhoods, Central Southeast Neighborhoods, McLane Neighborhood, Fresno High-Roeding Neighborhood, El Dorado Park Neighborhood, and Shaw/Marks Neighborhood. See individual objectives above related to targeted investments.

Program 29 – Equitable Engagement

The Office of Community Affairs was created within the Mayor's Office to provide greater access to historically underrepresented communities. The OCA offers services and resources for Fresno residents. It engages all members of the Fresno community by serving as the City government's liaison to key constituent groups, associations, multicultural and immigrant populations, faith-based, civic and human service, and others including community benefit organizations. The OCA connects marginalized communities with City services and resources; these communities include the Asian/Pacific Islander community, Black Indigenous and People of Color community, Indian community, Latino community, and LGBTQ community with representation through community coordinators.

The goal of the OCA is to bring underserved communities a voice and create a network for community organizations, community members, and community businesses to feel represented, heard, and connected to city government. The OCA serves as a welcoming presence to make residents comfortable bringing questions, concerns, and comments to city hall, providing a connection with someone who can speak their language and understand their needs, and building trust. The City of Fresno leadership is committed to providing resources for underserved communities and the OCA is intended to bridge the gaps between City Hall and the residents of Fresno.

Responsibility	Office of Community Affairs
Funding Source	General Fund
Timeframe	At least annually and ongoing
Objective	Expand outreach and public education strategies to increase engagement amongst historically underrepresented populations and residents with the greatest need, including within the context of the City's long range and community planning functions as well as the land use entitlement process.

Program 30 – Workforce Development

The City will work collaboratively with regional partners to improve job opportunities for residents in sectors that provide not only entry level employment opportunities, but paths that lead to higher paying jobs and better housing. This will include continuation of the following programs and expanding targeted job training as possible:

- Through the **One Fresno Youth Jobs Corps Program,** the City hires youth ages 16-30 years old, pays them a livable wage, provides training and wrap-around services and puts them on a career pathway for future City or outside organization employment in that field. The program focuses on hiring youth that face barriers, including but not limited to youth who are low-income, justice-involved, transitioning from foster care, and/or unhoused or at-risk of becoming unhoused.

- **Local Conservation Corps (LCC)** LCC provides young adults (ages 18-26) with paid job training and educational opportunities. Corps members (participants) provide service to the community through paid vocational training while advancing their education.
- **Valley Apprenticeship Connections (VAC) Construction Pre-Apprenticeship Program** Fresno EOC VAC program provides a 12-week pre-apprenticeship training to prepare individuals for the construction industry.
- **Workforce Connection Young Adult Program** is an Academic Tutorial and Career Readiness Program providing a comprehensive array of services that focus on assisting young adults with one or more barriers to employment to prepare for post-secondary education and employment opportunities, attain educational and/or skills training credentials, and secure employment with career or promotional employment opportunities. Workforce Connection focuses primarily on serving youth who live south of Shields Ave. in the Fresno metropolitan area. Additionally, the program also serves Urban East, which encompasses Urban Fresno and Clovis to the east of Highway 41.

Responsibility	Office of the Mayor; Fresno Regional Workforce Development Board; Economic Opportunities Commission
Funding Source	State and federal grant funding
Timeframe	Ongoing, continue to implement
Objective	Provide job training programs to improve economic opportunities

Goal 6: Energy Conservation and Sustainable Development

Program 31 – Reduce or Waive Fees for Vehicle Miles Traveled (VMT)

New CEQA rules on Vehicle Miles Traveled (VMT) require projects to mitigate the number of VMTs generated above the adopted threshold. Projects within 1/2 mile of high quality transit corridors are mostly exempt, as are projects that include a "high" amount of affordable housing. The City will determine what that percentage will be. The City is developing a VMT program which includes a VMT mitigation fee that would pay for active transportation capital improvements which reduce vehicle miles traveled.

Responsibility	Planning & Development Department
Funding Source	General Fund
Timeframe	Establish an affordable housing threshold by 2026 Establish VMT Mitigation Fee by 2026
Objective	Reduce costs and application processing times associated with VMT analysis for new developments that include affordable housing and support improvements for active transportation infrastructure

Goal 7: Prevent Displacement and Homelessness

Program 32 – Opportunity to Purchase Act

The City shall research best practices related to Right of First Refusal and Opportunity to Purchase Act (OPA) programs in California, and based on the findings of the research, consider establishing an OPA ordinance or similar policy that would give tenants and qualifying non-profits priority to purchase a building that has entered pre-receivership with the Anti-Slum Enforcement Team (ASET) Division. The City shall seek public input, coordinate with non-profits, and collaborate with the California Apartment Association (CAA) and Community Based Organizations (CBOs) that work closely with low-income communities in racially and ethnically concentrated areas, on the potential adoption of an OPA ordinance, including targeted outreach to stakeholders such as Central California Legal Services (CCLS) and organizations representing lower-income households and special needs groups.

Responsibility	Planning & Development Department, CBOs, and CAA
Funding Source	Private funding
Timeframe	Work with CBOs and CAA to collaborate on review of OPA programs and policies throughout 2025. Provide recommendations to the City in the form of a report by the end of 2026.
Objective	Allow qualifying tenants and local non-profits the opportunity to purchase existing buildings to be used and/or maintained for affordable housing, with 30 percent of purchases targeting relatively higher resource and income areas including RCAAs. Upon OPA Ordinance adoption, provide opportunity to purchase for 10% of buildings that enter pre-receivership.

Program 33 – Mobile Home Parks

The City shall maintain the responsibility for enforcement of the California Mobilehome Parks Act at all mobile home parks located within the city limits. Almost 4,000 mobile home units exist in Fresno in 27 mobile home parks. Mobile home parks represent one of the few remaining sources of unsubsidized affordable housing in the city, and they also provide opportunities for homeownership to individuals and households who might not be able to afford other housing purchase options. As real estate prices rise, mobile home park owners may seek to close parks so that the land can be sold and converted to other uses. Deferred maintenance of a mobile home park can lead to substandard conditions that can also eventually lead to park closures. In an effort to preserve the city's mobile home parks, the City shall implement the following:

- Enforce the California Mobilehome Parks Act throughout the City.

- Evaluate the effectiveness of the existing Mobilehome Park Rent Review & Stabilization Ordinance and engage residents and commissioners in consideration of policy changes, including the rent review process.
- Establish regulations to protect affordable housing on property currently occupied by mobile home parks. If the property is proposed for conversion from a mobile home park, it will be required to redevelop with a number of covenanted affordable units equal to the number of mobile home units lost in the conversion, or 10 percent of new units, whichever is higher. If the underlying zone district does not allow for housing, the City shall require the project proponent of a non-residential project to find a replacement site in an area where housing is an allowed use, and provide relocation benefits to any mobile home park residents displaced by the proposed project.
- Continue to support the Mobile Home Rent Review & Stabilization Commission which serves the purpose of protecting mobile home park residents from excessive rent increases.
- Provide reactive and proactive inspections of the conditions of mobile home parks. Hold meetings at mobile home parks to explain the enforcement process.
- Provide annual notification to park owners about rent increase applications.
- Maintain a list and map of mobile home parks in Fresno.
- Compile a list of resources and provide technical assistance to mobile home residents and park owners to facilitate the maintenance and preservation of mobile home parks. Provide relevant information to interested mobile home park residents, owners, and non-profit organizations.
- Make funding available for home repairs, including weatherization, to owner-occupied mobile homes of low-income homeowners.
- Promote available housing rehabilitation and weatherization resources on the City's website, at public counters, and in libraries. Provide relevant information to interested mobile home park residents, owners, and non-profit organizations. Offer assistance to homeowners in a variety of languages representative of Fresno including, but not limited to, Spanish, Hmong, and Punjabi.
- Conduct targeted outreach to inform park owners, mobile home owners, and other eligible applicants of rehabilitation assistance in local mobile home parks through the Mobile Home Park Repair Program, and the State's Manufactured Housing Opportunity & Revitalization Program (MORE).
- Provide assistance with funding applications to mobile home park owners, residents, and non-profit organizations to assist in mobile home park preservation and improvement.
- Work with HCD to approve using PLHA funds to establish a mobile home repair program to provide critical repairs to owner-occupied mobile homes, including weatherization and improvements for indoor air quality.

Responsibility	City Attorney's Office, Code Enforcement Division; Planning & Development Department
Funding Source	General Fund; Permanent Local Housing Allocation (PLHA)
Timeframe	Work with HCD to approve use of PLHA funds for a mobile home repair program in 2024. Compile a list of mobile home preservation experts and non-profits by the end of 2024 and maintain existing list of mobile home parks annually. Compile and distribute a list of financial resources for residents and park owners for maintenance and preservation biennially starting in 2025.Conduct biennial outreach to and engagement with mobile home park residents, park owners, preservation experts, and non-profit organizations interested in preservation of mobile home units, starting in 2025. Begin outreach one month before every informative workshop by notifying community benefit organizations and posting on social media. Annually, report on the number of homeowners assisted, the type and volume outreach including meeting locations, number of proactive maintenance inspections conducted, and number of rent increases evaluated.
Objective	Preserve mobile homes as opportunities for homeownership to individuals and households who might not be able to afford other housing purchase options through code enforcement, funding opportunities, prevention of excessive rent increases, and resident engagement. Conduct proactive maintenance inspections of 13% of mobile home parks annually, exceeding the 5 percent required by HSC §18400.1. Conduct outreach meetings at 13 percent of mobile home parks annually. As rent increases are proposed, protect mobile home park residents from excessive rent increases. Connect a minimum of 58 lower-income families with rehabilitation, home repair, and weatherization grant assistance to preserve affordable ownership housing.

Program 34 – Eviction Protection Program

The City shall continue to seek funding for the Eviction Protection Program to fight potentially unlawful evictions in accordance with the California Tenant Protection Act. The Eviction Protection Program (EPP) defends tenants renting an apartment or house in the city of Fresno from unlawful eviction in support of enforcement of the California Tenant Protection Act. If the City determines a tenant is potentially facing unlawful eviction, the tenant may be eligible to receive a City-appointed attorney or legal services to assist in the judicial process at no charge. This program is open to any city of Fresno resident who is facing an unlawful eviction regardless of financial or documented status. Common reasons for unlawful evictions include retaliation for reporting code enforcement violations, discrimination, unlawful rent increases, and many more.

Responsibility	City Attorney; Finance Department, Local Housing Trust Fund– Grants Management Unit
Funding Source	General Fund; US Treasury and CA Department of Housing and Community Development (ARPA), HUD Eviction Protection Grant Program
Timeframe	Funding will be expended by the end of fiscal year 2025. The City will seek additional funding to support the Eviction Protection Program, an original element of the Emergency Rental Assistance Program. Marketing and outreach shall occur on an ongoing basis as funds are available.
Objective	Assist 500 tenants annually with eviction defense ranging from legal advice through representation in court.

Program 35 – Replacement Units

To reduce displacement risk, the City will require replacement housing units subject to the requirements of California Government Code Sections 65915 and Housing Crisis Act (66300 et. seq.) on sites identified in the sites inventory or other areas as appropriate when any new development (residential, mixed-use, or nonresidential) occurs on a site that has been occupied by or restricted for the use of lower-income households at any time during the previous five years. This requirement applies to non-vacant sites and vacant sites with previous residential uses that have been vacated or demolished.

Responsibility	Planning & Development Department
Funding Source	General Fund; Developer Fees
Timeframe	Ongoing, the replacement requirement will be implemented immediately and applied as applications on identified sites are received and processed. Administrative processes and project application forms will be updated to reflect Housing Crisis Act requirements by June 2025.

Objective	Prevent displacement and enforce the provision of replacement housing units subject to the requirements of California Government Code Section 65915 and Housing Crisis Act (66300 et. seq.).

Program 36 – Homeless Assistance

The City is committed to addressing homelessness and is working on a variety of actions in collaboration with service agencies and providers to provide shelter, housing, and case management services to those in need. The City will apply or support applications for funding for emergency shelters, transitional or supportive housing. The City will continue to use Emergency Solutions Grant (ESG) Program funds to support needed social services and review applications annually. The City is also utilizing the HOME Investment Partnerships (HOME) Program and is contracted with Fresno Housing to implement a tenant-based rental assistance program for persons that are homeless, threatened with homelessness, or in need of housing assistance after completing a transitional living program. The City will take the following actions to provide assistance and resources to those experiencing unsheltered homelessness:

- Cooperate with neighboring cities, the County, and other agencies in completing the Point-in-Time count every other year. Reach out to local colleges and universities and local and regional homeless service providers by July 2024 to identify partnership opportunities to conduct Point-in-Time counts.
- Establish a pilot program funded by Encampment Resolution Funding (ERF) to resolve the experience of unsheltered homelessness for people residing in encampments in the Downtown and Southern Blackstone Corridor areas (see Figure 1E-3.33 in Chapter 3) by establishing a Rapid Rehousing and Case Management Program for 100 persons for up to 24 months at certified Independent Living Homes (ILH) throughout the City.
- Provide available funding for emergency shelter types to accommodate the unhoused, including shelter for victims of domestic violence, facilities for LGBTQ+ community members, and facilities that serve families and households with dependent minors which may include but are not limited to pregnant parents, parenting youth, households engaged in reunification and/or child welfare services in need of funding to render said services with the goal of supporting a minimum of 500 shelter beds.
- Establish a reserve fund for operations, support services, maintenance, and repair for various types of shelters and activities (e.g., case management provided at shelters and triage centers, including sleeping cabins, and Project Homekey-funded shelters/triage centers).
- Support the temporary transition of former motels into emergency shelter and permanent supportive housing through private partnerships and the use of Low-Income Housing Tax Credits (LIHTC).
- Leverage the Homeless Assistance Response Team (H.A.R.T) to provide direct services, street outreach, and case management services, including outreach to link unhoused residents with mental health and substance treatment services.

- Support the Voucher Incentive Program (established in 2023) which recruits landlords to house families experiencing homelessness or who are at risk of homelessness. The Voucher Incentive Program provides financial compensation to landlords that, for the first time, rent units to Housing Choice Voucher holders who otherwise would not be able to identify a leasable unit.
- Work with local service providers to explore the feasibility of a safe parking program which would designate parking lots for people living out of their vehicles to safely stay overnight and provide services to help navigate them toward permanent housing.
- Provide mobile showers and restrooms for unhoused individuals through the Homeless Services Division.
- Provide crisis intervention training to City staff that work with the unhoused community.
- Assess how many youth are at risk of homelessness (couch surfing, aging out of foster care) and partner with local school districts and colleges to develop targeted strategies to address the needs of at risk youth.

The City has committed to the following 7 principles, developed by the United States Interagency Council on Homelessness, for developing and implementing responses to encampments:

- Principle 1: Establish a Cross-Agency, Multi-Sector Response.
- Principle 2: Engage Encampment Residents to Develop Solutions.
- Principle 3: Conduct Comprehensive and Coordinated Outreach.
- Principle 4: Address Basic Needs and Provide Storage.
- Principle 5: Ensure Access to Shelter or Housing Options.
- Principle 6: Develop Pathways to Permanent Housing and Supports.
- Principle 7: Create a Plan for What Will Happen to Encampment Sites After Closure.

Responsibility	Planning & Development Department
Funding Source	HUD Funds - ESG, HOME, State Funds - Project Homekey, Homeless Housing Assistance Prevention (HHAP)
Timeframe	Identify partnership opportunities to conduct Point-in-Time counts and surveys by December 2024. Annual implementation as part of the Emergency Shelter Grant and Continuum of Care funding process and complete annual reporting for HUD entitlement funds throughout the planning period.

Objective	Invest in various housing and emergency shelter types to serve people experiencing homelessness with the goal of sustaining an inventory of at least 500 shelter beds and creating 400 new units of permanent supportive housing. Target investments in areas where the homeless population can more easily access services and public transportation in the central core of the city, including Downtown and along commercial corridors such as Blackstone Avenue.

Program 37 – At-Risk Housing

The City will continue to undertake the following activities during the Housing Element planning period to guard against the loss of covenanted affordable housing units available to lower-income households. The efforts listed below represent a varied strategy to mitigate potential loss of at-risk units due to conversion to market-rate units. These local efforts use existing City and local resources and include efforts to secure additional resources from the public and private sector should they become available.

- Contact property owners of units at risk of converting to market-rate housing within three years of affordability expiration to discuss the opportunity to preserve complexes as affordable housing.
- Provide ongoing preservation technical assistance and education to affected tenants and the community at-large on the need to preserve the existing affordable housing stock.
- Monitor covenanted affordable housing projects reaching the end of their covenant timeframes on an ongoing basis, at least annually, in coordination with other public and private entities to determine their interest in selling, prepaying, terminating, or continuing participation in a subsidy program.
- Monitor at-risk projects through the use of existing databases (e.g., HUD, State HCD and California Tax Credit Allocation Committee).
- Respond to any federal and/or state notices, including Notice of Intent to Pre-Pay, owner Plans of Action, or Opt-Out Notices filed on local projects, by contacting property owners upon receipt of notices.
- Work with Fresno Housing to determine the availability of tenant-based vouchers for tenants who choose to move from at-risk units or are displaced by conversion.
- Establish contact with public and non-profit agencies interested in purchasing and/or managing units at-risk to inform them of the status of such projects. Where feasible, provide technical assistance and support to these organizations with respect to financing. The City will actively pursue affordable housing opportunities and maintain a list of interested and qualified affordable housing developers.

In the event at-risk units are not preserved, the City shall require projects that received government funding and/or were granted a density bonus to comply with the required noticing procedures under state law, including providing at least three years notice prior to the conversion of any deed-restricted affordable rental units to market rate and providing additional notice at 12 and 6 months. The City shall also minimize displacement of current tenants by negotiating an anti-displacement policy or relocation mitigation with the owner, whenever possible, and providing support and education to tenants at least 6 months prior to conversion.

Responsibility	Planning & Development Department; affordable housing developers
Funding Source	HOME Program funds, LIHTC, Cap & Trade, other available funding sources
Timeframe	The City will monitor, every six months, the status of any HUD receipt/approval of Notices of Intent and Plans of Action filed by property owners to convert to market-rate units. The City will annually explore funding sources available to purchase affordability covenants on at-risk projects, transfer ownership of at-risk projects to public or non-profit agencies, purchase existing buildings to replace at-risk units, or construct replacement units. When covenants are expiring, contact property owners to gauge interest in continuing project affordability and pursue funding and preservation strategy on a project basis. Upon receipt of opt-out notices, the City will work with tenants of at-risk units and provide them with education regarding tenant rights and conversion procedures.
Objective	Preserve 313 at-risk units from converting to market rate housing. *(Planning Period 2021-2031)*

QUANTIFIED OBJECTIVES

Table 1E-1.1 summarizes the City's quantified objectives for the 2023-2031 planning period by income group.

Table 1E-1.1: Summary of Quantified Objectives, 2023-2031

Program Types	Extremely Low-Income	Very Low-Income	Low-Income	Moderate-Income	Above Moderate-Income	Total
New Construction						
2023-2031 RHNA	4,720	4,720	5,884	5,638	15,904	36,866
Rehabilitation						
Housing Rehabilitation (Program 22)	20	20	80			120
Conservation/Preservation						
Homebuyer Assistance (Program 19)			20	20		40
Housing Choice Vouchers (Program 20)	60	65	125			250
Homeless Assistance (Program 37)	500	400				900
At-Risk Housing (Program 38)			313			313

Source: City of Fresno, 2024.

SECTION 1E-2: SITES INVENTORY

Introduction

Government Code Section 65583(a) requires local governments to prepare an inventory of land suitable for residential development, including vacant sites and sites having the potential for redevelopment. The inventory of land suitable for residential development shall be used to identify sites that can be developed for housing within the planning period. Government Code Section 65583(a) also requires an analysis of the relationship between zoning and public facilities and services to those sites.

Regional Housing Needs Allocation

California General Plan law requires each city and county to have land zoned to accommodate its fair share of the regional housing need. HCD allocates a numeric regional housing goal to the Fresno Council of Governments (FCOG). FCOG is then mandated to distribute the numerical goal among the 15 cities in the region and the County. This share for the FCOG region is known as the Regional Housing Needs Allocation (RHNA). The major goal of the RHNA process is to ensure a fair distribution of new housing construction among cities in the region and the County so that every community may plan for a mix of housing types for all economic segments.

The housing allocation targets are not building requirements; rather, they are planning goals for each community to accommodate through appropriate planning policies and land use regulations. Allocation targets are intended to ensure that adequate sites and zoning are made available to address anticipated housing demand during the Housing Element planning period.

The RHNA for the FCOG region covers an 8.5-year projection period (June 30, 2023, to December 31, 2031)[1] and is divided into four income categories: very low, low, moderate, and above moderate. As determined by FCOG, the City of Fresno's allocation is a total of 36,866 new housing units, divided among the four income categories as shown in **Table 1E-2.1**.

Table 1E-2.1: Regional Housing Needs Allocation (June 30, 2023, to December 31, 2031)

	Very Low Income (<50% of AMI)	Low Income (50% to 80% of AMI)	Moderate-Income (80% to 120% of AMI)	Above Moderate-Income (>120% of AMI)	Total
Housing Units	9,440[1]	5,884	5,638	15,904	36,866

AMI = Area Median Income

[1] Extremely low-income allocation is equal to 50 percent of very-low income allocation (4,720 units).

Source: FCOG Sixth Cycle RHNA Final Methodology, July 2022.

State law also requires the City to identify the projected need for extremely low-income housing. The City assumes that 50 percent of the very low-income housing need is equal to the extremely low-income housing need. As such, there is a projected need for 4,720 extremely low-income housing units.

[1] The Housing Element planning period differs slightly from the RHNA projection period. The Housing Element covers the planning period of December 31, 2023, through December 31, 2031.

Approved Residential Projects

Jurisdictions may count toward the RHNA any housing units in residential development projects that are approved but have not yet been issued building permits or were issued permits after the start of the RHNA projection period (June 30, 2023). **Table 1E-2.3** includes approved residential development projects that are credited toward the RHNA. Only deed-restricted affordable units are counted toward the lower-income RHNA. Market rate multi-family rental units are counted as 50 percent moderate- and 50 percent above moderate-income based on market rents of recently built multifamily housing, which tends to be affordable to moderate income households (see **Table 1E.2.2** and associated analysis below). Where projects are described as luxury duplexes or gated communities, the units are all counted as above moderate-income rather than the 50/50 split. Market rate rental or ownership townhomes and other ownership housing is counted as above moderate-income housing. The Housing Element includes an implementation program to monitor the affordability of projects as they come to fruition to ensure that these assumptions remain valid. The City will adjust affordability assumptions in the inventory if rent and sale prices differ. If the adjustment of affordability assumptions results in a deficit in capacity to meet the RHNA, the City will take action to identify capacity to meet a shortfall in accordance with "no-net-loss" zoning requirements in Government Code Section 65863.

Approved residential projects also include single family residential subdivisions that are under construction. **Table 1E-2.4** lists these subdivisions with the number of unbuilt lots counted toward the RHNA. These single-family lots are counted as above moderate-income housing. In total, there are 2,757 units in approved developments counted toward the RHNA. This includes 152 extremely low-, 140 very low-, and 317 low-income deed-restricted affordable units. It also includes 1,041 market rate apartment units inventoried as moderate-income and 1,107 above-moderate-income units. These approved residential developments and subdivisions are shown on **Figure 1E-2.7**.

Affordability of Market Rate Multi-family

Based on a review of rental listings at recently built apartments, it was determined that new market-rate apartments in Fresno are generally affordable to moderate-income households. **Table 1E-2.2** below compares affordable monthly rents for moderate-income households earning 100 percent and 120 percent of the area median income (AMI) with 2024 listed rents for recently built market-rate complexes in the city. One-bedroom units are generally affordable to one- and two-person moderate income households earning 120 percent AMI. Two- and three-bedroom units are generally affordable to 2- and 3- person moderate-income households earning around 120 percent AMI. Three apartment complexes, Avalon Apartments, The Orchards Apartments at New Fig Garden, and The Villas at Fancher Creek, offer 1-bedroom units that are within reach for 2-person moderate income households earning between 100 percent and 120 percent AMI. The Villas at Fancher Creek also offer 1-bedroom, 2-bedroom, and 3-bedroom units that are within reach for moderate income households earning 100 percent AMI. Only a couple of the recent developments have listed rents that slightly exceed the affordable monthly rents for moderate-income households. Based on this analysis, market rate multifamily housing in the pipeline projects (Table 1E-2.3) are assumed to be 50 percent moderate-income and 50 percent above moderate-income.

Table 1E-2.2: Analysis of Market-Rate Rental Affordability

Income Level (2023)	Affordable Monthly Rent[1]			
	1-Person	2-Person	3-Person	4-Person
Moderate Income at 100% AMI	$1,466	$1,676	$1,885	$2,095
Moderate Income at 120% AMI	$1,760	$2,011	$2,263	$2,514
Apartment Complex (Year Built)	**1-bedroom**		**2-bedroom**	**3-bedroom**
525 San Jose Apartments (2020)	$1,850		$1,950-$2,095	$2,350
Avalon Apartments (2022)	$1,595 - $1,665		$1,950 - $2,040	$2,225 - $2245
B Street Apartments (2022)	N/A		$1,650.00	$1,850.00
Brookside Villas (2019)	$1,745.00		$1,925 - $2,000	N/A
Casa di Fortuna Luxury Townhomes (leased) (2022)	N/A		$1,995 - $2,150	$2,395.00
Coronado Luxury Apartments (2023)	$1950-$2050		$2,020-$2,600	$2,375
Drew Court (2019)	N/A		$2,090 - $2,100	N/A
The Orchards Apartments at New Fig Garden (2022)	$1,595-$1,645		$1,850-$1,895	$1,995-$2,195
Rock Ranch Apartments (2021)	$1,882 - $1,964		$1,945 - $2,090	$2,371.00
Tempranillo Apartment Homes (2019)	$1,975.00		$2,163.00	$2,369.00
The District (condominiums) (2022)	$1,690.00		N/A	N/A
The Lark at Copper River (2020)	$2,056 - $2,136		$2,067 - $2,759	$2,607 - $3,157
The Rousseau Luxury Apartments (2023)	$1,850.00		$1,995 - $2,100	$2,290 - $2,400
The Row (2019)	$2,056 - $2,137		$2,200 - $2,725	$2,508 - $2,736
The Villas on Fancher Creek (2023)	$1,175 - $1,295		$1,175 - $1,525	$1,395 - $2475
Vintage Park (2018)	$1,725 - $1,805		$1,975 - $2,005	$2,275 - $2,355

AMI = Area Median Income
[1] Affordable monthly rents based on 2023 HCD Income Limits.
Sources: City of Fresno and Ascent, April 2024.
https://rentgranville.com/estate_property/525-san-jose/; https://www.avalonfresno.com/floorplans; www.bstreetapts.com; https://rentgranville.com/estate_property/brookside-villas/; www.cdfhomes.com; https://www.coronadofresno.com/floorplans; www.drewcourt.com; https://www.theorchardshomes.com/; www.rockranchapts.com; www.liveattempranillo.com; www.rentgranville.com/estate_property/the-district/; www.liveatthelark.com/the-lark-at-copper-river-fresno-ca/; www.rousseauapts.com; www.therowresidences.com; www.affordablehousing.com/fresno-ca/the-villas-on-fancher-creek-578211/; www.vintageparkfresno.com

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Table 1E-2.3: Planned or Approved Projects, City of Fresno, February 2024

ID	Project Name	APN(s)	Census Tract	Address	Tracking ID	Project Status	Units by Income Level					Total Units	Project Description	Phasing, Anticipated Build-out, and Known Barriers to Development	Projected Rents for Market Rate Projects
							ELI	VLI	LI	M	AM				
P-1	Village at West Creek North	47906013	9.01	571 E Jensen Ave	P23-04115	This project was approved and receive entitlement on December 22, 2023.	64	13	43	0	1	**121**	Development of 121 affordable rental housing units as Phase 1 of the West Creek Village master planned community by Self Help Enterprises. Funded by LIHTC, NTHF, HOME, and CA Housing Accelerator with 55-year Declaration of Restrictions. It is a mixture of two and three-story buildings with 38 one-bedroom units, 51 two-bedroom units, and 32 three-bedroom units. Residential Multi-family, Medium High Density (RM-1) Zone District at 25 dwelling units/acre.	3 phases – expect to start phase 1 by January 2025 but challenge is getting funded because it's oversubscribed.	Will be dictated by funding source but in phase one 30 units will be for very low income.
P-2	Step Up on 99	44923201 44923202	20	1240 N Crystal Ave 102	P21-02291, B23-05208, B23-05213, and B23-07481	This project was entitled in June 2021 and submitted for building permits in May 2023. Building permits were issued (at risk) on June 30, 2023. Construction is underway as of February 2024.	21	28	13	0	1	**63**	Hotel conversion to deed-restricted affordable units and one manager's unit and construction of one new building on APN 44923201. Fresno Housing Authority. Homekey and LIHTC funded FHA project; 21 units at 30% AMI, 8 units at 40% AMI, 20 units at 50% AMI, and 13 units at 60% AMI, and 1 manager's unit at market rate. Neighborhood Mixed Use (NMX) Zone District at 29 dwelling units/acre.	Phasing: 1) demolition of current lobby/on-site manager building; 2) adaptive reuse of existing motel rooms; 3) additional landscaping and outdoor community spaces. Anticipated completion by Dec 2024.	N/A
P-3	Peach-Tulare Apartments	46309011 46309028 46309057 46309059	29.03	N/A	P19-06061	This project was approved and received entitlements on August 28, 2020 and June 6, 2021. Entitlements extended through August 27, 2025.	0	0	0	65	64	**129**	129 units of market rate rental two- and three-bedroom apartment units. House demolished on APN 46309057 under demolition permit B21-04991. Residential Multi-family, Urban Neighborhood (RM-2) Zone District at 30 dwelling units/acre.	Unknown	Unknown
P-4	Maple Luxury Living Duplexes	47130228	13.04	2056 S Maple Ave	P20-01643 B21-02221 to B21-02232	This project was approved and received entitlements on 10/29/2021. The entitlement will expire on 10/21/2024 unless it receives an extension. Submitted for building permits on 3/17/2021 but building permits have not yet been pulled.	0	0	0	0	23	**23**	23 units of luxury market rate duplexes. Residential Single-family, Medium Density (RS-5) Zone District at 12 dwelling units/acre.	Barriers identified by applicant: price of lumber and interest rates	Unknown
P-5	Jensen-Maple Mix of uses on one parcel (RM-3, CC, and IL)	48003060	12.02	4645 E Jensen Ave	P20-00636, P24-01220, P24-01186, AD23-03130, BG23-00006	This project was approved and received entitlements on March 5, 2021. Site grading and utility improvements are underway but building permits have not yet been issued.	0	0	0	75	75	**150**	Mixed-use commercial, light industrial, and 150 market rate multi-family. Four-story rental residential units and a day care center. Rental studio, one-, and two-bedroom apartment units. Residential Multi-family, High Density (RM-3) Zone District at 13 dwelling units/acre (43 du/acre for RM-3 part of the parcel). Approximately 31,000 sq ft of commercial proposed on Community Commercial (CC) and Light Industrial (IL) zoned part of the parcel.	Unknown	Unknown

ID	Project Name	APN(s)	Census Tract	Address	Tracking ID	Project Status	Units by Income Level					Total Units	Project Description	Phasing, Anticipated Build-out, and Known Barriers to Development	Projected Rents for Market Rate Projects
							ELI	VLI	LI	M	AM				
P-6	The Park	46828205T 468282022T 468282023T	1	829 Fulton St	P21-04764	This project was approved and received entitlements on December 27, 2021.	0	0	0	81	80	**161**	Mixed-use with ground floor commercial and five floors of 161 rental one-bedroom apartment units. Downtown Core (DTC) Zone District at 206 dwelling units/acre. Parcels 4688205t and 22T are owned by the Redevelopment Agency of Fresno and APN 46828223T is a City-owned parking lot	Unknown	Unknown
P-7	Villa Di Abaldo	40353228	1	8715 N Chestnut Ave	P21-06232, P23-01723	This project was approved and received entitlements on May 11, 2023.	0	0	0	16	16	**32**	32 unit multi-family apartment complex with two-bedroom apartment units. House demolished under demolition permit B22-00480. Residential Multi-family, Medium High Density (RM-1) Zone District at 15 dwelling units/acre.	Unknown	Unknown
P-8	The Palms at Alluvial	40450029	55.08	2806 E Alluvial Ave	P2200795, B22-18089, and B22-18926 to B22-189239	This project was approved and received entitlements on December 2, 2022. Building permits were issued on September 26, 2023. Construction is underway as of February 2024.	0	0	0	0	28	**28**	Gated duplex community - 13 duplexes with two- and three-bedroom units and 2 single family residential detached units (T-6402). Residential Single-family, Medium Density (RS-5) Zone District at 10 dwelling units/acre.	Anticipated completion in Fall 2024	Not sure of rents, but will be market rate – will depend on construction costs and more
P-9	Bath Apartments	46202009	55.09	255 N Clovis Ave	P20-04549, B23-11359, B23-11808 to B23-11812, P22-03017	This project was submitted for entitlement review on March 5, 2021, and approved on August 8, 2022. Then the project was submitted for building permit review on July 31, 2023.	0	0	0	54	54	**108**	108 market rate rental one-, two- and three-bedroom apartment units in 6 apartment buildings. Commercial Mixed Use (CMX) Zone District at 22 dwelling units/acre.	Barrier: owner is delayed in taking the next steps.	Unknown
P-10	DADA Lofts	46620528	30.04	1433 Broadway	P21-05557, B22-19096, and B22-18971, P22-04143, P22-03142	This project was approved for entitlement on August 16, 2022 and an appeal request was made on October 24, 2022. The appeal was denied on October 5, 2023, and the project was entitled on October 31, 2023. The two buildings (Front and Rear) were submitted for building permits review on December 28 and 29, 2022 respectively and as of February 2024, the application is still being processed.	0	0	0	19	18	**37**	Downtown apartment units with 31 studio flats, 3 lofts, and 3 two-story townhome rental units in two buildings. Downtown Core (DTC) Zone District at 82 dwelling units/acre.	No completion date set yet because more funding is needed. Barriers identified by applicant: construction costs are high; bank did not appraise high enough; grants sometimes trigger prevailing wage which can actually increase the funding gap.	No projected rents yet, but want a mix with affordable

ID	Project Name	APN(s)	Census Tract	Address	Tracking ID	Project Status	Units by Income Level					Total Units	Project Description	Phasing, Anticipated Build-out, and Known Barriers to Development	Projected Rents for Market Rate Projects
							ELI	VLI	LI	M	AM				
P-11	Kings Canyon-Backer Mixed-Use	47008103 47008104 47008105	13.01	4648 E Kings Canyon Rd	P21-05694, AD23-05726, AD23-04481, B22-18546, P22-02542, P21-05694	This project was approved and received entitlements on July 1, 2022. Phase 1 Office building is under construction but building permit application for Phase 2 has not yet been submitted.	0	0	0	12	12	**24**	Phase 2 Mixed-use retail/commercial and multi-family. Mixed-use with commercial/retail and 4 rental apartment units on the ground floor and 20 rental apartment units on three floors above. Commercial Mixed Use (CMX) Zone District at 38 dwelling units/acre.	Unknown	Unknown
P-12	Mander Villa Apartment Complex	50504018	42.18	7018 W Barstow Ave	P21-04839	This project was submitted for entitlement on September 2, 2021, and approved on April 17, 2023.	0	0	0	16	16	**32**	32 market rate rental two-bedroom apartment units	Estimated construction in 2026.	Unknown
P-13	Fresno Rescue Mission - RTC 2	44209058T	20	2341 N Parkway Dr	P23-03411	This project was approved and receive entitlement on November 3, 2023	0	0	49	0	0	**49**	This Rescue the Children facility by Fresno Mission is a phased community of 49 multi-family factory-built modular homes to offer supportive affordable housing for graduates of the Rescue the Children programs and other displaced low-income individuals. Phase 1 is land, site and infrastructure development, Phase 2 is the installation of 20 modular homes, and Phase 3 is the installation of 39 modular homes and a community center. The homes vary in size from 288 square feet to 912 square feet fabricated in one, two or three unit sections and some stacked in two-floor configuration. Upon building permits being issued, it will take approximately six months for Phase 1 infrastructure to prepare the site and another six months for the completion of Phase 2. Phase 3 installation will be completed upon the funding availability for them or within one year after the completion of Phases 1 & 2, whichever is first. This is an all residential project in a Neighborhood Mixed Use (NMX) Zone District at 37 dwelling units/acre.	No planned phasing No expected start date Barriers to development identified by applicant: having difficulties with affordable housing contracts with the City	N/A
P-14	One Fresno at Manchester Center Mall	43718120	51	1901 E Shields Ave Building 101	P23-00890	This project was approved and entitled on August 4, 2023.	0	0	0	305	305	**610**	Conversion of existing commercial/office space to rental dwelling units within the Manchester Mall. The project is planned for construction in three (3) phases (unit counts approximate): Phase 1 includes 165 studios and 56 one-bedroom units, totaling 221 units; Phase 2 includes 63 studios and 15 one-bedroom units, totaling 78 units; Phase 3 includes 211 studios and 71 one-bedroom units, totaling 282 units. This is adding residential to an existing mall that currently has no residential and is zoned Commercial Regional (CR) Zone District at 22 dwelling units/acre.	Unknown	Unknown

ID	Project Name	APN(s)	Census Tract	Address	Tracking ID	Project Status	Units by Income Level					Total Units	Project Description	Phasing, Anticipated Build-out, and Known Barriers to Development	Projected Rents for Market Rate Projects
							ELI	VLI	LI	M	AM				
P-15	Latitudes at Armstrong	31025013	58.05	2594 N Armstrong Ave	P22-02376 and B22-19031 to B22-19091, AD24-00894, AD24-00884, P23-02822	This project was submitted for entitlement on June 20, 2022, and received approval on August 15, 2023. Applicant submitted construction drawings to City for building plan check review on December 23, 2022, and is making corrections in preparation to resubmit to City.	0	0	0	32	32	**64**	64 market rate rental one-, two- and three-bedroom apartment units. Residential Multi-family, Medium High Density (RM-1) Zone District at 15 dwelling units/acre.	Under construction with anticipated completion of Fall 2025	Unknown
P-16	Helm Tower Office and Lofts	46621204	1	1105 Fulton St	P22-01922	This project was submitted for entitlement on May 16, 2022, and approved for entitlement on January 8, 2024.	0	0	0	50	49	**99**	Conversion of an existing vacant 10-story retail building into mixed-use retail and 99 units of market rate multi-unit residential. Mixed-use with retail on ground floor and floors 2 through 10 converted into rental studio apartment units. Downtown Core (DTC) Zone District at 341 dwelling units/acre.	Unknown	Unknown
P-17	Green Valley Apartments	47216201	14.07	717 S Adler Ave	P22-02697	This project was submitted for entitlement review on July 15, 2022, and approved on April 12, 2023.	0	0	0	4	4	**8**	8 units market rate multi-family rental three-bedroom apartment units. Commercial Mixed Use (CMX) Zone District at 31 dwelling units/acre.	Anticipate building permits may take 2 months, but no other issues at this time	Unknown
P-18	Ashlan Inn	51010047S	38.09	4278 W Ashlan Ave	P22-00797 and B22-12673	This project was approved and entitled on August 15, 2022. Then received building permits on August 15, 2023, and construction is underway as of February 2024.	0	0	0	62	63	**125**	Hotel to dwelling unit conversion to 125 housing units. This is an all-residential project and the development will occur within one two-story building and all of the units are studios including 7 units that are accessible to persons with disabilities. Commercial General (CG) Zone District at 32 dwelling units/acre.	Unknown	Unknown
P-19	Majestic Palms Apartments	51203108	42.18	4879 N Bryan Ave	P22-03852 B23-09554, B23-09692 to B23-09702, B23-10443, and B23-09554	This project was submitted for entitlement review on October 4, 2022, and received approval on January 8, .2024. The project was submitted for building plan check review on August 7, 2023, and as of June 2024, is still under review.	0	0	0	71	70	**141**	141 market rate rental one-, two-, and three-bedroom apartment units and one manager's unit. Regional Mixed Use (RMX) Zone District at 18 dwelling units/acre.	Completion: Summer 2026 Barriers identified by applicant: Accela more challenging than previous in-person processing	$2,000-$3,500
P-20	Avalon Commons Buildings 1 thru 5	40407150T	55.09	7521 N Chestnut Ave	P21-02506, B22-18206, B22-18342 to B22-18345	This project was approved and entitled on June 25, 2022. Then received building permits on October 18, 2023, and construction is underway as of February 2024.	0	34	25	46	0	**105**	This is an affordable multi-family housing project by Fresno Housing utilizing LIHTC and NPLH funding and exercising an affordable density bonus to get a 33% increase in total allowable unit. This project includes twelve one- and two-story buildings with 105 total units and a unit breakdown of 16 one-bedroom, 53 two-bedroom, and 36 three-bedroom units. This project was entitled in June 2021 under application P21-02506 and 60 of the units are currently under construction. The other 45 units have not been submitted for building permit plan review yet. Residential Single-family, Medium Density (RS-5) Zone District at 15 dwelling units/acre.	Completion: Fall 2024	7521 N Chestnut Ave

ID	Project Name	APN(s)	Census Tract	Address	Tracking ID	Project Status	Units by Income Level					Total Units	Project Description	Phasing, Anticipated Build-out, and Known Barriers to Development	Projected Rents for Market Rate Projects
							ELI	VLI	LI	M	AM				
P-21	Parkside Inn	44927056T	20	1429 W Olive Ave	P22-04444	This project was submitted for entitlement review on November 17, 2022, and approved on June 7, 2023.	15	6	17	1	0	**39**	Deed-restricted lower -income housing development by the Fresno Housing Authority. Hotel Conversion (27 units) and 12 new multi-family units. Specific levels of affordability are undetermined at the moment but will be affordable to lower-income. Rental studio, one-, two-, three-bedroom, and special needs apartment units and one manager's unit. Neighborhood Mixed Use (NMX) Zone District at 22 dwelling units/acre.	Completion: Spring 2026 Phase 1: 27 units, hope to start next spring Phase 2 16+units, hope to apply next year Barriers identified by applicant: Competitive funding; Accela more challenging than previous in-person processing	N/A
P-22	Self-Help Enterprises 6 SFRs	47716201T	9.02	2304 S Walnut Ave	P22-00670, B24-01581, B24-01583, B24-01584, B24-01586, B24-01590, and B24-01591	This project was approved and received entitlements on July 8, 2022. Then submitted for building plan check review on February 8, 2024, and is still under review.	0	0	6	0	0	**6**	Custom affordable deed-restricted single family residential (6 units) by Self Help Enterprises. Deed-restricted at 50% to 80% AMI, HOME and PLHA 30-year Declaration of Restrictions. Residential Single-family, Medium Density (RS-5) Zone District at 8 dwelling units/acre.	No planned phasing Expected completion date mid Jan 2025 Barriers, coordination with utilities, and some problems with private owner	This property will not have rents, it will be homeownership
P-23	San Joaquin Hotel	42504139	46.02	1309 W Shaw Ave	N/A	This project was submitted for entitlement review on December 20, 2022.	0	59	0	0	0	**59**	Hotel conversion to dwelling units (69 units total, 24 units for chronic homelessness and 35 for youth). Funded by Project Homekey. Phase 1 - 10 ground floor units have been entitled and completed. Remaining 59 units have not yet been completed. Commercial Mixed Use (CMX) Zone District at 40 dwelling units/acre.	Unknown	N/A
P-24	Self-Help Enterprises 11 SFRs	47714530T 47714531T 47714532T 47714533T 47714542T 47714544T 47714545T	9.02	84 E Geary St	P22-00671, B23-13767, B23-13774, B23-13775, B23-13777, B23-13779 to B23-13781, and B23-13783 to B23-13786	This project was approved and received entitlements on June 20, 2022. Then submitted for building plan check review on September 7, 2023..	0	0	11	0	0	**11**	Custom affordable deed-restricted single family residential (11 units) by Self Help Enterprises. Deed-restricted at 50% to 80% AMI, HOME and PLHA 30-year Declaration of Restrictions. Residential Single-family, Medium Density (RS-5) Zone District at 2.5 dwelling units/acre.	No phasing Expected completion date is Sept 2024 Barriers, coordination with utilities, and some problems with private owner	This property will not have rents, it will be homeownership
P-25	Audubon Park Apartments	40257008 40257009	44.11	555 W Audubon Dr	P19-04137	This project was approved and received entitlements on February 12, 2020.	0	0	0	0	63	**63**	Expansion of existing Audubon Park Apartments to add an additional 63 units of market rate rental studio, one-, two-bedroom apartment units with underground parking garage. Residential Multi-family, High Density (RM-3) Zone District at 19 dwelling units/acre.	Completion: Summer 2026 Barriers identified by applicant: Accela more challenging than previous in-person processing	$2,500-3,500; luxury multifamily, above moderate-income
P-26	Sarah's Court	31310124	14.11	200 N Salma Ave	B22-09529 P21-00561	This two-phase 240 affordable unit project was approved and received entitlements on August 30, 2022. Building Permits were issued on January 5, 2023, for 120 units under Phase 1 and construction is underway. The 120 units for Phase 2 have not been submitted for building permit plan check review.	0	0	120	0	0	**120**	Part of Fancher Creek Town Center. 240 multi-family deed-restricted affordable units, with Phase 1 (120 units being built by June 2024) and Phase 2 (120 units). Funded by LIHTC and HOME funds. Commercial Regional (CR) Zone District at 46 dwelling units/acre.	Phase 1 anticipated opening in Fall 2024 Phase 2: potential barrier is being able to receive LIHTC	N/A

ID	Project Name	APN(s)	Census Tract	Address	Tracking ID	Project Status	Units by Income Level					Total Units	Project Description	Phasing, Anticipated Build-out, and Known Barriers to Development	Projected Rents for Market Rate Projects
							ELI	VLI	LI	M	AM				
P-27	Ambassador Hotel	44923111	20	1804 W Olive Ave	B22-12938	Under the Emergency Housing Program this project was not required to be entitled. This project did receive building permits on August 16, 2023, and completed construction on October 12, 2023.	52	0	0	0	0	**52**	Conversion of two-story hotel into 52 affordable housing units including 8 accessible to persons with disabilities. All the units are studios. The project is Homekey funded with a 55-year Declaration of Restrictions. Neighborhood Mixed Use (NMX) Zone District at 50 dwelling units/acre.	Project is completed and occupied	N/A
P-28	Willow Apartments	40409046 and 40409047	55.09	7345 and 7355 N Willow Ave	B20-01446 to B20-01461	This three-phase multi-family residential project was approved for entitlement on May 19, 2008. The first two phases of this project received building permits on August 3, 2023, and construction is underway.	0	0	0	132	133	**265**	This is a 265 unit multi-family residential apartment complex with 24 two-story apartment buildings consisting of a mix of one-, two-, and three-bedroom. The three-story community center includes one manager's unit. This is a three phase project and the 176 units currently under construction represent 16 buildings and a clubhouse in the first two phases. Phase 3 has not been issued building permits. Residential Multi-family, Medium High Density (RM-1) zoning at 16 du/acre.	Multiple phases with phase 1 under construction and estimated to be complete in 14 months; phase 2 estimated to be complete in about 3 years; third phase is unknown at this time.	Unknown
P-29	Heritage Estates	47706004T	9.02	123 -139 E Pitt Ave, 122 – 141 E Belgravia, 121 – 148 E Tower Ave, 2305 - 2389 S Modoc St	P23-02692	All residential building templates were approved in May 2024. All 33 SFRs have received at-risk foundation only permits in July 2024, which means they can begin laying underground utilities and concrete foundations prior to receiving building permits.	0	0	33	0	0	**33**	This is an affordable homeownership development project by Fresno Housing. The project will consist of 33 single family homes, with the first homes estimated to be available by August 2025.	Groundbreaking happened September 2024.	This property will not have rents, it will be homeownership
Total							**152**	**140**	**317**	**1,041**	**1,107**	**2,757**			

APN = Accessor's Parcel Number, N/A = Not Available, DU = Dwelling Units, ELI = Extremely-low Income, VLI = Very-low Income, LI = Low-income, M = Moderate-income, AM = Above-moderate Income

Source: City of Fresno and Ascent, September 2024.

Table 1E-2.4: Vacant Land with Final Subdivision Maps Under Construction, City of Fresno, June 2023

Map Number	Recorded Year	Number of Single-Family Lots	Number of Permits Issued Prior to June 18, 2023	Number of Unbuilt Single Family Lots Counted in 6th Cycle	Income Category
5388	2023	42	16	26	Above Moderate
6139	2017	102	92	10	Above Moderate
6162	2021	83	26	57	Above Moderate
6201	2022	97	0	97	Above Moderate
6224	2021	349	86	263	Above Moderate
6238	2023	47	34	13	Above Moderate
6258	2021	98	87	11	Above Moderate
6285	2021	181	165	16	Above Moderate
6295	2021	110	71	39	Above Moderate
6299	2023	218	56	162	Above Moderate
6308	2023	209	34	175	Above Moderate
6336	2022	72	26	46	Above Moderate
6400	2023	72	20	52	Above Moderate
	Total	**1,680**	**713**	**967**	

Source: City of Fresno, June 2023.

Sites Inventory

State law requires that jurisdictions demonstrate in the Housing Element that the land inventory is adequate to accommodate that jurisdiction's share of the region's projected growth (RHNA).

Fresno has many vacant residential development opportunities along with underutilized non-vacant sites with redevelopment potential with sufficient capacity to meet and exceed the identified housing need for 2023-2031. The detailed sites inventory is contained in Section 1E-7 (Detailed Sites Inventory Tables), **Table 1E-7.1** and **Table 1E-7.2**. The opportunities shown in this inventory consist of vacant and non-vacant land in residential, mixed-use sites, and commercial districts that allow residential development. No identified constraints on these sites would prevent development or reuse during the Housing Element period.

Methodology

The following is a description of the methodology used to estimate housing unit capacity on vacant and non-vacant sites within Fresno and to classify sites by income level.

Income Assumptions

Density can be a critical factor in the development of affordable lower-income housing. Higher density development can lower per-unit land cost and facilitate construction in an economy of scale. The following describes the assumptions used to determine the inventoried income categories and the realistic buildout capacity for each site.

Lower-Income Sites

State law (Government Code Section 65583.2(c)(3)) establishes a "default density standard" of 30 units per acre for Fresno, which is categorized as a metropolitan jurisdiction because the population exceeds 100,000. This is the density that is "deemed appropriate" in State law to accommodate the City's lower-income RHNA. Most zoning districts in Fresno allow for this density; however, many of these zones use height to regulate the maximum building envelope rather than a residential density standard.

To accelerate housing production in infill areas the City adopted amendments to remove maximum density limitations in the Mixed Use Districts, to modify the restriction that prohibits ground floor residential uses in mixed-use, and to allow ministerial approval of multi-family residential uses within the Priority Areas for Development. The City performed an analysis to determine the following maximum achievable densities under the height, setback, and other development standards for the mixed use zoning districts:

- CMS (Commercial Main Street): 48 units per acre
- CMX (Corridor/Center Mixed Use): 75 units per acre
- CR (Commercial – Regional): 80 units per acre
- NMX (Neighborhood Mixed Use): 64 units per acre
- RMX (Regional Mixed Use): 90 units per acre

The Downtown Development Code establishes unlimited densities for the three Downtown Districts (Downtown Core (DTC), Downtown General (DTG), and Downtown Neighborhood (DTN)) as well as the Apartment House (AH) Overlay zone. To determine achievable densities in the Downtown, the City analyzed development trends of residential projects since 2008. The average number of units per floor for projects in Downtown Fresno was 18.9 units per floor. Multiplying that average by the allowed number of stories for Downtown Districts and the AH overlay, the City determined the following potential densities for these zones:

- DTC (Downtown Core): 283 units per acre (15 stories)
- DTG (Downtown General): 189 units per acre (10 stories)
- DTN (Downtown Neighborhood): 113 units per acre (6 stories)
- DTN-AH (Apartment House) Overlay: 57 units per acre (3 stories)

Based on the density analysis of mixed use and Downtown Districts, it was determined that the following zoning districts in Fresno allow at least 30 units per acre:

- RM-2 (Residential Multi-Family, Urban Neighborhood): 16-30 units per acre
- RM-3 (Residential Multi-Family, High Density): 30-45 units per acre
- DTC (Downtown Core): No density or Floor Area Ratio (FAR) limits, 190 foot height limit
- DTG (Downtown General): No density or FAR limits, 140 foot height limit
- DTN (Downtown Neighborhood): No density or FAR limits, 90 foot height limit
- AH (Apartment House) Overlay: No density or FAR limits, 35 foot height limit
- NMX (Neighborhood Mixed Use): min. density 12 units/acre, no max. density
- CMX (Corridor/Center Mixed Use): min. density 16 units/acre, no max. density (note: General Plan requires a minimum 40 percent residential use)
- RMX (Regional Mixed Use): min. density 30 units/acre, no max. density (note: General Plan requires a minimum 30 percent residential use)
- CMS (Commercial - Main Street): no density limit
- CR (Commercial – Regional): no density limit

Sites larger than 0.5 acres and within a zoning district listed above were included in the inventory as meeting the lower-income RHNA, except as described below.

Moderate-Income Sites

Zoning districts that allow multi-family residential at densities less than 30 units per acre are assumed to accommodate the moderate-income RHNA. In Fresno, this includes two zoning districts:

- RM-1 (Residential Multi-family, Medium High Density), which allows for multi-family at a density of 12-16 units per acre; and
- RM-MH (Mobile Home Park), which allows for the development of mobile home parks at a density of 12-16 units per acre.

Above Moderate-Income Sites

Zoning districts that allow primarily single-family housing are counted in the above moderate-income inventory. This includes the following zoning districts:

- RE (Residential Estate): up to 0.15 units/acre
- RS-1 (Residential Single-family, Extremely Low Density): up to 1.0 unit/acre
- RS-2 (Residential Single-family, Very Low Density): up to 2.5 units/acre

- RS-3 (Residential Single-family, Low Density): up to 3.5 units/acre
- RS-4 (Residential Single-family, Medium Low Density): 3.5-6.0 units/acre
- RS-5 (Residential Single-family, Medium Density): 5.0-12.0 units/acre

In addition, sites smaller than 0.5 acres with the zoning districts listed above as meeting the "default density" for lower-income sites are counted in the above moderate-income sites inventory, assuming that these sites are too small to accommodate subsidized lower-income developments.

While the inventory assumes single family homes on these sites, it is important to note that many of these zones allow a broader variety of housing types including duplexes, Senate Bill (SB) 9 lot splits, and Accessory Dwelling Units (ADUs).

Realistic Capacity

Government Code Section 65583.2(c) requires, as part of the analysis of available sites, a local government to calculate the projected residential development capacity of the sites identified in the housing element that can realistically be achieved. The housing element must describe the methodology used to make this calculation. Jurisdictions have two options to make this calculation: 1) use the minimum densities, or 2) use a realistic density based on typical densities of other residential developments at similar affordability levels and other adjustment factors to account for land use controls and infrastructure availability.

Capacity Assumptions on Residential Districts

In order to develop assumptions of realistic density for each of the zones where housing is an allowed use, City staff reviewed the density of recently approved and built residential projects from 2018 to 2023. **Table 1E-2.5** outlines density assumptions by zone. A separate methodology, which is described below, was used to determine realistic density assumptions for the mixed use zones to reflect the recent (2022) amendments to remove maximum density limitations.

The realistic residential development potential of vacant and non-vacant sites has been assumed to be between 60 to 95 percent of the maximum permitted density, depending on the zone, for Residential Single Family (RS) and Residential Multi Family (RM) Districts. As shown below in **Table 1E-2.5**, project examples from 2018-2023 in the RS and RM Districts varied in range, sometimes exceeding the maximum allowed densities and other times not meeting the minimum. There is one site in the vacant inventory that is zoned Mobile Home Park (RM-MH). Because there are not any recent examples of mobile home park developments, the realistic density of 8.5 units per acre was set based on the average density of surrounding mobile home parks.

Table 1E-2.5: Density Assumptions for Residential Districts

Zone District	Min. Density DU/ Acre	Max Density DU/ Acre	Project Examples (2018-2023)				Density Assumptions		
			Number	DU/Acre Average	Actual Percent of Max	DU/Acre Range	Assumed Percent of Max	Realistic Density DU/Acre	Affordability Level
Residential Single Family (RS) Districts									
RE	N/A	0.2	N/A	N/A	N/A	N/A	80%	0.1	Above Moderate
RS-1	N/A	1.0	N/A	N/A	N/A	N/A	80%	0.8	Above Moderate
RS-2	N/A	2.5	N/A	N/A	N/A	N/A	80%	2	Above Moderate
RS-3	N/A	3.5	16	3.3	95%	2-7	95%	3.3	Above Moderate
RS-4	N/A	6.0	39	5.0	80%	3-9	80%	4.8	Above Moderate
RS-5	N/A	12.0	99	8.3	68%	3-26	70%	8.4	Above Moderate
Residential Multi-Family (RM) Districts									
RM-1	12	16.0	25	13.9	87%	4-21	85%	13.6	Moderate
RM-2	16	30.0	16	17.8	59%	14-30	60%	18	Very Low/Low (> 0.5 acre), Moderate (< 0.5 acre)
RM-3	30	45.0	2	34.5	77%	25-44	75%	33.8	Very Low/Low (> 0.5 acre), Moderate (< 0.5 acre)
Other									
RM-MH	12	16.0	0	N/A	N/A	N/A	N/A	8.5	Moderate

N/A = Not Applicable, RE = Residential Estate, RS-1 = Residential Single-Family, Extremely Low Density, RS-2 = Residential Single-family, Very Low Density, RS-3 = Residential Single-family, Low Density, RS-4 = Residential Single-family, Medium Low Density, RS-5 = Residential Single-family, Medium Density, RM-1 = Residential Multi-family, Medium High Density, RM-2 = Residential Multi-Family, Urban Neighborhood, RM-3 = Residential Multi-Family, High Density, RM-MH = Mobile Home Park

Source: City of Fresno and Ascent, June 2023.

Capacity Assumptions on Mixed Use Sites

To accelerate housing production in infill areas, the City adopted zoning amendments to remove maximum density limitations in the Mixed Use Districts, modify the restriction that prohibits ground floor residential uses in mixed-use, and allow ministerial approval of multi-family residential uses within the Priority Areas for Development. The City performed an analysis to determine the following maximum achievable densities under the height, setback, and other development standards for the mixed use zoning districts.

Commercial and Mixed Use Zones

Table 1E-2.6 identifies the five mixed-use and commercial zones included in the inventory that allow residential development. The three mixed use zones (NMX, CMX, RMX) require residential development and do not allow 100 percent non-residential developments except on lots smaller than 20,000 square feet or more than 1,000 feet from a planned or existing bus rapid transit (BRT) route. The CMS and CR zones allow but do not require residential to be included in all developments. These zones allow both standalone residential and standalone commercial developments.

However, all five zones have some level of restrictions on ground floor residential uses in order to activate the sidewalk. In the MX zones, residential is not allowed on the ground floor within 200 feet of an intersection of two or more major streets with the exception of main building entrances and active community spaces. In the CMS and CR zones, ground floor residential is not permitted along arterials or collectors. In addition, there are requirements for active ground floor uses for developments close to transit stations in all five zones. Within 100 feet in each direction of an existing or planned BRT station, no less than 60 percent of the building frontage along public streets must be occupied by food and beverage sales, entertainment and recreation, general personal services, artist's studios, eating and drinking establishments, personal services, general retail, or convenience retail uses. Other high-activity uses that typically operate at night and on weekends may be approved at the discretion of the Review Authority.

As described above, in 2022 the City modified standards in the commercial and mixed use zones to facilitate higher residential densities. One of the key changes was to remove the maximum residential density and instead rely on height. As part of this effort, the City created conceptual sites plans to determine reasonable densities under the Citywide Development Code. The Citywide Development Code Section 15-309 defines FAR as the measure of intensity of non-residential development, so it was not applied to Mixed Use Development. The conceptual plans reflected required commercial components. The anticipated densities were significantly higher than what had been previously allowed in the commercial and mixed use zones. Because the zoning amendment is so recent, there are only a few projects that have been submitted or approved under the new standards. However, given the significant increase in allowed density and the minimum residential requirements for several of the mixed use zones (described above), it is realistic to assume development in these mixed use zones will be at much higher densities.

Looking at development trends on mixed use zoned sites over the past five years (i.e., since 2018), 48 percent of developments have been commercial (including 100 percent commercial developments and commercial that is part of a mixed use project) and 52 percent have been residential. The sites inventory applies an assumption of 50 percent of the identified reasonable density in commercial and mixed use zones to account for commercial development in mixed use zones, as shown in **Table 1E-2.6.** Mixed-use sites account for 29 percent of all residential capacity identified, including 52 percent of lower-income housing capacity.

Table 1E-2.6: Density Assumptions for Mixed Use Zones

Zone District	Zone District Name	Min. Density (DU/ Acre)	Calculated "Reasonable" Density (DU/ Acre)	Density Assumptions		Allowed Land Uses
				Assumed Percent Residential	Realistic Density (DU/Acre)	
NMX	Neighborhood Mixed Use	12	64	50%	32.0	Horizontal or vertical mixed use, standalone residential, standalone non-residential is only permitted on lots smaller than 20,000 square feet or further than 1,000 feet from a planned or existing BRT route
CMX	Corridor/Center Mixed Use	16	75	50%	37.5	
RMX	Regional Mixed Use	30	90	50%	45.0	
CMS	Commercial – Main Street	N/A	48	50%	24.0	Vertical or horizontal mixed use, standalone residential, standalone commercial
CR	Commercial – Regional	N/A	80	50%	40.0	

Source: City of Fresno and Ascent, June 2023.

Recent Project Examples in Mixed Use Zones

Recent development trends in Fresno reflect a high demand for residential development, which has resulted in developments that emphasize residential development over exclusively non-residential developments. Most mixed-use projects that have been approved or are in the development process are primarily residential, with just enough ground-floor retail to occupy the ground floor. Even with the provision of ground-floor commercial space, most of these developments were able to achieve or exceed the previously established maximum allowable residential densities, further demonstrating the strength of residential development over commercial development in Fresno. Staff anticipates that this trend will continue, and land zoned for mixed use will achieve residential densities at or above the previously maximum allowed.

The following are examples of recent projects in mixed use zones that are at various stages.

Hageman Apartments

The Hageman Apartments is zoned CMS with a density of 42 dwelling units per acre. This project is located at 1010 E Home Avenue (APN 451-122-24), which is a 0.24 acre site in the Tower District near Fresno City College. It will be a three-story vertical mixed-use development with 10 units of affordable housing; 91 percent residential and 6 percent retail/office. The project received approval for entitlement in 2018 and is in building permit review as of September 2024.



The Hardison

The Hardison is zoned NMX with a density of 106 dwelling units per acre. It is located at 2049 Broadway Street (APN 459-296-03), which is 0.17 acres and located in Downtown Fresno. It will be a four-story vertical mixed-use site with 26 units of market-rate housing; 75 percent residential and 25 percent retail/office. The project received entitlement approval in 2020 and is in building permit review as of September 2024.



Brandhaven Senior Apartments

The Brandhaven Hageman Apartments are zoned CR with a density of 118 dwelling units per acre. They are located at 150 N Salma Avenue (APNs 313-920-03, 05, 06, and 07), which is a 1.52-acre site in southeast Fresno. It is a three story 100 percent residential development with 178 affordable units and two manager units. The project received approval for entitlement in 2020 and completed construction in 2023.



Downtown Zoning Districts

Downtown sites account for 11 percent of all residential capacity identified, including16 percent of the lower-income housing capacity. As described above, the Zoning Code establishes unlimited densities for the three Downtown Districts (Downtown Core (DTC), Downtown General (DTG), and Downtown Neighborhood (DTN)) as well as the Apartment House (-AH) Overlay zone. To determine achievable densities in the Downtown, the City analyzed development trends of residential projects since 2008. The average number of units per floor for projects in Downtown Fresno was 18.9 units per floor. Multiplying that average by the allowed number of stories for Downtown Districts, the City determined the following potential densities for these zones:

- DTC (Downtown Core): 283 units per acre (Maximum 15 stories)
- DTG (Downtown General): 189 units per acre (Maximum 10 stories)
- DTN (Downtown Neighborhood): 113 units per acre (Maximum 6 stories)
- DTN-AH (Apartment House) Overlay: 57 units per acre (Maximum 3 stories)

However, recent development projects have not been built at the maximum heights allowed in the downtown zones. Instead, developments in the DTC zone ranged from 4-11 stories; developments in the DTN zone ranged from 2-4 stories; and developments in the DTN-AH zone were typically 2 stories. Looking at actual built and approved projects in the downtown zones during the 2018-2023 timeframe shows densities within the range of 65-247 units per acre, depending on the zone. The realistic densities used in the sites inventory analysis are based on median densities for projects approved in 2018-2023 unless otherwise noted in **Table 1E-2.7**.

Table 1E-2.7: Density Assumptions for Downtown Districts

Zone District	Zone District Name	Maximum Number of Stories	Project Examples (2018-2023)				Realistic Density DU/Acre
			Number	DU/Acre Average	DU/Acre Median	DU/Acre Range	
Downtown Districts							
DTC	Downtown Core	15	5	136	90	81-247	90
DTG*	Downtown General	10	N/A	N/A	N/A	N/A	83
DTN	Downtown Neighborhood	6	6	72	76	36-94	76
DTN-AH**	Apartment House Overlay	3	3	32	N/A	17-47	32

**There were no projects in the DTG zone. The realistic density is calculated as an average between the DTC and DTN realistic densities since the DTG zone allows 10 stories of development, which is halfway between the 15 allowed in the DTC and the 6 allowed in the DNT zone.*

***There were no projects in the DTN-AH zone during the 2018-2020 timeframe. The density analysis is based on development projects from 2008-2013 as described in the previous housing element.*

Source: City of Fresno and Ascent, June 2024.

Recent Project Examples in Downtown Zones

The following are examples of recent developments in the Downtown zones. Both of these projects are at densities that greatly exceed the realistic densities used in the sites inventory calculations.

The Monarch @ Chinatown

The Monarch @ Chinatown is zoned DTN with a density of 106 dwelling units per acre. It is located at 1101 F Street (APN 467-065-15), which is 0.60 acres. It is a four-story vertical mixed-use project with 52 affordable housing units; 93 percent residential and 7 percent retail. The project received approval for entitlement in 2020 and completed construction in 2023.



The Park

The Park is zoned DTC with a density of 206 dwelling units to the acre. It is located at 829 Fulton Street, APN 468-282-05T, which is 0.78 acres and located in Downtown Fresno. It will be a six-story vertical mixed-use project with 161 housing units; 83% residential and 17% retail/office. The project received approval for entitlement in August 2024 and has not submitted for building permits yet.





Non-Vacant Sites

State law allows jurisdictions to rely on non-vacant and underutilized sites to accommodate the RHNA. However, non-vacant sites can present challenges for residential redevelopment and must therefore be analyzed closely to determine suitability. Jurisdictions must consider the extent to which existing uses may constitute an impediment to additional residential development, past experiences converting existing uses to higher density residential development, lease or contract requirements limiting residential redevelopment, development trends, market conditions, and regulatory or other incentives.

Jurisdictions that rely on non-vacant sites to accommodate more than 50 percent of the lower-income RHNA must include substantial evidence that the existing use on each non-vacant site in the inventory will not create an impediment to development during the planning period (Government Code Section 65583.2(g)(2)). After accounting for capacity in approved projects, on vacant sites, and projected accessory dwelling units (ADUs), the sites inventory relies on non-vacant sites to meet only 22 percent of the lower-income RHNA. The non-vacant sites included in this Housing Element sites inventory have been vetted through a site-by-site analysis to only include sites deemed to have a great potential for redevelopment during the planning period. The sites generally fall into five categories, which are described in more detail below.

A. Agricultural Uses Planned for Residential

There are several hundred acres of agricultural land, mostly on the periphery of city limits, that have been annexed into the city and zoned for residential development. Many of these sites have approved tentative subdivision maps and are planned for residential development in the short-term. Several of the sites are fallowed farm fields that are no longer actively farmed, and several are immediately adjacent to recently built residential subdivisions. The City reviewed the initial list of non-vacant sites with agricultural uses and removed sites with active agricultural uses, such as vineyards or orchards, or farms owned and operated by active farmers that seemed likely to continue operations during the planning period. Examples of non-vacant sites with agricultural uses are shown below (see Site Examples A1 and A2).

Site Example A1: Agricultural use with residential subdivision map





Site Example A2: Fallowed agricultural field





The following are five examples of residential development projects built in recent years on agricultural sites that are similar to the types of sites included in the sites inventory. Project Example A1 is a 240-unit affordable housing development called Sarah's Court that is being built as part of a multi-phase residential and commercial mixed use development, Fancher Creek Town Center. Project Example A2, The Row, is a market rate apartment project within a residential and commercial mixed use development built on agricultural land. Project Examples A3-A5 are examples of single family residential subdivisions built on agricultural land.

Project Example A1: Sarah's Court Affordable Housing on Agricultural Land

Project Description		Before	After
Affordable Apartments	Pipeline Project (under construction). Sarah's Court, APN 462420001 – 05 & 00F at 200 N Salma Ave. Phase I - 120 low income apartment units (under construction) and Phase II – 120 low income units in building permit review		

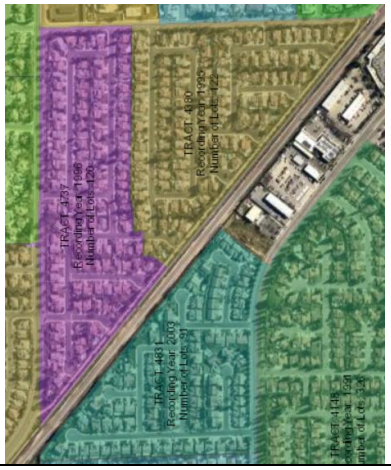
Project Example A2: Market Rate Apartments on Agricultural Land

Project Description		Before	After
Market Rate Apartments	The Row apartments and commercial, horizontal mixed use, 56801022 -30.		

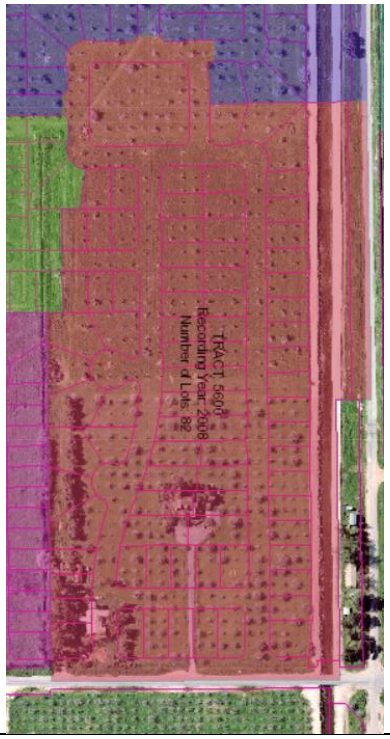
Project Example A3: Single Family Residential on Agricultural Land

Project Description		Before	After
Market Rate Single Family Residential	Single Family Residential subdivisions at northwest corner of Kings Canyon Rd and Fowler Ave (FM 5232, 5932, 6103, 6104, and 6291)		

Project Example A4: Single Family Residential on Agricultural Land

Project Description		Before	After
Market Rate Single Family Residential	Single Family Residential subdivisions at northwest corner of Kings Canyon Rd and Fowler Ave (FM 4380, 4582, 4737, and 4831)		

Project Example A5: Single Family Residential on Agricultural Land

Project Description		Before	After
Market Rate Single Family Residential	Single Family Residential subdivisions at southwest corner of Grantland Ave and Barstow Ave (FM 5600)		

B. Largely Vacant Residential Land

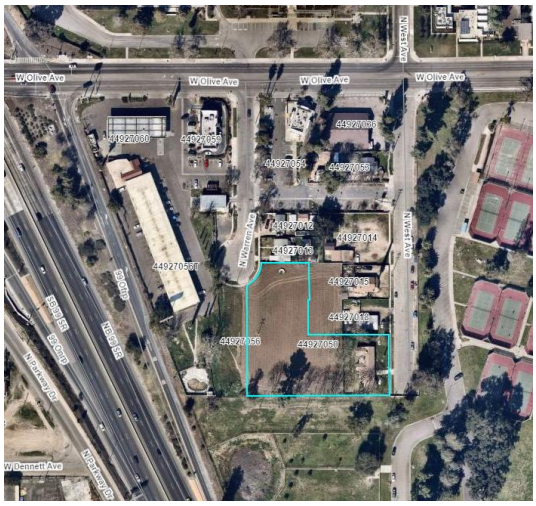
A few of the non-vacant sites are large and mostly vacant parcels with a single house that are planned for development at much higher densities. Many of these sites have a tentative subdivision map and are adjacent to other existing subdivisions. It is common in Fresno for the existing home to be demolished to make way for new residential subdivision development. The City estimated that about 25 percent of the time an existing home will remain and be identified as a remainder lot in the tract map. Examples of non-vacant sites in this category are shown below (see Site Examples B1 and B2).

Site Example B1: Largely vacant residential land with tentative subdivision map





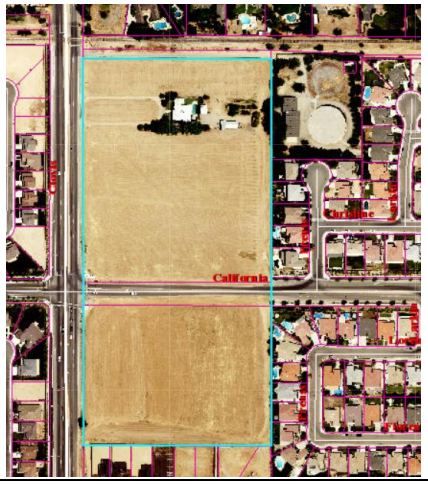
Site Example B2: Largely vacant residential land adjacent to other residential





The following are three examples of residential development projects built in recent years on rural residential sites that are similar to the types of sites included in the sites inventory. Project Example B1 is a 66-lot single family residential tentative subdivision map approved on a 15.60-acre rural residential parcel. Project Example B2, Avalon Commons, is a 105-unit mixed-income apartment project currently (2024) under construction on a 7.11-acre parcel that was previously used as a rural residence with a landscaping business. Project Example B3 is a 28-unit market rate apartment project called the Palms at Alluvial built on a 4.67-acre rural residential site. In all these examples the original residence was demolished (or will be demolished) and replaced by new single family or multifamily development.

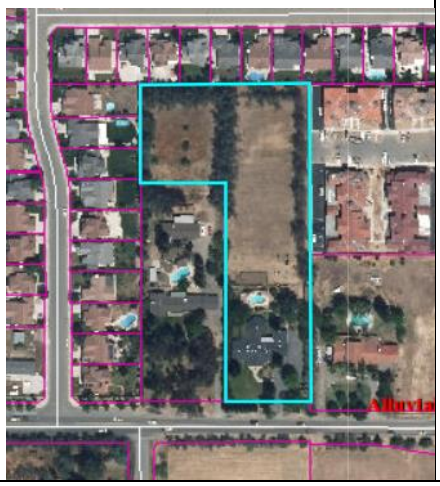
Project Example B1: Single Family Residential Tentative Map

Project Description		Before	After
Market Rate Single Family Residential	APN 31602201, 2149 S Clovis Ave, Approved Tentative Tract Map 5672		

Project Example B2: Avalon Commons Mixed Income Housing

Project Description		Before	After
Affordable and Market Rate Apartments	Pipeline Project (under construction). Avalon Commons, APN 40407150T at 7521 N Chestnut Ave. Phase I – 34 units very low income, 25 units low income, and 46 above moderate apartment units (under construction). Was a landscaping business.		

Project Example B3: The Palms at Alluvial Market Rate Apartments

Project Description		Before	After
Market Rate Apartments	Pipeline Project (under construction). The Palms at Alluvial, 28 market ate apartment units, APN 40450028 and 29 at 2806 E Alluvial Ave.		

C. Mostly Vacant Land With Paving or Minor Improvements

Several sites would be considered vacant land by most standards, but because there are minor improvements or remnant paving from prior uses, they are considered non-vacant by HCD standards. Examples of non-vacant sites in this category are shown below (see Site Examples C1 and C2).

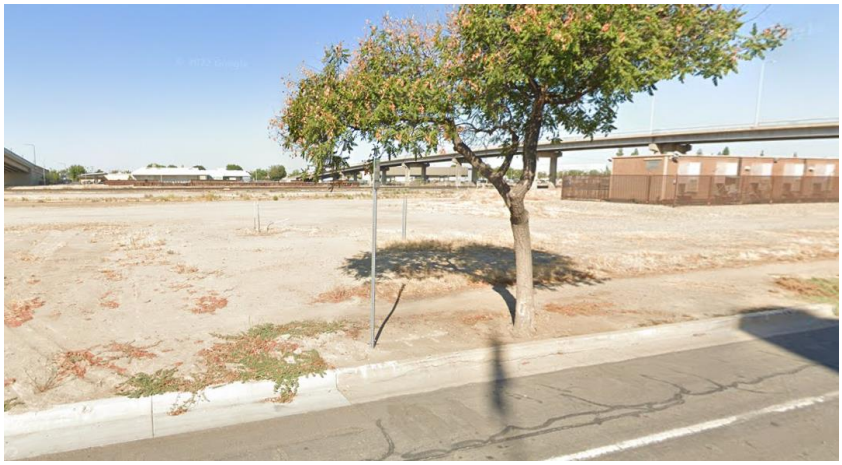
Site Example C1: Mostly vacant land with paving and vehicle access





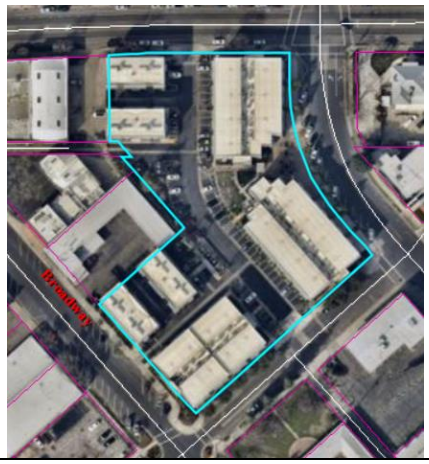
Site Example C2: Mostly vacant City-owned land with minor improvements



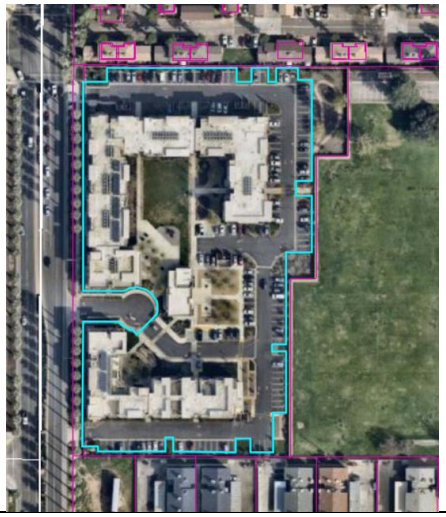


The following are three examples of residential development projects built in recent years on sites that were mostly vacant but had paving or other minor site improvements. Project Example C1, Iron Bird Lofts, is a 80-unit market rate apartment project built on a 2.17-acre site that had previously been two retail buildings which were demolished around 1994. Project Example C2, Las Palmas de Sal Gonzales is a 135-unit affordable housing development built on a 4.50-acre site that used to have an office facility that was demolished around 1997. Project Example C3 is a 5-unit single family project built on a 0.60-acre site that had previously been an office building.

Project Example C1: Iron Bird Lofts

Project Description		Before	After
Market Rate Apartments	Iron Bird Lofts (constructed) APN 46618245S, 101 Fulton St,		

Project Example C2: Las Palmas de Sal Gonzales

Project Description		Before	After
Affordable Apartments	Las Palmas De Sal Gonzales, APN 47216008, 5070 E Kings Canyon Rd, affordable housing		

Project Example C3: Single Family Infill Development

Project Description		Before	After
Market Rate Apartments	Single family homes, APN 46822320, 450 to 496 M St		

D. Existing Non-Residential Uses on Large Lots With Infill Potential

There are several non-vacant sites with existing non-residential uses that only cover a small portion of the site. In many cases the parcels are large enough for the existing uses to remain and the undeveloped portion of the site to be developed with housing at high densities allowed under the mixed use or downtown zoning districts (see Site Example D1 below). In other cases, the existing non-residential use is marginal and would likely be demolished and replaced with residential or mixed use (see Site Example D2 below).

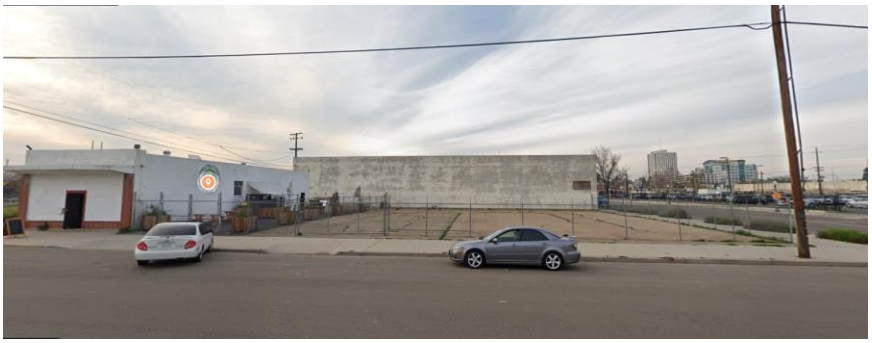
Site Example D1: Commercial strip center on large lot with infill potential





Site Example D2: Commercial building on corner lot with infill potential





The following are four examples of affordable housing developments built in recent years on underutilized infill sites. All of these developments are on sites that had existing commercial uses with large surface parking lots, similar to many of the nonvacant sites in the sites inventory. Project Example D1 is a planned senior affordable housing development that is proposed on a 6.22-acre City-owned site that used to be occupied by a commercial building. The existing building has been demolished to make way for the new housing development. Project Example D2, Clinton Family Apartments, is a 77-unit affordable housing development within a horizonal mixed use project that is currently (2024) under construction. The mixed-use project will replace an existing commercial strip center and several adjacent residences. The parcels were consolidated and the existing buildings were demolished. Project Example D3, The Link, is an 88-unit vertical mixed use affordable housing development constructed on a 2.91-acre site that had previously been occupied by a commercial business. The existing buildings were demolished. Project Example D4, The Arthur at Blackstone, is also an affordable housing development that replaced an existing commercial building and surface parking lot on five adjacent parcels with 41 units of affordable housing and new commercial in a mixed-use development.

Project Example D1: Planned Senior Affordable Housing

Project Description		Before	Now	Planned
Affordable Senior Apartments	Proposed affordable senior housing and senior center. APN 42625317, 4343 N Blackstone Ave. Horizontal mixed/use. Mostly Vacant City-Owned Property (Commercial Bldg/Parking Lot not in use, demolished)			

Project Example D2: Clinton Family Affordable Apartments

Project Description		Before	After
Affordable Apartments	Clinton Family Apartments (under construction), APN 44409220, 22, 26, 27 and 28, 1538 E Clinton Ave, 77 affordable units, horizontal mixed-use		

Project Example D3: The Link Affordable Apartments

Project Description		Before	After
Affordable Apartments	The Link (constructed), APN 45106416, 1661 E Home Ave, vertical mixed use with 88 affordable housing units on the upper floors and commercial/office uses on the first floor, and located on a corner with an existing commercial building.		

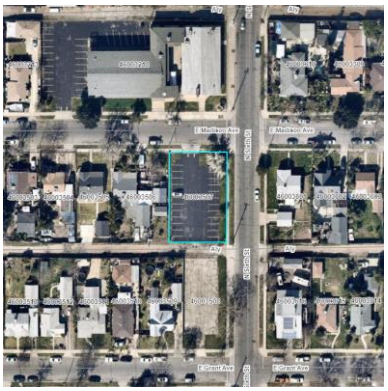
Project Example D4: The Arthur at Blackstone Affordable Housing

Project Description		Before	After
Affordable Apartments	The Arthur at Blackstone (under construction), APN 44310408T, 09T, 10, and 23, 3039 N Blackstone Ave, 41 affordable units/mixed use on a corner lot with an existing commercial building.		

E. Parking lots

The initial list of non-vacant sites included several dozen parking lots, mostly in the downtown area that were associated with existing commercial or office uses, places of assembly, or were standalone paid parking areas. While all of these parking lots provide opportunity for infill development downtown, the City was selective with which parking lots were included in the Housing Element inventory given the continued reliance on parking in the short-term. Only about half of the initial list of parking lots are included in the inventory. Parking lots that were significantly underutilized, deteriorating, or abandoned were included, as well as parking lots owned or leased by state or local jurisdictions that were not in heavy use. The City reviewed the publicly owned parking lots carefully for appropriateness and removed those not deemed available during the housing element planning period. Site Examples E1 and E2 below demonstrate typical sites that fit within this category.

Site Example E1: Overflow parking lot for adjacent church





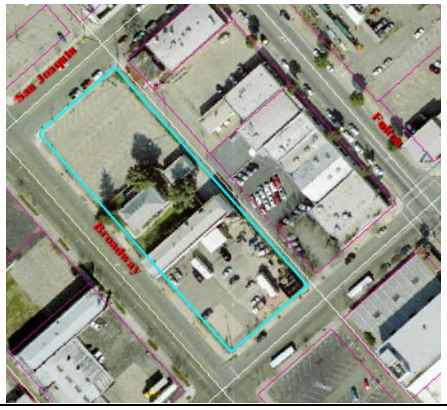
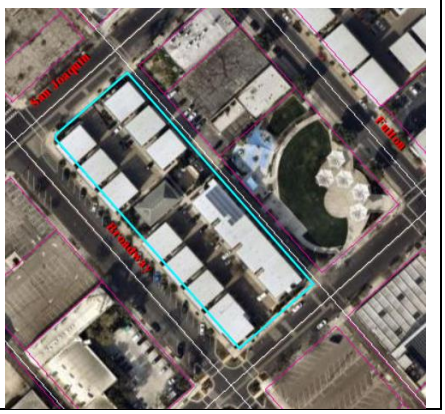
Site Example E2: Parking lot, not in use



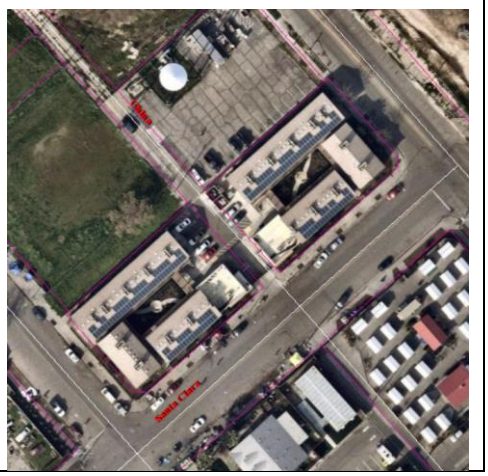


The following are three examples of affordable and market rate housing developments built in recent years on parking lots. Project Example E1, Brio on Broadway, is a vertical mixed use, market rate housing development built on a 1.34 acre commercial site that was mostly used as surface parking. Project Example E2, Renaissance at Santa Clara, is a 70-unit affordable housing development built on two adjacent parcels totaling 0.74 acres, one of which was an overflow parking lot for an adjacent commercial use. Project Example E3 is a 30-unit market rate apartment development on a 1.01 acre parking lot that was regularly used for a farmers market. Similar to most of the parking lot sites included in the sites inventory, all of these project examples are in Downtown Fresno. The sites are similar in size and location to the other parking lot sites included in the inventory.

Project Example E1: Brio on Broadway

Project Description		Before	After
Market Rate Apartments	Brio on Broadway, APN 46619328, 1636 Broadway Avenue, vertical mixed-use. Parking lot, not in use and commercial building on corner lot with infill potential.		

Project Example E2: Renaissance at Santa Clara

Project Description		Before	After
Affordable Apartments	Renaissance at Santa Clara, affordable apartment units, APN 46708231 and 32, 1505 Santa Clara Street.		

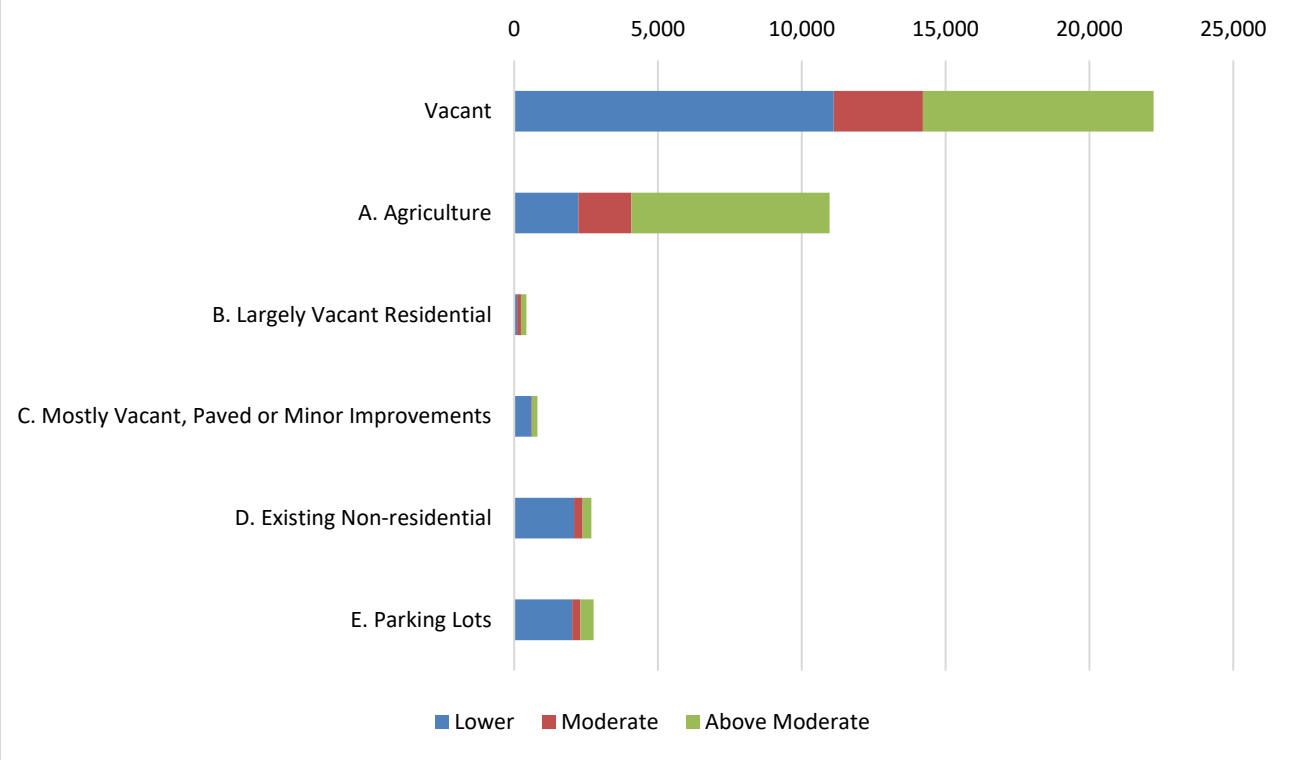
Project Example E3: 2: 1612 Fulton Street

Project Description		Before	After
Market Rate Apartments	1612 Fulton Street was a parking lot (with regular farmers market) and now market rate apartments. APN 46614416 Fulton Street.		

Summary of Non-Vacant Site Categories

Figure 1E-2.1 shows unit capacity by income level by type of site, including vacant and the five types of non-vacant sites: A) agricultural uses planned for residential, B) largely vacant residential land, C) mostly vacant land with paving or minor improvements, D) existing non-residential uses on large lots with infill potential, and E) parking lots. In all income levels, a majority of the housing capacity on sites in the inventory (not including pipeline project or ADUs) is on vacant sites (51 percent).

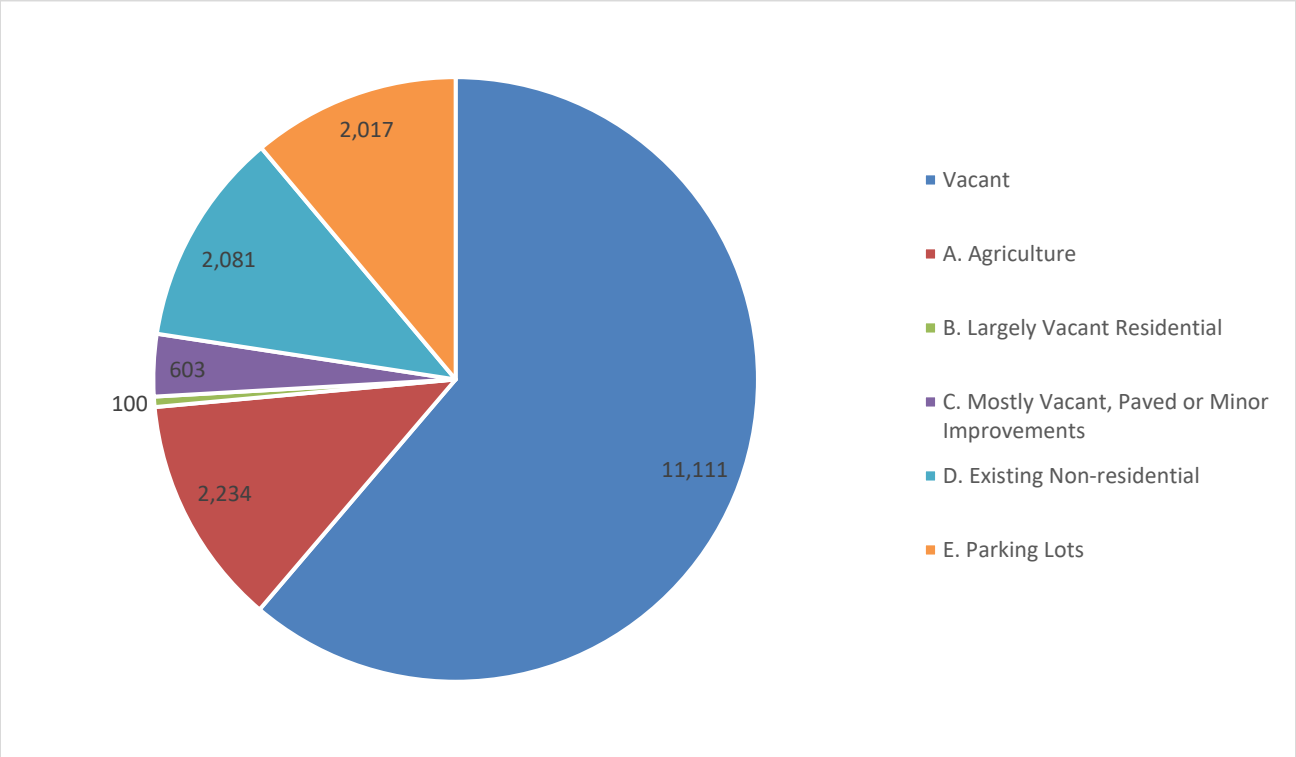
Figure 1E-2.1: Housing Capacity on Vacant and Non-Vacant Sites by Category, All Income Levels



Source: Ascent, September 2024.

Figure 1E-2.2 shows unit capacity of lower-income sites by type of site. A majority of the lower-income capacity is on vacant sites (59 percent). Of the non-vacant site categories, sites categorized as existing agriculture have the highest capacity of 2,234 lower-income units, and sites categorized as parking lots have the second highest capacity at 2,017 lower-income units.

Figure 1E-2.2: Lower-Income Site Capacity by Category



Source: Ascent, September 2024.

Publicly Owned Sites

There are about 50 sites in the sites inventory that are owned by various public agencies, including the City of Fresno, Fresno Housing Authority, Redevelopment Agency (now the Successor Agency), and the State of California. City staff has reviewed the list of publicly-owned sites carefully to understand ownership, whether the sites are already planned for housing development, any known barriers to development, and whether or not existing uses would need to be relocated. City staff removed more than 100 sites that are unlikely to develop for a variety of reasons, including site location within airport safety zones; sites planned for local or state infrastructure; sites with existing uses; awkwardly shaped and landlocked sites; and sites located adjacent to industrial uses. The remaining sites included in **Table 1E-2.9** represent publicly-owned and generally barrier-free sites with information about ownership and steps to development. This includes 8 sites that are non-vacant, including 3 lower-income sites located in the Downtown with total capacity for 1,146 units; and 3 above moderate income sites, also mostly smaller high-density zoned sites in the Downtown with total capacity for 72 units. All sites in the inventory are zoned to allow for residential development, and most are vacant, including 9 vacant lower-income sites with capacity for 896 units, 2 moderate-income sites with capacity for 59 units, and 31 above moderate-income sites with capacity for 267 units. This is in addition to the public sites identified in Table IE-2.8 that will be supported by improvements through the Downtown Fresno CIP.

Downtown Fresno Housing Projects Supported by Infill Infrastructure Grant

Several sites in the inventory have been identified as catalyst infill sites through the Infill Infrastructure Grant program. The City of Fresno was awarded $49 million through the State's Infill Infrastructure Grant Program – Catalytic Qualifying Infill Area (IIGC) in the 2022-2023 fiscal year. The primary goal of IIGC is to promote infill housing development by providing financial assistance for Capital Improvement Projects (CIPs) that are an integral part of, or necessary to facilitate the development of, Catalytic Qualifying Infill Areas. Under the program, grants are available as gap funding for infrastructure and other capital improvements necessary for specific residential or mixed-use infill development proposals.

The Downtown Fresno CIP supported by the IIGC grant includes sewer main replacements across multiple streets, a water project, site preparations, surface improvements, urban greening, installation of pedestrian lighting and push buttons, and ancillary works, and construction of a centralized off-site parking structure.

These improvements will allow for development of nine housing projects in Downtown Fresno, shown in Table 1E-2.8 and Figures 1E-2.3-1E-2.5. These projects encompass multiple sites that are under the ownership of the City of Fresno, the Fresno Housing Authority, and private entities. Of 863 total units anticipated to be developed, 457 are planned to be restricted to lower-income households, including 86 units for extremely low-income households, and the remaining 405 units are anticipated to be market rate, which are assumed to provide a 50/50 mix of moderate- and above moderate-income housing.

The grant does not provide funding for the housing developments themselves. However, each planned housing development has a plan to assure financial feasibility in time to meet required IIGC program milestones. These projects are currently in the design phase, and entitlements are expected to be requested by May 2025.

Table 1E-2.8: Downtown Fresno Infill Infrastructure Grant Sites

City Project ID	Site ID	APN	Ownership	Calculated Project Acres	Units by Income Level					Total Units	Site Description
					ELI	VLI	LI	M	AM		
HD1	1617	46615314	Private Owner	0.55		75				75	The Business Journal parking lot and right of way. HD1 is planned for student housing.
HD2	2473	46620656T	Housing Authority (HACF)	0.47		62				62	Parking lot for IRS building. Housing Authority owned site. Assumed that IRS building will remain. HD2 is planned for student housing.
HD3	1617	46615318	Private Owner	0.85	16	48				64	The Business Journal parking lot and right of way. HD3 is planned to receive Low Income Housing Tax Credits.
		ROW	City of Fresno								
HD4	2473	46620656T	Housing Authority (HACF)	0.47	15	40				55	Parking lot for IRS building. Housing Authority owned site. Assumed that IRS building will remain. HD4 is planned to receive Low Income Housing Tax Credits.
HD 5	1615	46620650T	City of Fresno	0.95				56	56	112	Parking lot across from IRS building in Downtown Fresno. On this site is proposed Market 1 by Fresno Housing with 112 market rate units. No development project submitted in Accela. There is currently a lease agreement in place for Fresno County. The most recent extension dated September 16, 2022 allowed a five-year extension expires December 31, 2027
		46620651T									

City Project ID	Site ID	APN	Ownership	Calculated Project Acres	Units by Income Level					Total Units	Site Description
					ELI	VLI	LI	M	AM		
HD 6	1618	46615315	Private Owner	0.91				50	50	100	Closed CVS parking lot and right of way. On this site is proposed Market 2.
		ROW	City of Fresno								
HD 7	2484	46704023ST	City of Fresno	2.32	26	74		97	97	294	Recently demolished building on the parcel owned by the City. The other parcel is privately-owned owned by Fresno Sports and Events Partners Inc
		46704020S	Private Owner								
HD 8	1525	46707115	Private Owner	0.78	21	50				71	Abandoned building
		46707120	Private Owner								
HD 9	2485	46707402	Private Owner	0.33	8	22				30	Existing commercial buildings
TOTAL				**7.63**	**86**	**371**	**0**	**203**	**203**	**863**	

Source: City of Fresno, September 2024.

Figure 1E-2.3: IIGC Sites HD1 - HD6 (Fulton Street)

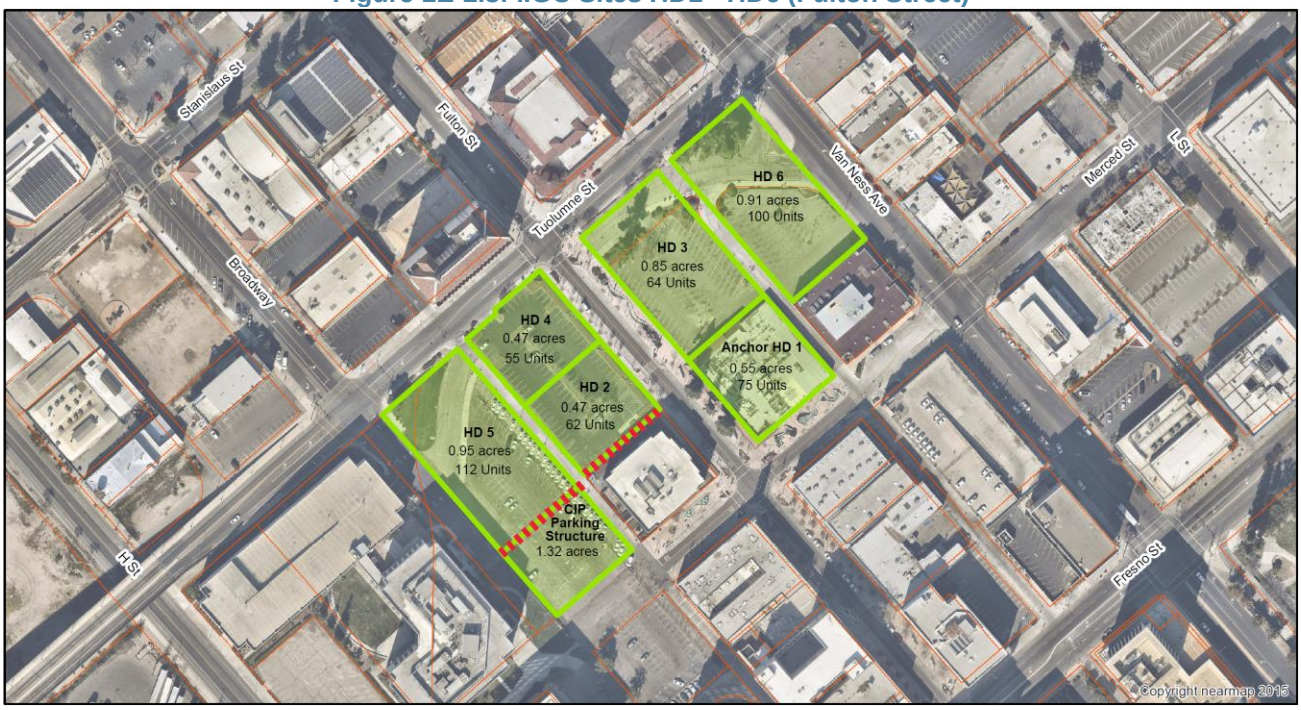


Figure 1E-2.4: IIGC Site HD7 (H Street Site in the South Stadium District)



Figure 1E-2.5: IIGC Sites HD8 - HD9 (Bing Kong and Peacock Sites in Chinatown)



Table 1E-2.9: Publicly-Owned Sites

Site ID	APN	Address	Zoning Code	Acres	Capacity (Units)			Ownership	Existing Use	Status and Remaining Steps
					Lower	Moderate	Above Moderate			
287	45603034T	5471 E Belmont Ave	RM-1	4.17		57		City of Fresno	Vacant; potential brownfield remediation	In September 2024, the City of Fresno will release a Request for Proposal (RFP) for the development of a vibrant community featuring 24 ARPA funded tiny homes on wheels and 26 ERF funded prefabricated micro homes, totaling 50 homes, all provided by the City. The development will include a community center, trail, or park. The submission deadline will be November 2024. Construction is anticipated to start in October 2025 and be completed in August 2026
304	31332107T		RS-4	0.45			2	City of Fresno	Vacant; near future retail center and BRT	
535	47005201T	3702 E Ventura St	NMX	3.40	109			City of Fresno	Vacant	
	47005202T	3754 E Ventura St	NMX							
	47005203T	3745 E El Monte Way	RS-5							
660	45205308	1556 E Olive Ave	CMS	0.17			4	Fresno Irrigation District	Vacant	
708	45021106T	929 N Fruit Ave	RS-5	0.21			2	City of Fresno	Vacant	As of September 2024, this property has not been declared a surplus site.
714	45015401T	761 W Hammond Ave	RM-1	0.16		2		State of California	Vacant	
987	51135201ST		RS-4	0.26			1	City of Fresno	Vacant	As of September 2024, this property has not been declared a surplus site.
1096	46404059T		RS-4	0.98			5	State of California	Vacant	City surplus site
1097	46404073T		RS-4	2.32			11	State of California	Vacant	City surplus site
1098	46431210T	1108 S Roeding Dr	RS-4	0.18			1	State of California	Vacant	City surplus site
1099	46431211T	1122 S Roeding Dr	RS-4	0.23			1	City of Fresno	Vacant	City surplus site
1100	46431212T	1136 S Roeding Dr	RS-4	0.24			1	City of Fresno	Vacant	City surplus site
1101	46431213T	1150 S West Ave	RS-4	0.46			2	City of Fresno	Vacant	City surplus site
1102	46431214T	1164 S West Ave	RS-4	0.39			2	City of Fresno	Vacant	City surplus site
1103	46427237T	1212 S West Ave	RS-4	1.05			5	City of Fresno	Vacant	City surplus site
1124	46410208T	2022 S West Ave	CMX	0.27			10	City of Fresno	Vacant	No known barriers to development. As of September 2024, this property has not been declared a surplus site.
1129	47704075ST	901 W Atchison Ct	RM-2	1.19	21			Housing Authority (HACF)	Vacant	Though the Housing Authority does not have development plans in place for these properties at this time. Lot acres have been reduced to usable portion of the site.
1130	47704075ST	901 W Atchison Ct	RM-2	4.91	88			Housing Authority (HACF)	Mostly vacant. Community garden on portion of site.	
1131	47704073T	555 W California Ave	CMX	8.06	302			Housing Authority (HACF)	Vacant	
1151	47712113T	33 E Atchison St	RS-5	0.21			2	Redevelopment Agency (RACF)	Vacant	
1153	47712105T		NMX	0.37			12	Redevelopment Agency (RACF)	Vacant; adjacent sites.	City surplus site adjacent to privately owned site 1152. Could be consolidated with nearby parcels to become a larger development opportunity.
	47712106T									

Site ID	APN	Address	Zoning Code	Acres	Capacity (Units)			Ownership	Existing Use	Status and Remaining Steps
					Lower	Moderate	Above Moderate			
1365	46724601T	731 E California Ave	NMX	2.92	93			Housing Authority (HACF) Redevelopment Agency (RACF)	Vacant	Site within the West Fresno CAN! Choice Neighborhood Initiative planned for new housing. Phase 1: 60 new affordable units in vertical mixed-use development slated for planning application submittal in Q4 of 2025; entitlement approval in Q2 of 2026, construction drawings in Q3 of 2027; and building permit issuance in Q2 of 2028.
	46724506T	537 Inyo St								
	46724505T	811 Waterman Ave								
	46724504T	813 Waterman Ave								
	46724503T									
	46724507T	661 E California Ave								
	46724511T	854 Klette Ave								
	46724509T									
	46724512T	864 Klette Ave								
	46724508T									
	46724510T	842 Klette Ave								
	46726201T									
	46726202T	851 Klette Ave								
	46726203T									
	46726204T	601 E California Ave								
1386	46718609T	1128 Collins Ave	RS-5	0.34			3	City of Fresno	Vacant	As of September 2024, this property has not been declared a surplus site.
1391	46715507T	1107 B St	RS-5	0.15			1	Redevelopment Agency (RACF)	Vacant parcel adjacent to 4 other vacant parcels.	City surplus site
1418	46517421T	1511 B St	RS-5	0.13			1	Redevelopment Agency (RACF)	Vacant	City surplus site
1419	46517422T	1515 B St	RS-5	0.13			1	Redevelopment Agency (RACF)	Vacant	City surplus site
1436	46411313T	130 W Lemon Ave	RS-5	0.14			1	Redevelopment Agency (RACF)	Vacant	City surplus site
1489	46706124T	1535 Fresno St	DTN	0.34			25	State of California	Vacant	Site is planned for transit-oriented development according to the High Speed Rail Station Master Plan. Status of State's plan for this site is unknown.
1490	46706123T		DTN	0.12			9	State of California	Vacant	
1492	46706211T	1526 Fresno St	DTN	0.26			20	State of California	Vacant	
1493	46706203T	1141 G St	DTN	0.26			20	State of California	Parking	
1523	46707410T	930 E St	DTN	0.35			26	City of Fresno	Parking Lot adjacent to privately-owned site 1522. Potential lot consolidation for a larger development opportunity	As of September 2024, this property has not been declared a surplus site.
1529	46707316T	730 F St	DTN	0.60	46			Redevelopment Agency (RACF)	Vacant	These properties were declared surplus in 2024 and RACF will follow the SLA guideline.
1530	46707305T	723 G St	DTN	0.09			7	Redevelopment Agency (RACF)	Vacant	These properties were declared surplus in 2024 and RACF will follow the SLA guideline.
1531	46707306T		DTN	0.18			13	Redevelopment Agency (RACF)	Vacant	These properties were declared surplus in 2024 and RACF will follow the SLA guideline.
1532	46708116T	655 G St	DTN	0.35			26	City of Fresno	Paved	In June 2024, this project was declared surplus.

Site ID	APN	Address	Zoning Code	Acres	Capacity (Units)			Ownership	Existing Use	Status and Remaining Steps
					Lower	Moderate	Above Moderate			
1562	46705013ST	555 H St	DTN	1.41	107			State of California	Vacant	Part of the property is abandoned for widening of Caesar Chavez underpass.
1573	46822212T	550 M St	DTG	0.30			25	Redevelopment Agency (RACF)	Vacant	As of September 2024, this property has not been declared a surplus site. The RACF is preparing to take this to the Fresno City Council for surplus site declaration consideration in 2025.
1574	46822215T	525 N St	DTG	0.60	50			Redevelopment Agency (RACF)	Vacant	As of September 2024, this property has not been declared a surplus site. The RACF is preparing to take this to the Fresno City Council for surplus site declaration consideration in 2025.
	46822216T	505 N St								
1576	46822301T	461 N St	DTG	0.43			36	Redevelopment Agency (RACF)	Vacant	As of September 2024, this property has not been declared a surplus site. The RACF is preparing to take this to the Fresno City Council for surplus site declaration consideration in 2025.
	46822302T	453 N St								
	46822319T	461 N St								
1579	46819534T	2402 Ventura St	DTG	0.73	61			Redevelopment Agency (RACF)	Only counting vacant part of parcel	As of September 2024, this property has not been declared a surplus site. The RACF is preparing to take this to the Fresno City Council for surplus site declaration consideration in 2025.
1580	46819213T	2504 Ventura St	DTG	0.95	79			Redevelopment Agency (RACF) owns two parcels four parcels are privately-owned as of September 2024	Vacant	As of September 2024, this property has not been declared a surplus site. The RACF is preparing to take this to the Fresno City Council for surplus site declaration consideration in 2025.
	46819214T	2518 Ventura St								
	46819236	530 O St								
	46819237	534 O St								
	46819222	2526 Ventura St								
	46819227	2534 Ventura St								
1606	46621522T	1822 Fresno St	DTC	2.78	250			State of California	Parking lot	State-owned site within the Station Master Plan Area ("Merchant's Lot). City will work with State to pursue development.
1607	46621426T		DTC	0.78	70			City of Fresno	Parking lot	Will serve as temporary parking until parking garage behind Hotel Fresno is built. Hotel Fresno has recently been converted to affordable housing. Permits are not being sold for this lot and parking is being deferred to this lot. As of September 2024, this property has not been declared a surplus site. These parcels are RDAF parcels to be disposed of going to the Hotel Fresno group
	46621427T									
1610	46703039ST	1705 Fresno St	DTC	2.25	202			State of California	Dairy Semi-truck parking	Will serve as temporary parking until parking garage behind Hotel Fresno is built. Hotel Fresno has recently been converted to affordable housing. Permits are not being sold for this lot and parking is being deferred to this lot.
1612	46504038ST	1301 H St	DTC	2.98	268			City of Fresno	Small building on site	This is a brownfield site acquired by the City in 2002. In 2023, the City was awarded $3,122,648 in ECRG grant funding from DTSC to remediate the hazardous site for future Affordable housing. Our team is currently working with DTSC to complete the remediation by 2026. The proposed reuse consists of developing a micro home community of 26 prefabricated units of 100% Affordable rental housing. The units will be reserved for households at or below 30% AMI and will see unhoused individuals transition to permanent housing.
1613	46620518T	1408 H St	DTC	0.29			26	State of California	Vacant	
1811	44405116T		RS-5	0.12			1	City of Fresno	Vacant	As of September 2024, this property has not been declared a surplus site.

Site ID	APN	Address	Zoning Code	Acres	Capacity (Units)			Ownership	Existing Use	Status and Remaining Steps
					Lower	Moderate	Above Moderate			
1891	50409212T		RS-5	1.74			15	City of Fresno	Vacant	As of September 2024, this property has not been declared a surplus site. It is proposed to be disposed of to a developer for a mixed-housing project.
2396	46707307T		DTN	0.28			21	City of Fresno	Vacant	City surplus site
2486	44502013T	3374 E Shields	O	2.8	224			State of California	Vacant Building: Dept of Water Resources	This project is on state surplus land (per State Executive Order N-06-19), and the State is partnering with the City to develop the site as multi-unit housing. The state completed its RFP process at the end of 2023 and selected Alexis Laing as the Developer. Project is now in predevelopment. Development of the 2.8 acre site with multi-unit housing including 50% 3-bedroom units and with a range of affordability in two phases: Ph. 1 includes 84 units and deeper affordability with a special needs set-aside. Ph 2 is anticipated at 140 units with higher AMI unit mix. Development will include energy efficient plumbing and lighting fixtures, as well as drought tolerant landscaping and hydrozones to maximize water efficiency on site. Each building will achieve a minimum silver LEED or GreenPoint rating. Solar PW panels will be installed on both projects. Phases 1 and 2: Due Diligence, Community Outreach, Entitlement, Financing 11/23 – 5/25; Construction 11/25
TOTAL				**55.24**	**2,042**	**59**	**339**			

Source: City of Fresno, September 2024.

Suitability of Large Sites

There are 10 vacant sites and12 non-vacant sites included in the lower-income inventory that are larger than 10 acres. While the allowable density on these sites exceeds the default density of 30 units per acre, qualifying them as lower-income sites, the size and sheer number of units allowed make it more likely that they would be further subdivided and/or built with a mix of housing types at various income levels. Several assumptions are applied to large sites to reflect more realistic assumptions for the mix of incomes that could be accommodated on the sites.

Most of these large sites are in the West Area Neighborhood Specific Plan (WANSP) boundary, west of Highway 99. The City is in the process of developing a Specific Plan for the future growth and development in this area. The Specific Plan is scheduled to be considered for adoption in the first quarter of 2025. The Draft Specific Plan calls for land use changes; however, because it is not yet adopted, the Draft Housing Element reflects the currently adopted land use designations. Once the Specific Plan has been adopted, the Draft Housing Element will be updated to reflect the new designations. There is a significant amount of developable land in the area, so many of the sites in the inventory are within the plan area boundary. Because the area has been and continues to transition from agriculture to urban development, many of the sites are larger in size than sites in other parts of the city.

Most of the large sites in the WANSP area are located along the Shaw Avenue Corridor, in an area referred to as the West Shaw Avenue Town Center. Assumptions for the Town Center parcels are described in more detail in the following section below.

Based on recent examples of large site developments (refer to **Table 1E-2.12**), large scale 100 percent affordable projects with more than 150 units have successfully been built in Fresno. For example, Parc Grove Commons is an affordable development with 215 units. Given this trend, the Housing Element assumes that if a site's total capacity is 250 units or fewer, it is feasible to develop the site as 100 percent affordable housing. For larger sites where the total capacity exceeds 250 units, it is assumed that the project would be subdivided to create a mixed-income development, with 20 percent lower-income units, 60 percent moderate-income units, and 20 percent above moderate-income units. This is similar to how Fancher Creek and West Creek Village were developed (see **Table IE-2.11**).

Two of the four large vacant sites outside of the West Shaw Avenue Town Center boundary are owned by the Fresno Housing Authority (Sites 988 and 1129/1130). Site 988 is a 14.57-acre parcel zoned RM-2, while Site 1129/1130 is an 11.3-acre split zoned parcel, with a 6.10-acre portion of the site zoned RM-2. It is realistic to assume that these RM-2 sites will be developed with 100 percent affordable housing given ownership by the Housing Authority (see **Table 1E-2.10** below).

Of the non-vacant sites, there are four large RM-2 sites outside of the Town Center (Sites 808, 979, 1076, and 1223). The non-vacant RM-2 sites include an 18.8-acre parcel currently in agricultural use on South Walnut Avenue (Site 1223), an 18.4-acre parcel on West Whites Bridge Avenue also currently in agricultural use (Site 1076), and a 28.37-acre parcel split-zoned parcel of which 22.57 acres is zoned RM-2 (Site 979). There is also one large non-vacant site zoned RM-3 (Site 853) at 6277 W Shaw Ave that is currently in agricultural use. The sites inventory applies an assumption of 20 percent lower-income, 60 percent moderate-income, and 20 percent above moderate-income housing on these parcels (see **Table 1E-2.10** below).

The last parcel in **Table 1E.2-10** is a 10.6-acre parcel zoned RMX (APN 417-34-223) on the corner of West Shaw Avenue and Blackstone Avenue. There are two small retail uses on the site, including a restaurant and an eyeglass store, as well as a residence that collectively cover about half of the site. The sites inventory assumes only 60 percent of the site is developed with residential infill housing and the remaining 40 percent remains occupied by existing uses.

In total, the inventory assumes 3,279 units on the eleven large sites shown in **Table 1E-2.10**, including 1,480 lower-income units, 1,329 moderate income-units, and 470 above moderate-income units.

West Shaw Avenue Town Center

One of the areas with the greatest amount of future housing potential is the West Shaw Avenue Town Center, which is envisioned in the General Plan to be developed as a high-density, urban mixed-use corridor supported by enhanced transit service. There are 29 sites in the West Shaw Avenue Town Center mostly designated for mixed use development; 11 sites are larger than 10 acres and are considered "large sites." Because all of the sites are concentrated in one area, the assumptions described below are applied to all sites within the Town Center, not just large sites.

While the Draft Specific Plan does not call for any specific phasing of the Town Center, given the scale of the Town Center, it is expected that it will develop over a longer timeframe than the 8-year housing element planning period. Also, given the large size of the mixed use sites and the lack of existing retail in the area, it is anticipated that there will be a greater percentage of commercial uses compared to the smaller, infill parcels located on mixed use corridors where there is already a significant amount of existing retail. To reflect this, the sites inventory applies the following assumptions to both small and large sites in the West Shaw Avenue Town Center:

- **Mix of uses.** Sites designated mixed-use in the Town Center are assumed to have 60 percent residential and 40 percent commercial. This is slightly higher than the 30-40 percent residential that is required in the mixed use designations. This assumption for the mix of uses is layered on top of the 50 percent likelihood assumptions applied to the site, which already accounted for a portion of the site developing as commercial.

- **Mix of incomes.** Sites in the Town Center that allow 30 units per acre, qualify as "lower-income," and have a capacity of 250 units or fewer are counted as 100 percent affordable. The remaining sites are counted as 20 percent lower-income, 60 percent moderate-income, and 20 percent above moderate-income to reflect a vision of a variety of housing types and to avoid a concentration of lower-income units on large sites. This applies to sites designated CMX, RMX, and RM-2. The parcel designated RM-1 is assumed to be moderate-income.
- **Development phasing.** Only 50 percent of the capacity of the sites in the Town Center is counted in the sites inventory to reflect an assumption that about half of the area could build out during the Housing Element planning period. Rather than selecting which parcels to include and which to exclude, the 50 percent capacity assumption is applied to all sites in the Town Center. This is shown in the table as "50% Likelihood." This means that what is shown as the total capacity for each individual site is significantly less than the actual realistic capacity for the site.

Figure 1E-2.6 shows the sites within the West Shaw Avenue Town Center and **Table 1E-2.11** summarizes the inventoried capacity by land use designation. In total, there are 3,227 units counted in the sites inventory in this area, including 1,177 lower-income, 1,585 moderate-income, and 395 above moderate-income units.

To help achieve the assumptions used in the sites inventory, the Housing Element includes an implementation program to help facilitate the subdivision of large sites into parcels that are more appropriately sized for affordable housing.

Table 1E-2.10: Large Sites (Excluding West Shaw Avenue Town Center)

Site ID	APN	Parcel Size (Acres)	Zone	Location/ Site Description	Lower-Income Units	Moderate - Income Units	Above-Moderate Units	Total Inventoried Units	Assumptions	Existing Use
Vacant Large Sites										
768	506-13-039	10.48	RM-2	Near W Sierra Ave & N Vista Ave	189	0	0	189	100% Lower	Vacant
780	504-09-209	13.1	RM-2	N Hayes Ave near W Herndon Ave	236	0	0	236	100% Lower	Vacant
988	511-02-301	14.57	RM-2	5677 W Dakota Ave (Housing Authority site)	262	0	0	262	100% Lower	Vacant
1129/ 1130	477-04-075ST	11.30 (split-zoned); 6.10-acres zoned RM-2	RM-2	901 W Atchison Ct. (Housing Authority site)	109	-	-	109	100% Lower	Vacant
Non-Vacant Large Sites										
127	417-34-223	10.65	RMX	Corner of Blackstone and Shaw (20 W Shaw Ave)	57	172	57	286	60% Res, 40% Com 20% Lower, 60% Mod, 20% Above-Mod	Assortment of uses, portion of site is vacant
808	505-08-042S	11.92	RM-2	N Bryan Ave at Bullard Ave	214	0	0	214	100% Lower	Agriculture
853	512-03-203	19.23	RM-3	6277 W Shaw Ave	130	389	130	649	20% Lower, 60% Mod, 20% Above-Mod	Agriculture, canal through middle of parcel

Site ID	APN	Parcel Size (Acres)	Zone	Location/ Site Description	Lower-Income Units	Moderate - Income Units	Above-Moderate Units	Total Inventoried Units	Assumptions	Existing Use
979	512-04-317S (28.37-acre parcel with split zoning)	22.57-acre portion	RM-2	Corner of W Ashlan Ave & N Grantland Ave	81	244	81	406	20% Lower, 60% Mod, 20% Above-Mod	Agriculture
1076	326-10-076	18.38	RM-2	3555 W Whites Bridge Ave	66	199	66	331	20% Lower, 60% Mod, 20% Above-Mod	Agriculture
1223	328-08-001S	18.80	RM-2	2867 S Walnut Ave	68	203	68	339	20% Lower, 60% Mod, 20% Above-Mod	Agriculture
2478	310-20-103	58.05	RM-2	3518 N Fowler	68	122	68	258	20% Lower, 60% Mod, 20% Above-Mod	Residential/ Agriculture
TOTAL					**1,480**	**1,329**	**470**	**3,279**		

Source: City of Fresno and Ascent, September 2024.

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Table 1E-2.11: West Shaw Avenue Town Center Sites

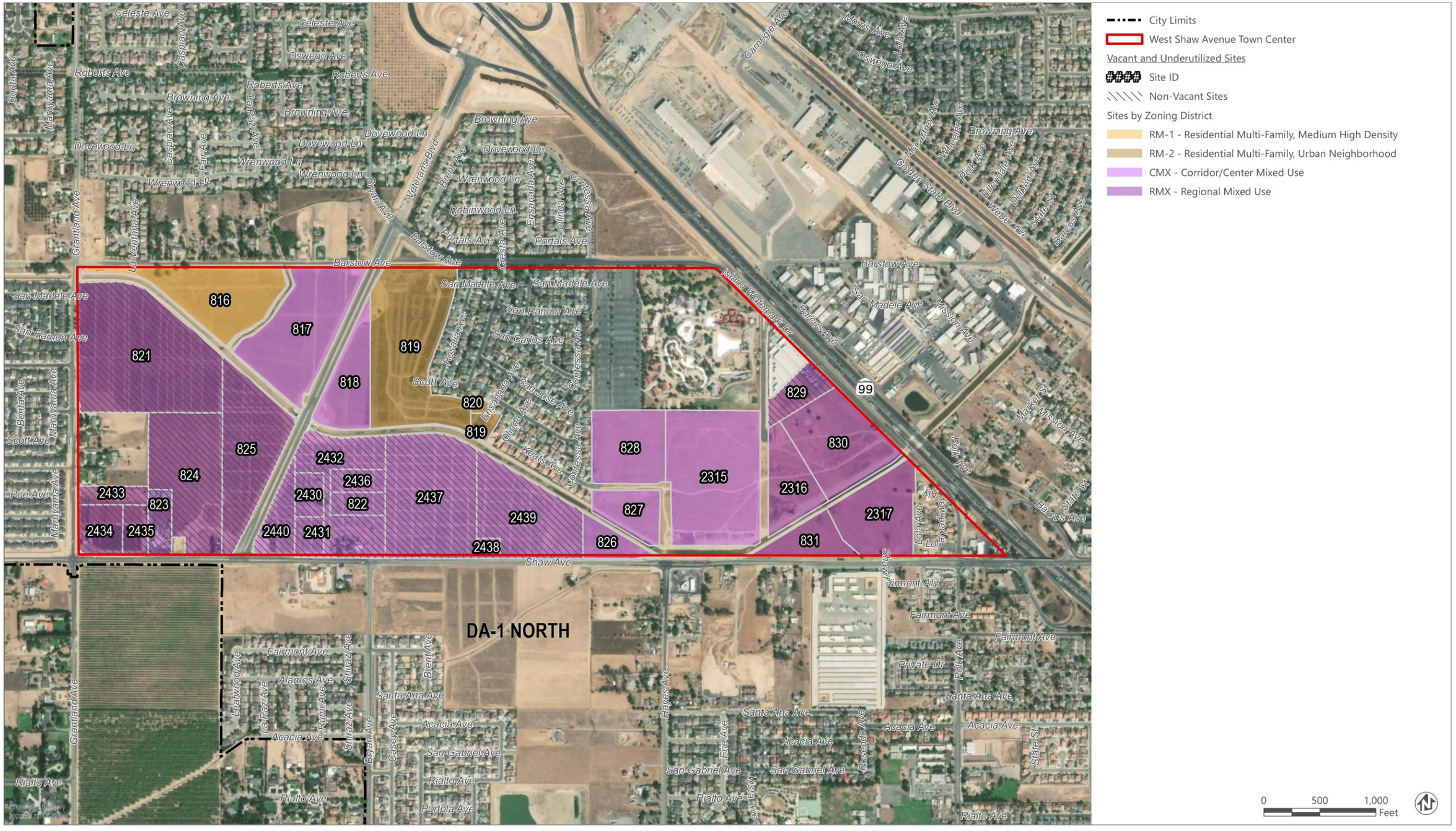
Site ID	APN	Total Parcel Size (Acres)	Zoning	Location/Site Description	Max Density	Total Capacity at Max Density	Inventoried Capacity				Assumptions	Existing Use
							Lower-Income Units	Moderate-Income Units	Above-Moderate Units	Total Units		
Vacant Sites												
816	505-06-008 (38.33 acre parcel, split zoning)	13.26 portion	RM-1	6785 W Barstow Ave	16	212	0	90	0	90	50% Likelihood 100% Mod	Vacant
817		16.98 portion	CMX		75	1,274	38	115	38	191	50% Likelihood 60% Res, 40% Com 20% Lower, 60% Mod, 20% Above-Mod	
818		7.80 portion	CMX		75	585	18	53	18	89		
819	505-06-074	24.05	RM-2	W Scott Ave near W Barstow Ave and End of N Ensenada Ave (consolidated sites)	30	735	44	132	44	220	50% Likelihood 20% Lower, 60% Mod, 20% Above-Mod	Vacant
	505-06-066	1.33										
820	505-06-070	0.45										
826	505-06-024	3.30	CMX	6130 W Shaw Ave	75	248	37	0	0	37	50% Likelihood 60% Res, 40% Com 100% Lower	Vacant
827	505-06-068	5.15	CMX	6010 W Shaw Ave	75	387	58	0	0	58	50% Likelihood 60% Res, 40% Com 100% Lower	Vacant
828	505-06-067	9.20	CMX	End of W Keats Ave	75	690	103	0	0	103	50% Likelihood 60% Res, 40% Com 100% Lower	Vacant
830	508-03-025	13.27	RMX	N Island Waterpark Dr at canal	90	1,194	36	107	36	179	50% Likelihood 60% Res, 40% Com 20% Lower, 60% Mod, 20% Above-Mod	Vacant
831	508-03-004	5.56	RMX	5708 W Shaw Ave	90	500	75	0	0	75	50% Likelihood 60% Res, 40% Com 100% Lower	Vacant
2315	508-03-014	22.38	CMX	North of W Shaw Ave, south of Island Waterpark	75	1,678	50	151	50	251	50% Likelihood 60% Res, 40% Com 20% Lower, 60% Mod, 20% Above-Mod	Vacant
2316	508-03-026	7.23	RMX	North of W Shaw Ave, south of Island Waterpark	90	651	0	98	0	98	50% Likelihood 60% Res, 40% Com 100% Lower	Vacant
2317	508-03-005	11.16	RMX	N Lola Ave at W Shaw Ave	90	1,005	30	90	30	150	50% Likelihood 60% Res, 40% Com 20% Lower, 60% Mod, 20% Above-Mod	Vacant

Site ID	APN	Total Parcel Size (Acres)	Zoning	Location/Site Description	Max Density	Total Capacity at Max Density	Inventoried Capacity				Assumptions	Existing Use
							Lower-Income Units	Moderate-Income Units	Above-Moderate Units	Total Units		
Non-Vacant Sites												
821	505-06-007	28.65	RMX	5326 N Grantland Ave	90	2,578	77	232	7	386	50% Likelihood 60% Res, 40% Com 20% Lower, 60% Mod, 20% Above-Mod	Agriculture
822	505-06-033	2.30	CMX	North of W Shaw Ave and N Bryan Ave intersection	75	173	26	0	0	26	50% Likelihood 60% Res, 40% Com 100% Lower	Agriculture
823	505-06-020	2.84	RMX	6824 W Shaw Ave	90	255	38	0	0	38	50% Likelihood 60% Res, 40% Com 100% Lower	Residence and trucking
824	505-06-076	16.52	RMX	6730 W Shaw Ave	90	1,486	45	134	45	224	50% Likelihood 60% Res, 40% Com 20% Lower, 60% Mod, 20% Above-Mod	Agriculture and residence
825	50-506-016S (19.09 acre parcel, split zoning)	14.93 portion	RMX	W Shaw Ave east of N Grantland Ave	90	1,343	40	121	40	201	50% Likelihood 60% Res, 40% Com 20% Lower, 60% Mod, 20% Above-Mod	Agriculture
2440		4.20 portion	CMX		75	315	9	28	9	46		
829	508-03-027	3.62	RMX	N Island Waterpark Dr	90	325	49	0	0	49	50% Likelihood 60% Res, 40% Com 100% Lower	Part of parcel vacant
2430	505-06-041	2.31	CMX	6556 W Shaw Ave	75	173	26	0	0	26	50% Likelihood 60% Res, 40% Com 100% Lower	Agriculture
2431	505-06-042	2.12	CMX	W Shaw Ave north of intersection with N Bryan Ave	75	159	24	0	0	24	50% Likelihood 60% Res, 40% Com 100% Lower	Agriculture
2432	505-06-034	11.00	CMX	6518 W Shaw Ave	75	825	124	0	0	124	50% Likelihood 60% Res, 40% Com 100% Lower	Agriculture and residence
2433	505-06-036	2.34	RMX	North of W Shaw Ave & N Grantland Ave intersection	90	210	32	0	0	32	50% Likelihood 60% Res, 40% Com 100% Lower	Agriculture
2434	505-06-037	3.93	RMX	6972 W Shaw Ave	90	353	53	0	0	53	50% Likelihood 60% Res, 40% Com 100% Lower	Agriculture and farmstand

Site ID	APN	Total Parcel Size (Acres)	Zoning	Location/Site Description	Max Density	Total Capacity at Max Density	Inventoried Capacity				Assumptions	Existing Use
							Lower-Income Units	Moderate-Income Units	Above-Moderate Units	Total Units		
2435	505-06-038	2.30	RMX	East of 6972 W Shaw Ave	90	207	31	0	0	31	50% Likelihood 60% Res, 40% Com 100% Lower	Agriculture
2436	505-06-034	2.30	CMX	North of W Shaw Ave & N Bryan Ave intersection	75	173	26	0	0	26	50% Likelihood 60% Res, 40% Com 100% Lower	Agriculture
2437	505-06-017	20.31	CMX	6392 W Shaw Ave	75	1,523	46	137	46	229	50% Likelihood 60% Res, 40% Com 20% Lower, 60% Mod, 20% Above-Mod	Agriculture
2438	505-06-039	0.85	CMX	West of 6150 W Shaw Ave	75	64	10	0	0	10	50% Likelihood 60% Res, 40% Com 100% Lower	Agriculture
2439	505-06-040	14.31	CMX	6150 W Shaw Ave	75	1,073	32	97	32	161	50% Likelihood 60% Res, 40% Com 20% Lower, 60% Mod, 20% Above-Mod	Agriculture
TOTAL							**1,177**	**1,585**	**395**	**3,227**		

Source: City of Fresno and Ascent, September 2024.

Figure 1E-2.6: West Shaw Avenue Town Center Sites, Fresno 2023



Source: City of Fresno and Ascent, June 2023

Large Site Examples

The sites inventory assumes that larger parcels could be further subdivided to create smaller developable sites for housing at a range of income levels. There are several recent developments that serve as examples that this is possible. **Table 1E-2.12** depicts recent examples which include below market rate units and the following section provides more detail for each project.

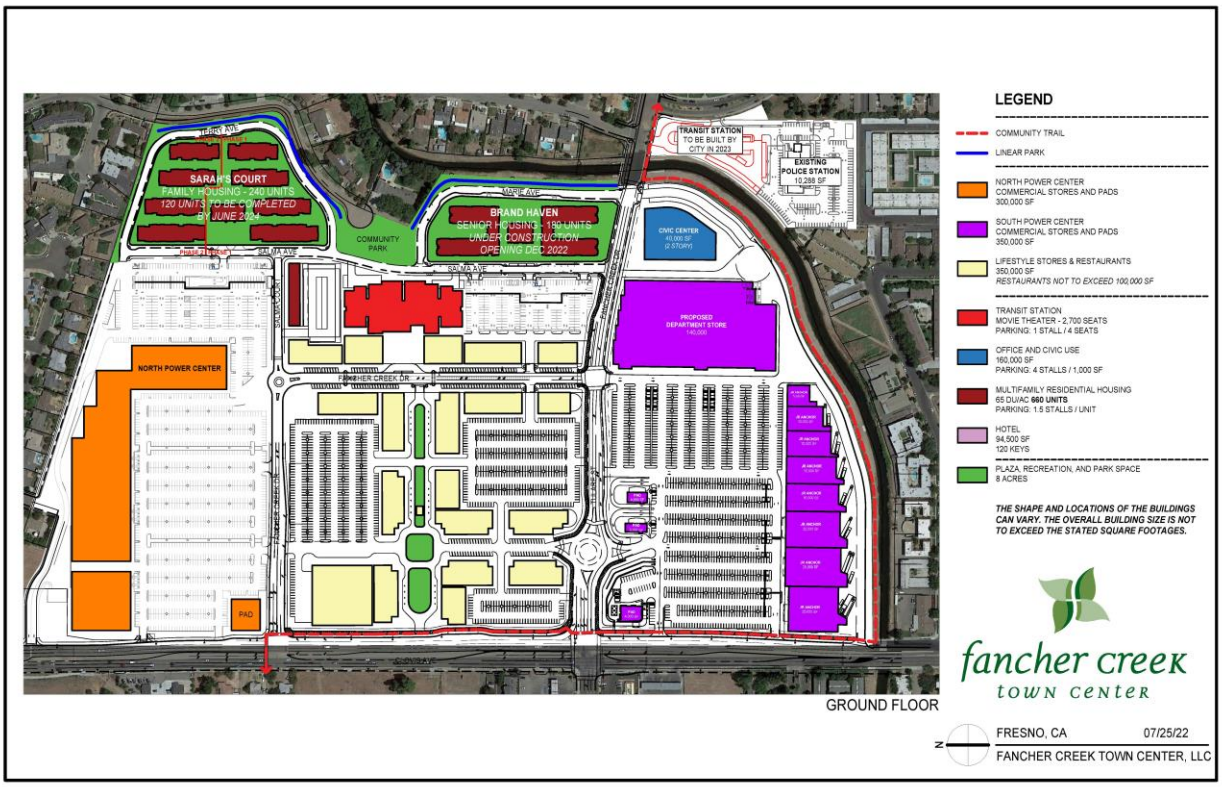
Table 1E-2.12: Summary of Recent Developments on Large Sites

Project	Total Size (acres)	Deed-Restricted Affordable	Market Rate	Total Units
Fancher Creek Town Center	91 acres	420	240	660
The Vineyards	38.92 acres	158	0	158
West Creek Village	120 acres	120	135	255
Parc Grove Commons	24 acres	213	2	215
Campus Pointe	27.45 acres	0	550	550
Avalon Commons	7.1 acres (total site: 17.8 acres)	104	1	105

Source: City of Fresno and Ascent, July 2024.

Fancher Creek Town Center

The Fancher Creek Town Center is a recent example of a large-scale, mixed-use project that provides a mix of affordable and market rate housing integrated into a shopping and employment district, with well over one million square feet of commercial, office, civic, hotel, theater, plaza, recreation, and park uses. The Fancher Creek Town Center encompasses three 2015-2023 Fresno Housing Element Sites (APNs 31302101 at 46.84 acres, 31310124 at 40.08 acres, and 31310122 at 4.14 acres) for a total of 91 acres. The project includes 660 multi-family residential units across three projects: the constructed Brandhaven Senior Affordable Housing with 180 units, the Sarah's Court Family Affordable Housing with 120 units in Phase 1 (under construction) and an additional 120 units planned, and a planned four-story 240-unit market rate multifamily residential building. This project is an example of a large site that was developed with 63 percent lower-income housing (i.e., 420 affordable units) and 36 percent market rate (240 units).



Fancher Creek Town Center Site Plan

Source: City of Fresno, 2024.

The Vineyards California Armenian Home Community – Senior Housing

California Armenian Home, a not-for-profit corporation, donated 40-acres of land to develop The Vineyards, a continuing care retirement community. The Vineyards opened for residency in January 2018 and includes a total of 158 units featuring 12 resort-style independent living villas with two car garages, 60 independent living apartments, and 50 assisted living and 36 memory care apartments. The Vineyards was developed on a prior 2015-2023 Fresno Housing Element Site (APN 31328043) at 22.22 acres. The Vineyards also offers outdoor amenities such as gardens, courtyards, patios, sheltered walkways, open park space, fountains, and large outdoor pavilions.



Image of The Vineyard

Source: Life at the Vineyards.

West Creek Village

The West Creek Village Project is a 120-acre multi-phase mixed-use project consisting of single-family homes, multi-family mixed-income housing, a new community park and approximately 323,000 square feet of medical, business, and retail. All three phases of the West Creek Villages are planned on an 18-acre site. All properties were annexed into the city after the 2015-2023 Housing Element. The overall project was conceived from the Southwest Fresno Specific Plan adopted in 2017.

The West Creek Village project includes the built West Fresno Center – Fresno City College (600 E Church Avenue), entitled/permits issued City of Fresno community park, proposed commercial, approved tract map for Emerald Creek single family residential (134 units) subdivision, and entitled Phase 1 of the Villages at West Creek by Self Help Enterprises with 121 supportive multi-family housing units (120 affordable units and 1 market rate manager's unit) consisting of 38 one bedroom, 51 two bedrooms and 32 three bedrooms. The Villages at West Creek assumes 53 percent of the restricted units will serve households with incomes less than 30 percent of AMI; 11 percent for households with incomes less than 50 percent of AMI; and 36 percent for households earning less than 60 percent of AMI; and 1 percent will be a manager's unit. Additionally, the project will set aside a minimum number of units for farmworkers and those impacted by homelessness.



West Creek Village Site Plan

Source: City of Fresno, 2024. Blue Ocean Development, 2021.

Parc Grove Commons

Parc Grove Commons, a two- and three-story affordable housing community consisting of 215 units in 32 buildings, was developed in two-phases in 2011 and 2014 by the Fresno Housing Authority. This development is all residential on a 24-acre site made up of four parcels (10.63, 7.73, 4.51, and 1.74 acres respectively). Parc Grove Commons has 67 extremely and very low-income units, 146 low-income units, and 2 manager's units.



Parc Grove Commons Site Plan

Source: City of Fresno, 2024.

Campus Pointe

Campus Pointe is a 48.18-acre horizontal mixed-use development containing senior and student housing owned by Fresno State University and a local developer. The 550 units of residential was built in four phases. Phase one residential was the Palazzo at Campus Pointe apartments built in 2009 on 11.18 acres (244 units). Phase two residential was the Palmilla at Campus Pointe apartments built in 2012 is on 5.74 acres (144 units). Phase three residential was the Maravillosa-Luxury Senior Living apartments built in 2021 on a 3.66-acre site (142 units). Phase 4 residential, on a 6.56-acre site, is under construction is an extended stay Hyatt House with 138 rooms offering condo-like living and is scheduled for completion in 2025. The retail portion of the development was built in 2015 and includes 20.73 acres plus parking.



Campus Pointe Site Plan

Source: City of Fresno, 2024.

Avalon Commons

Avalon Commons is a 105-unit affordable multi-family housing project by Fresno Housing utilizing Low Income Housing Tax Credits (LIHTC) and No Place Like Home (NPLH) funding. The project is located at Chestnut and Alluvial Avenue in northeast Fresno. The original site was approximately 18 acres and was subdivided into two parcels, an 11.5-acre parcel for Rocky Ranch luxury apartments and a 7.1-acre site for Avalon Commons. Avalon Commons was approved and entitled on June 25, 2022. Construction is underway with a slated completion date of July 1, 2025. There will be two phases of this development. Phase I contains 60 units, including 59 affordable units. Phase II will include 45 affordable units.

AB 725 Compliance

Assembly Bill 725 (2021) – which requires that at least 25 percent of the remaining above moderate-income RHNA be accommodated on sites that have a density standard that allows at least four units of housing, and that at least 25 percent of the remaining moderate-income RHNA be accommodated on sites that allow at least four units of housing but a density of no more than 100 units per acre. After counting the units in planned and approved projects and final subdivision maps, the remaining RHNA is 13,830 above moderate-income units and 4,597 moderate-income units. In order to comply with AB 725, the sites inventory must include 3,458 above moderate-income units and 1,149 moderate-income units on sites meeting the above mentioned criteria.

The Housing Element sites inventory meets the requirements of AB 725 through the following:

- Sites smaller than 0.5 acres that are zoned as high density residential (RM-2, RM-3), mixed use and commercial (NMX, CMX, RMX, CR, CMS), and Downtown districts (DTN, DTC, DTG, DTG-AH) are counted toward the above moderate-income inventory. All of these sites have zoning that allows at least four units of housing.
- Sites larger than 10 acres and all sites within the West Shaw Avenue Town Center that meet the default density standard for lower-income RHNA (i.e., 30 units per acre) are counted in the sites inventory with a mix of incomes, generally 20 percent lower-income, 60 percent moderate-income, and 20 percent above moderate-income. This assumption helps to ensure the inventory complies with AB 725.
- The moderate-income RHNA is met on sites within the RM-2 and RM-MH zones, both of which allow at least four units of housing per site but are well below the 100 units per acre maximum identified in AB 725.

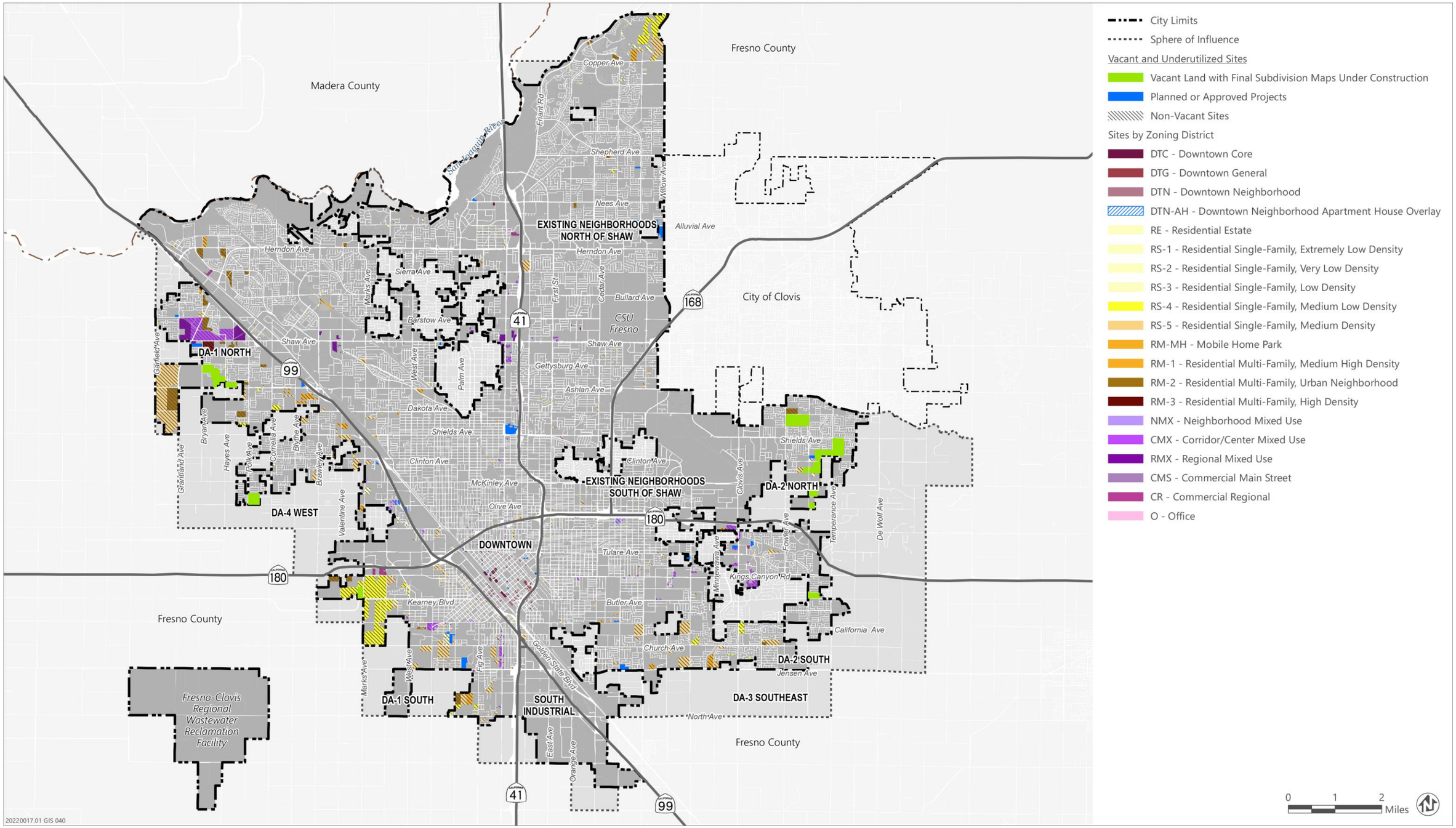
Table 1E-2.12 below summarizes how the Housing Element complies with AB 725. The sites inventory includes capacity for 3,483 above moderate-income units on sites complying with AB 725 criteria, which exceeds the target of 3,458 above moderate-income units; and the inventory includes capacity for 4,756 moderate-income units on sites complying with AB 725 criteria, which also exceeds the target of 1,149 moderate-income units.

Table 1E-2.13: AB 725 Compliance

Capacity (Units)	Above Moderate Income	Moderate Income
RHNA	**15,904**	**5,638**
Approved Projects	1,107	1,041
Final Subdivision Maps	967	-
Remaining RHNA	*13,830*	*4,597*
25% of Remaining RHNA (AB 725 Target)	**3,458**	**1,149**
Capacity on Qualifying Sites	**3,483**	**4,756**

Source: City of Fresno and Ascent, 2024.

Figure 1E-2.7: Sites Inventory, City of Fresno, 2024



Source: City of Fresno and Ascent, September 2024.

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Sites Identified in Previous Housing Elements

Per statute (Government Code Section 65583.2I), a non-vacant site identified in the previous planning period and a vacant site that has been included in two or more previous consecutive planning periods can only be used to accommodate the lower income RHNA if the site is subject to a program in the housing element allowing residential development by right for housing developments in which at least 20 percent of the units are affordable to lower-income households.

Several sites included in the inventory for lower-income housing have been included in previous housing element planning periods. However, the City cannot easily distinguish which vacant sites were included in the Fourth Cycle Housing Element lower-income sites inventory. The sites inventory identifies all sites – vacant and non-vacant – that were included in the Fifth Cycle Housing Element and applies the by-right policy to all the identified lower-income sites. These sites are identified in **Table 1E-7.1** and **Table 1E-7.2** in Section 1E-7 (Detailed Sites Inventory Tables). The Housing Element includes a policy that commits the City to allowing residential use by right on these sites when at least 20 percent of the units are affordable to lower income households.

Accessory Dwelling Units

Per state law, a projection of the number of ADUs expected to be built within the eight-year planning period can also be considered as part of the inventory. The City has seen an increase in ADU production in recent years, particularly since 2018 when the state passed several bills to facilitate ADUs statewide. **Table 1E-2.14** shows the total number of ADU building permits issued by year since 2018, which equates to an average of 11 ADUs per year. For the purpose of the Housing Element, it is assumed that ADU production will continue at the same pace experienced since 2018, resulting in 94 ADUs counted toward the 2023-2031 RHNA (8.5 year planning period). The City has included a program to monitor compliance with State law and facilitate construction of ADUs.

Table 1E-2.14: ADU Building Permits, 2018-2023

Year	ADU Permits Issued
2018	2
2019	4
2020	6
2021	19
2022	22
Average	11
Projected ADUs	**94**

Source: City of Fresno and Ascent, 2023.

Because regional affordability analysis of ADUs was not available for Fresno County, the City applied rental rates for one- and two-bedroom units as a proxy for ADU rental rate. According to 2017-2021 ACS 5-year estimates, the median gross rent for one-bedroom units in Fresno is $873 per month, and $941 per month for two-bedroom units. Low-income households in Fresno County can afford between $1,091 (one-person households) and $1,558 (four-person households) in monthly housing costs without being cost burdened (see **Table 2-24**). Comparing rental rates with the affordability of low-income households demonstrates that ADUs are appropriate to credit toward the City's lower-income RHNA, based on the median price of one- and two-bedroom units. However, the City has decided to take a conservative approach and assume that 30 percent of ADUs will be affordable to lower-income households, 40 percent affordable to moderate-income households, and 30 percent affordable to above moderate-income households. Based on this methodology, the sites inventory includes a projection of 94 ADUs, including 28 affordable to lower-income households, 38 affordable to moderate-income households, and 28 affordable to above moderate-income households.

RHNA Summary

Table 1E-2.15 provides a summary of Fresno's ability to meet the 2023-2031 RHNA of 36,866 housing units. Within the city limits, available vacant and underutilized sites are adequate to accommodate the RHNA for all income categories. The city has capacity for 18,783 lower-income units, which is 3,459 lower-income units in excess of the lower-income RHNA.

Table 1E-2.15: RHNA Summary, Fresno, September 2024

Project	Units by Income Level				Total Units
	VLI	LI	MI	AMI	
2023-2031 RHNA	**9,440**	**5,884**	**5,638**	**15,904**	**36,866**
Planned or Approved Projects (Table 1E-2.3)	292[1]	317	1,041	1,107	2,757
Vacant Land with Final Subdivision Maps Under Construction (Table 1E-2.4)	0	0	0	967	967
Capacity on Vacant Sites (Table 1E-7.1)		11,111	3,096	8,025	22,232
Capacity on Underutilized Non-vacant Sites (Table 1E-7.2)		7,035	2,488	8,127	17,650
Accessory Dwelling Units (Table 1E-2.13)		28	38	28	94
Total Capacity		**18,783**	**6,664**	**18,254**	**43,700**
Surplus/Shortfall		*3,459*	*1,026*	*2,350*	*6,834*

VLI = Very-low Income, LI = Low-income, M = Moderate-income, AM = Above-moderate Income

1 Includes Extremely-low Income and VLI units

Source: City of Fresno and Ascent, 2024.

Availability of Infrastructure and Services

Realistic site development potential indicated in the sites inventory is consistent with the development capacity reported in the Fresno General Plan Urban Form, Land Use, and Design Element. Full urban-level services are available throughout the city and specifically to each site in the inventory. Such services are more than adequate for the potential unit yield on each site. Specifically, water and sewer services are available or are programmed to be made available for all the sites included in the inventory, indicating the capacity to accommodate the City's total share of the RHNA.

Infrastructure Current Availability

The City of Fresno Department of Public Utilities (DPU) provides potable water to the majority of the city and non-potable water to a small portion of the city for irrigation. The city currently receives water from four water supply sources:

1. Surface water that is delivered to the city by two separate sources:
    a. Fresno Irrigation District (FID) Agreement for Kings River water.
    b. United States Bureau of Reclamation (USBR) Central Valley Project (CVP) Friant Division Contract for San Joaquin River water.
2. Groundwater that is pumped from wells located within the city.
3. Recycled water that is treated at the Fresno-Clovis Regional Wastewater Reclamation Facility (RWRF) and North Fresno Wastewater Reclamation Facility (NFWRF). This water may be used for non-potable uses.

The City's 2020 Urban Water Management Plan (UWMP) demonstrates that under normal water year, single dry water year, and five-year consecutive drought, the City's water supplies are adequate to meet projected demands. The UWMP analysis includes current water demands within the city as well as anticipated water demands associated with future development projects and planning areas within the Fresno General Plan Sphere of Influence (SOI) through 2045. The City has always met system water demand and regardless of regional hydrology is projected to meet existing and future water demands.

The City has adopted long-range capital and strategic programs through the City of Fresno Metro Plan, City of Fresno Recycled Water Master Plan, and City of Fresno Wastewater Master Plan. The City has also adopted the State's 2013 CalGreen Building Code, Model Water Efficient Landscape Ordinance, and Graywater Standards, which combine for a 10- to 20-percent reduction in water use in most new construction. General Plan Policy RC-6-b directs the City to adopt and implement ordinances, standards, and policies to achieve the intent of the City of Fresno Urban Water Management Plan, Fresno-Area Regional Groundwater Management Plan, and City of Fresno Metropolitan Water Resources Management Plan to ensure a dependable supply of water. General Plan Policy RC-6-c directs land use and development projects to adhere to the objective of the Fresno Metropolitan Water Resources Management Plan to provide sustainable and reliable water supplies to meet the demand of existing and future customers through 2045.

The City completed construction on the 80-mgd Southeast Surface Water Treatment Facility (SESWTF) in 2018, while the City's Northeast Surface Water Treatment Facility (NESWTF) currently has a 30-mgd capacity and the capability to expand up to 60 mgd. The City is also planning to develop additional groundwater recharge facilities that would optimize use of available surface water supplies in normal and wet years. The timing for the NESWTF expansion and the development of additional groundwater recharge facilities will be examined as part of the City's future Metro Plan update and determined based on need as the city grows and demands increase. The City also plans to continue expanding its recycled water distribution system to offset potable water demands.

A substantial reduction in water demand followed the completion of residential meter installation in 2013 combined with drought restrictions and water conservation messaging. As a result, demand has averaged roughly 120,000 acre-feet per year (afy) for 2018 to 2020 instead of growing to roughly 170,000 afy by 2020 as projected in the 2014 Metro Plan. The increase in use of surface water supplies combined with decrease in demands through conservation is allowing the groundwater basin to recover. These developments positioned the City to participate in development of the North Kings Groundwater Sustainability Plan (GSP) and to meet the requirements of the 2014 Sustainable Groundwater Management Act (SGMA).

The City of Fresno is the regional sewer agency for the Fresno-Clovis Metropolitan Area. The City owns and maintains the wastewater collection system that serves the city and the other participating agencies. The City also owns and operates the Fresno-Clovis Regional Wastewater Reclamation Facility (RWRF), located southwest of the city, and the North Fresno Water Reclamation Facility.

The City of Fresno Department of Public Utilities (DPU) manages the sewer system through the implementation of the sewer maintenance program provided in its Sewer System Management Plan and the construction of sewer development projects recommended in its Wastewater Collection System Master Plan (Master Plan). The Master Plan evaluates sewer system capacity under existing and anticipated future conditions based on the buildout of development to the City's SOI as represented in the Fresno General Plan. The 2015 Master Plan incorporated all of the recommended sewer projects into a Capital Improvement Program for implementation to 2025. The City of Fresno has been regularly implementing various elements of the Capital Improvement Program since the adoption of the Master Plan.

The capacity analysis conducted in the 2015 Master Plan determined that the collection system has sufficient capacity to convey Base Water Flow, Peak Dry Weather Flow, and Peak Wet Weather Flow. However, there were a few areas where deficiencies were found in the existing and future sewer collection system capacity and improvement projects were recommended. Most improvements identified were driven by future development, which consist of new sewers that serve future growth or improvements to existing facilities that are needed to serve future growth. The City's first priority is to upgrade existing facilities and then build new trunks to serve future users. Improvement projects in the Master Plan were organized into four phases spanning from 2014 through 2030.

General Plan Objective PU-4 directs the City to ensure provision of adequate trunk sewer and collector main capacities to serve existing and planned urban development, consistent with the Wastewater Master Plan. Supporting polices include continued coordination and consultation with the City of Clovis, to plan and construct sewer collection facilities, pursuing construction of new or replacement sewer trunk facilities or other alternatives consistent with the Wastewater Master Plan, and pursuing enlargement or extension of the sewage collection system to serve planned urban development.

The permitted wastewater treatment capacity of the RWRF is currently 91.5 million gallons per day (mgd) as an annual monthly average flow, and 101 mgd as a maximum monthly average flow. The 2015 Master Plan determined the existing annual monthly average flow at the RWRF to be about 64.7 mgd. Therefore, the RWRF has sufficient capacity for existing influent flows and to accommodate growth for several years to come. Nonetheless, the City is required by State statutes to begin planning for increased capacity when flows reach 75 percent of the current design capacity.

Additionally, in 2017, Phase I of a tertiary treatment system was completed at the RWRF. The current design flow for the tertiary treatment system is 5.0 mgd but can be expanded in two subsequent phases to 15 mgd (Phase II) and ultimately 30 mgd (Phase III). The City of Clovis maintains the rights and capacity to discharge 9.3 mgd to the facility. The City of Fresno maintains the rights to the remaining capacity.

Infrastructure Future Availability

The Fresno General Plan Program Environmental Impact Report (PEIR), adopted July 2021, identified the need for the expansion of existing and development of new water supply and wastewater collection infrastructure and treatment facilities. These improvements are based on build out of the General Plan. While the sites inventory represents a fraction of General Plan build out, infrastructure improvements will ensure adequate level of water and wastewater services to future development on identified sites.

To address water supply capacity for the General Plan 2035 horizon, the City, by approximately 2025, will construct an approximately 30-mgd expansion of the existing northeast surface water treatment facility, an approximately 20-mgd surface water treatment facility in the southwest portion of the city, a 25,000 acre-feet/year tertiary recycled water expansion to the RWRF, 65 new groundwater wells, a 2.0 million gallon potable water reservoir (Water Storage Tank T2) near the intersection of Clovis and California Avenues, a 4.0 million gallon potable water reservoir (Water Storage Tank T5) near the intersection of Ashlan and Chestnut Avenues, a 4.0 million gallon potable water reservoir (Water Storage Tank T6) near the intersection of Ashlan Avenue and Highway 99, 50.3 miles of regional water transmission mains ranging in size from 24-inch to 48-inch, and 95.9 miles of 16-inch transmission grid mains.

To address wastewater capacity, for the General Plan 2035 horizon, the City, by approximately 2025, will construct an approximately 70 million gallons per day (mgd) expansion of the RWRF and approximately 0.49-mgd expansion of the North Facility and a 24 mgd wastewater treatment facility within the Southeast Development Area, and a 9.6 mgd expansion at the RWRF. By approximately after the year 2025, the City will construct a 24 mgd wastewater treatment facility within the Southeast Development Area, and a 9.6 mgd expansion at the RWRF. The City will also construct capacity improvements along sewer trunk lines.

The Housing Element is consistent with adopted General Plan land use policy. As determined in the PEIR for the General Plan, planned infrastructure improvements will ensure sufficient future water and sewer capacity to accommodate the planned development, including the identified housing need (RHNA).

Environmental Constraints and Hazards

Below is a description of potential environmental constraints and hazards pertinent to the city of Fresno and how they relate to the sites in the inventory.

Flooding

The Federal Emergency Management Agency (FEMA) develops flood maps that identify areas with the highest risk of flooding. **Figure 1E-2.8** shows the locations of the existing FEMA 100-year flood zones in the city of Fresno with the Housing Element sites. While the majority of the sites in the inventory are not within a 100-year flood zone, 28 sites are within this zone (see **Table 1E-7.1** and **Table 1E-7.2**). Siting a development in a 100-year flood zone is not an impediment to construction because a minimal amount of fill can be added to the site to mitigate the potential flood risk. Construction can occur as long as the completed floor level is one foot above flood elevation. These sites must also comply with the City's Flood Plain Ordinance, which protects against risk to new and existing development by requiring any building proposed within a special flood hazard area to obtain a building permit and provide information specifically related to flood risk. The permit is reviewed by the Building Official, who has been designated as the Flood Plain Administrator, to ensure that the project will be reasonably safe from flooding and will not adversely increase flood risk elsewhere. Therefore, the presence of a 100-year flood zone will not preclude development on any of the sites in the inventory or expose future residents to potential harm.

Airport Safety Zones

There are two public airports in the city, Fresno-Yosemite International Airport and Fresno Chandler Executive Airport, and one private airport open to public use, Sierra Sky Park. The Fresno County Airport Land Use Commission (ALUC) provides guidance to local jurisdictions on determining appropriate and compatible adjacent land uses through an Airport Land Use Compatibility Plan (ALUCP). The ALUCP establishes six airport safety zones to identify the areas surrounding an airport that could be impacted by an airport accident (see **Figure 1E-2.9**). Each of the six zones have land use compatibility standards that restrict the development of land uses that could pose particular hazards to the public or to vulnerable populations in case of an aircraft accident. The accident risk level is highest within Zone 1 (Runway Protection Zone) and diminishes with each subsequent zone, with Zone 6 (Traffic Pattern Zone) having the lowest accident risk level. Structures of any kind (except for ones set by aeronautical function) are prohibited in Zone 1. Residential development is limited to very low density residential in Zones 2, 3, 4 and 5. There are no limits on residential in Zone 6 areas.

There are a number of sites in the inventory that are within zones that prohibit or severely limit residential development (i.e., Zones 1, 2, 3. and 4), making development on these sites infeasible or not possible and should be removed from the inventory (see **Figure 1E-2.9**). The ALUC recently (October 2, 2023) approved the adoption of an amended Airport Influence Area (AIA) for the Fresno-Chandler Executive Airport that changed the boundaries of the airport safety zones. Upon receiving this new data, the sites inventory was updated to remove sites within Zones 1-4 of the new AIA for Fresno-Chandler Executive Airport.

Other Constraints and Hazards

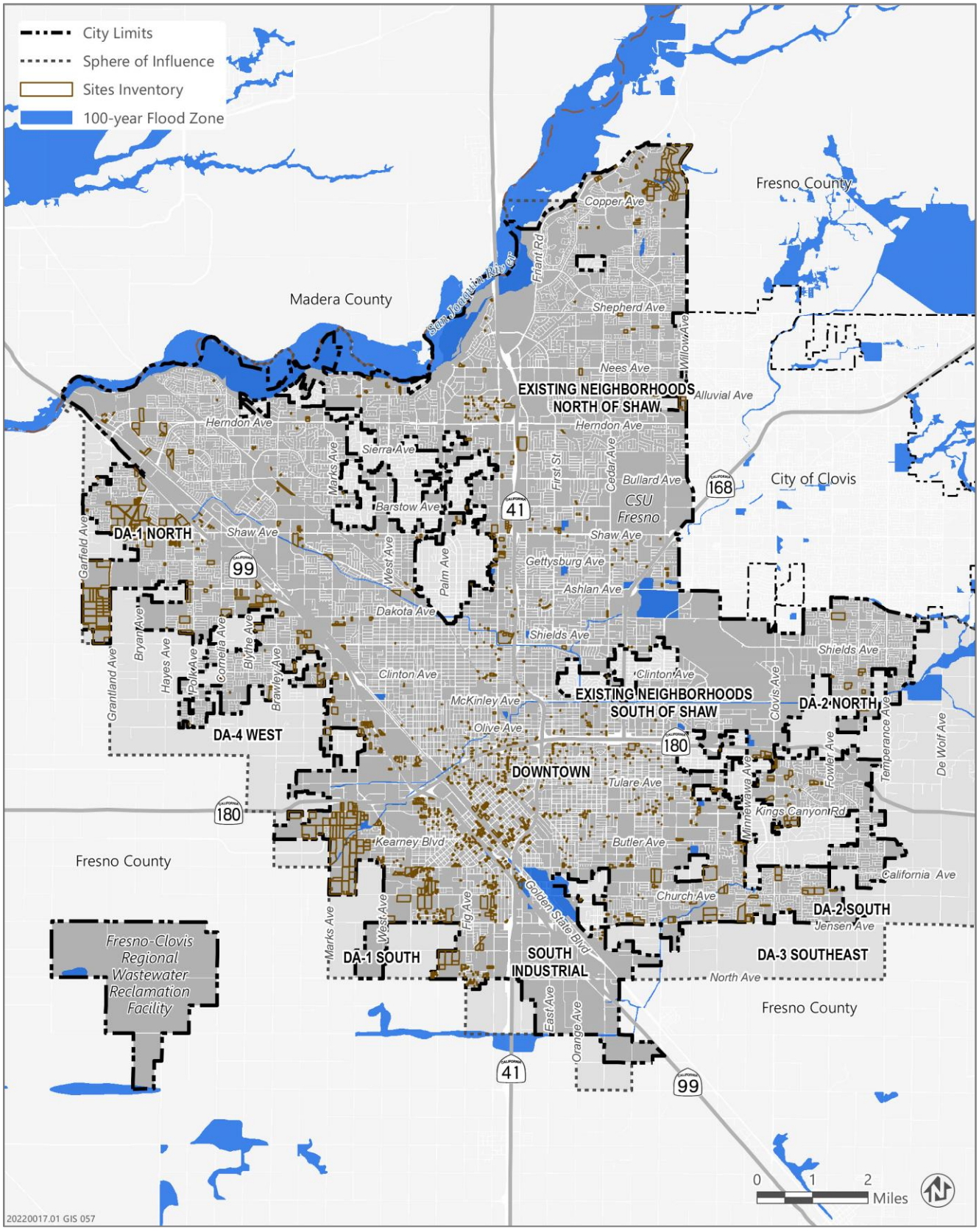
In terms of other potential constraints, a small portion of the city north of Cooper Avenue is within a Military Training Flight Route, where there are a few above moderate and lower-income sites in the inventory. The City is required to send development applications under training routes to the military for review and comment. The military then reviews the development application for compatibility with surrounding military activities and submits any comments to the City. This process would not preclude development on these sites and the referral process has not resulted in delays or other barriers to development.

Wildfire threats are minimal in the city, as the city lacks steep topographies and is largely urbanized or made up of working agricultural land. The city is not located within a very high fire hazard severity zone and therefore no sites in the Housing Element are at risk.

Williamson Act contracts, which allow local governments to enter into contracts with private landowners for the purpose of restricting specific parcels of land to agricultural or related open space use is another potential constraint to residential development. However, none of the sites in the inventory have Williamson Act contracts.

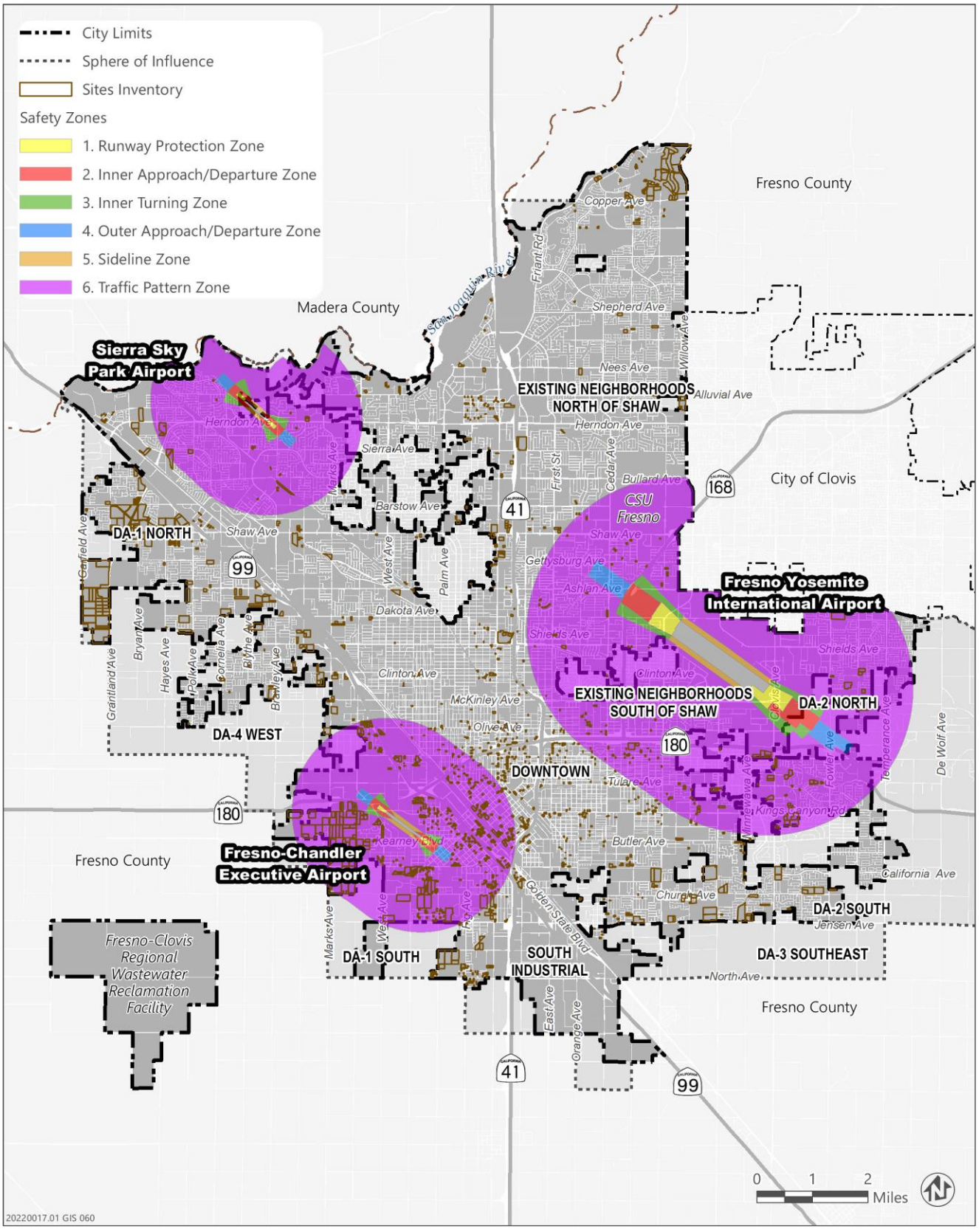
There are no other known environmental constraints or conditions within the city that could preclude development on identified sites within the planning period, including hazards, and related land use controls, shape, access, property conditions, contamination, easements, or overlays. However, there are some areas with existing industrial uses, specifically in Southwest Fresno, that are transitioning to facilitate more residential and mixed use development. Based on public comments, the City closely reviewed sites in this area and removed sites that would be most impacted by existing industrial uses during the Housing Element planning period.

Figure 1E-2.8: Environmental Constraints and Hazards, 100-year Flood Zones, Fresno 2023



Source: City of Fresno and Ascent, October 2023.

Figure 1E-2.9: Environmental Constraints and Hazards, Airport Safety Zones, Fresno 2023



Source: City of Fresno and Ascent, October 2023.

Financial Resources

The City utilizes several sources of funding to assist in the provision of quality housing to lower-income residents (see **Table 1E-2.16** and **Table 1E-2.17** for a list of available funding mechanisms in Fresno). Several funding programs from the U.S. Department of Housing and Urban Development (HUD) allow the City to fund community development and housing activities. The City of Fresno receives federal funding as an entitlement jurisdiction for the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME) program, Emergency Solutions Grant (ESG), and Housing for Persons with HIV/AIDS (HOPWA) funds from HUD. **Table 1E-2.16** shows funds received through these programs for the years 2019 through 2022. On average the City received about $7 million in CDBG, $3.3 million in HOME, $600,000 in ESG, and nearly $700,000 in HOPWA funds during this timeframe.

The City also received Permanent Local Housing Allocation (PLHA) in 2020 and 2021 and Homeless Housing Assistance and Prevention (HHAP) in 2020 through 2022. Other one-time sources of funding in recent years included CARES Act, American Rescue Plan funds, and Encampment Resolution funds to prevent, prepare for, and respond to the spread of COVID-19 during the pandemic; prevent eviction; and address homeless encampments and emergency shelter.

Affordable housing developers are eligible for several federal and state funding programs. Three of the most significant programs include the Low-Income Housing Tax Credit (LIHTC) program, Affordable Housing and Sustainable Communities (AHSC) program, and Project Homekey.

Created by the 1986 Tax Reform Act, the LIHTC program has been used in combination with City and other resources to encourage new construction and rehabilitation of rental housing for lower-income households. The program provides investors an annual tax credit over a 10-year period, provided that the housing meets the following minimum low-income occupancy requirements: 20 percent of the units must be affordable to households at 50 percent of AMI or 40 percent of the units must be affordable to those at 60 percent of AMI. The total credit over the 10-year period has a present value equal to 70 percent of the qualified construction and rehabilitation expenditure. The tax credit is typically sold to large investors at a syndication value.

The AHSC program, funded through the State's Cap and Trade program, provides an additional source of funding for affordable housing. This program awards funding to both public and private entities to build transit-oriented affordable housing and supporting transportation infrastructure, such as pedestrian improvements and bike lanes. The program awards are determined with a points formula; 0.25 points are awarded to projects which directly implement a policy in a long-range planning document (e.g., General Plan, Specific Plan), including new development on sites contained within the housing element's sites inventory.

Project Homekey leverages a combination of federal and state funding streams to provide grant funding to projects that will provide interim or permanent housing options for people experiencing homelessness or who are at risk of severe illness from COVID-19. This program awards funding to public entities for the acquisition and rehabilitation of a variety of housing types – including hotels, motels, vacant apartment buildings, and residential care facilities. Funding is allocated by region based on the region's proportionate shares of people experiencing homelessness (indicated by 2021 Homeless Point-in-Time Counts) and severely cost-burdened extremely low-income households.

Table 1E-2.16: Housing Funding Resources, City of Fresno, 2019-2022

Funding Program	2019	2020	2021	2022	Average	Description
Community Development Block Grant (CDBG)	$6,942,458	$7,112,639	$7,184,218	$6,839,072	**$7,019,597**	Fair housing, public services, senior paint program, owner-occupied rehab, park improvements, neighborhood street improvements, micro enterprise, section 108 loan repayment
HOME Investment Partnerships (HOME)	$3,037,353	$3,255,075	$3,289,681	$3,625,073	**$3,301,796**	Affordable housing development, CHDO, TBRA
Emergency Solutions Grant (ESG)	$585,863	$610,018	$606,586	$603,908	**$601,594**	Outreach/emergency shelter, homeless prevention, rapid rehousing, HMIS
Housing for Persons with HIV/AIDS (HOPWA)	$564,747	$636,124	$714,258	$875,943	**$697,768**	Services for low-income persons living with HIV/AIDS and their families
Permanent Local Housing Allocation (PLHA)	-	$3,407,603	$5,296,470	-	**$4,352,037**	Affordable housing development, first time homebuyer assistance, home repair (mobile homes)
Homeless Housing Assistance and Prevention (HHAP)	-	$6,158,246	$2,911,171	$7,524,257	**$5,531,225**	Shelter services and street outreach
Community Development Block Grant CARES Act (CDBG-CV)	-	$7,980,086	-	-	**N/A**	Shelter operations, medical clinic investments, medical clinic operations, tenant/landlord counseling, shelter acquisition/conversion/rehab
Emergency Solutions Grant CARES Act (ESG-CV)	-	$10,948,953	-	-	**N/A**	Deposit assistance, shelter operations, street outreach, HMIS
HOME American Rescue Plan (HOME-ARP)	-	-	$11,922,873	-	**N/A**	Affordable housing development, supportive services, acquisition, and development of non-congregate shelters
Low Income Housing Trust Fund (LHTF)	-	-	$5,000,000	-	**N/A**	Affordable housing development
American Rescue Plan Act (ARPA)	-	-	$14,200,000	-	**N/A**	Affordable housing development and landlord incentives
Encampment Resolution Funding (ERF)	-	-	-	$5,070,058	**N/A**	Encampment resolution and shelter

Source: City of Fresno and Ascent, 2022

Table 1E-2.17: Other Financial Resources and Programs

Program Name	Description	Eligible Activities
Federal Programs		
Community Development Block Grant (CDBG)	Grants administered and awarded by the state on behalf of the United States Department of Housing and Urban Development (HUD) to cities through an annual competitive process.	Acquisition Rehabilitation Homebuyer Assistance Economic Development Infrastructure Improvements Homeless Assistance Public Services
HOME Investment Partnership Act Funds	Flexible grant program for affordable housing activities awarded by the state on behalf of HUD to individual cities through an annual competitive process.	Acquisition Rehabilitation Homebuyer Assistance New Construction
Section 8 Rental Assistance Program	Rental assistance payments to owners of private market-rate units on behalf of very low-income families.	Rental Assistance
Section 203(k)	Single-family home mortgage program allowing acquisition and rehabilitation loans to be combined into a single mortgage.	Land Acquisition Rehabilitation Relocation of Unit Refinancing of Existing Indebtedness
State Programs		
Emergency Shelter Grant Program	Program funds to rehabilitate and operate emergency shelters and transitional shelters, provide essential social services, and prevent homelessness	Support Services Rehabilitation Transitional Housing Supportive Housing
Rural Development Loans and Grants	Capital financing for farmworker housing. Loans are for 33 years at 1 percent interest. Housing grants may cover up to 90 percent of the development costs of housing. Funds are available under the Section 515 (Rental Housing), Section 502 (Homeownership Loan Guarantee), Section 514/516 (Farm Labor Housing), and Section 523 (Mutual Self-Help Housing) programs.	Purchase Development/Construction Improvement Rehabilitation
Multifamily Housing Program (MHP)	Deferred payment loans for new construction, rehabilitation, acquisition, and preservation of permanent and transitional rental housing.	New Construction Rehabilitation Acquisition Preservation

Program Name	Description	Eligible Activities
California Housing Finance Agency (Cal HFA) Residential Development Loan Program	Low interest, short-term loans to local governments for affordable infill, owner-occupied housing developments. Links with CalHFA's Down Payment Assistance Program to provide subordinate loans to first-time buyers. Two funding rounds per year	New Construction Rehabilitation Acquisition
California Housing Finance Agency (Cal HFA) Homebuyer's Down Payment Assistance Program	The Forgivable Equity Builder Loan gives first-time homebuyers a head start with immediate equity in their homes via a loan of up to 10% of the purchase price of the home. The loan is forgivable if the borrower continuously occupies the home as their primary residence for five years.	Homeowner Assistance
Low-Income Housing Tax Credit (LIHTC)	Tax credits are available to persons and corporations that invest in low-income rental housing. Proceeds from the sale are typically used to create housing.	New Construction Rehabilitation
California Self-Help Housing Program	Grants to cities and nonprofit developers to offer homebuyer assistance, including down payment assistance, rehabilitation, acquisition/rehabilitation, and homebuyer counseling. Loans to developers for property acquisition, site development, predevelopment, and construction period expenses for homeownership projects	Predevelopment, Site Development, Site Acquisition Rehabilitation Acquisition/rehab Down Payment Assistance Mortgage Financing Homebuyer Counseling
Tax Exempt Housing Revenue Bond	Supports low-income housing development by issuing housing tax-exempt bonds requiring the developer to lease a fixed percentage of the units to low-income families at specified rental rates.	New Construction Rehabilitation Acquisition
Affordable Housing Sustainable Communities Program (AHSC)	This program provides grants and/or loans, or any combination, that will achieve GHG emissions reductions and benefit Disadvantaged Communities through increasing accessibility of affordable housing, employment centers, and key destinations via low-carbon transportation.	New Construction
Local Programs		
Habitat for Humanity Greater Fresno Area	Homeownership through sweat equity. Homeowners also receive counseling and training on homeownership and maintenance. Homeowners buy their completed homes from Habitat for Humanity and repay them over 30 years through an affordable mortgage.	Homebuyer Assistance Homebuyer Counseling

Program Name	Description	Eligible Activities
Fresno County Housing Assistance Rehabilitation Program (HARP)	Provides loans to eligible low and moderate income homeowners to rehabilitate their affordable homes in the unincorporated area and partner cities to bring the homes up to current building code health and safety standards. Loans are currently zero interest with affordable monthly payments based on the family's income.	Rehabilitation
Fresno County Rental Rehabilitation Program (RRP)	Provides loans to eligible rental housing owners with low-/mod-income tenants, to rehabilitate affordable rental units in the unincorporated area and partner cities, to bring the rental units up to current building code health and safety standards. Loans are zero interest and amortized over 20 to 30 years (with a balloon payment at 20 years), based upon the income of the rental-housing owner and the case flow of the rental project	Rehabilitation
Fresno County Homebuyer Assistance Program (HAP)	Provides homebuyer down payment and mortgage assistance loans to enable eligible low- and moderate-income families to purchase their first home in the unincorporated area and partner cities. Homes to be purchased must meet current building code health and safety standards. Loans are zero interest with payments deferred for 30 years or until the primary mortgage is fully paid, whichever occurs first.	Homebuyer Assistance
Fresno County Affordable Housing Development Program (AHDP)	Provides gap-financing loans to nonprofit organizations and other eligible developers to construct new affordable housing, including multi-family rental housing projects and single-family owner-occupied housing projects. May also be used to substantially rehabilitate existing affordable housing projects.	New Construction Rehabilitation
Fresno County Mobilehome Park Program (MPP)	Provides zero-interest loans to help finance the preservation of affordable mobile home parks and development of new affordable mobile home parks.	New Construction Acquisition and Preservation
Private Resources/Lender/Bank Financing Programs		
Federal National Mortgage Association (Fannie Mae) Community Homebuyers Program	Fixed rate mortgages issued by private mortgage insurers.	Homebuyer Assistance
	Mortgages that fund the purchase and rehabilitation of a home.	Homebuyer Assistance Rehabilitation
	Low down payment mortgages for single-family homes in underserved low-income and minority cities.	Homebuyer Assistance

Program Name	Description	Eligible Activities
California Community Reinvestment Corporation (CCRC)	Nonprofit mortgage banking consortium designed to provide long-term debt financing for affordable rental housing. Nonprofit and for-profit developers contact member banks.	New Construction Rehabilitation Acquisition
Federal Home Loan Bank Affordable Housing Program	Direct subsidies to nonprofit and for-profit developers and public agencies for affordable low-income ownership and rental projects.	New Construction
Freddie Mac	Home Works: Provides first and second mortgages that include rehabilitation loan. County provides gap financing for rehabilitation component. Households earning up to 80% MFI qualify	Homebuyer Assistance combined with rehabilitation
Northern California Community Loan Fund (NCCLF)	Offers low-interest loans for the revitalization of low-income communities and affordable housing development	Acquisition Rehabilitation New Construction
Low-Income Investment Fund (LIHF)	Provides below-market loan financing for all phases of affordable housing development and/or rehabilitation.	Acquisition Rehabilitation New Construction

Source: City of Fresno and Ascent, June 2023.

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SECTION 1E-3: LOCAL ASSESSMENT OF FAIR HOUSING

Introduction

Land use policies and planning directly impact the ability of individuals and families to live in neighborhoods that offer high levels of opportunity. This includes access to high-performing schools, availability of jobs, and safe convenient access to transit and services. Despite the long-standing federal mandate established by the Fair Housing Act (FHA)[1] – which prohibits discrimination concerning the sale, rental, and financing of housing based on race, color, religion, national origin, sex, familial status, and disability status – people within protected classes continue to encounter limits in housing choice and mobility.

Background

Government Code Chapter 15 Section 8899.50, signed into law in 2018 under Assembly Bill (AB) 686, requires all public agencies in California to "administer its programs and activities relating to housing and community development in a manner to affirmatively further fair housing (AFFH), and take no action that is materially inconsistent with its obligation to affirmatively further fair housing." Under California law, AFFH means "taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics."[2]

This means cities and counties are required to take deliberate actions to address disparities in housing needs, access to opportunity, and settlement patterns for protected populations. Consistent with Government Code Section 65583, housing elements are required to address the following components:

- **Inclusive and Equitable Outreach:** Local jurisdictions must make a diligent effort to equitably include all community stakeholders in the housing element participation process.
- **Assessment of Fair Housing:** All housing elements must include an assessment of integration and segregation patterns and trends, racially or ethnically concentrated areas of poverty, disparities in access to opportunity, and disproportionate housing needs, including displacement risk.
- **Analysis of Sites Inventory:** Local jurisdictions must evaluate and address how particular sites available for housing development will meet the needs of households at all income levels. The housing element must analyze and conclude whether the identified sites improve or exacerbate conditions for fair housing.

[1] 42 U.S.C. §§ 3601-3631

[2] California Department of Housing and Community Development, *Affirmatively Furthering Fair Housing: Guidance for All Public Entities and for Housing Elements (April 2021 Update)*, April 27, 2021, preface page, https://www.hcd.ca.gov/community-development/affh/docs/affh_document_final_4-27-2021.pdf.

- **Identification of Contributing Factors:** Based on findings from the previous steps, housing elements must identify, evaluate, and prioritize the contributing factors related to fair housing issues.
- **Policies and Actions to Affirmatively Further Fair Housing:** Local jurisdictions must adopt fair housing goals and actions that are significant, meaningful, and sufficient to overcome identified patterns of segregation and affirmatively further fair housing. The housing element should include metrics and milestones for evaluating progress and fair housing results.

Outreach

As part of the Multi-Jurisdictional Housing Element update process, the City hosted and participated in a variety of outreach efforts. The purpose of outreach was to solicit feedback from local stakeholders and members of the community to inform the assessment of housing needs and program development. This Assessment of Fair Housing includes a summary of outreach activities conducted through the process. A full summary of outreach efforts for the Multi-Jurisdictional Housing Element update can be found in Chapter 2, Public Outreach and Engagement.

Study Sessions

A study session was held with the City Council on September 15, 2022, to discuss the Housing Element Update and process. The study session was open to the public and held in person, with a livestream option to reach members of the public who could not attend in person. Commentary was limited and no public comment related to fair housing was received at the meeting; instead, commissioners and council members expressed concern regarding the implications of new and changing housing legislation on small cities with limited financial resources.

Community Workshops and Meetings

The City held a number of community workshops and meetings to solicit feedback from the community and stakeholders on the Housing Element update. In addition to the workshops and consultations facilitated with California Coalition of Rural Housing (CCRH) and Fresno Council of Governments (FCOG), the City worked with a local nonprofit with roots in the community, Every Neighborhood Partnership (ENP), to conduct supplemental outreach to solicit as much input as feasible to inform the update to the Housing Element. Workshops and meetings were conducted throughout the span of the project, starting in August of 2022. A series of joint community meetings were then held by the City of Fresno Long Range Planning and Housing Divisions between October 27 and November 28, 2022. Several additional meetings were held in February and March of 2023. More information about the City's diligent efforts to engage with the public, and summaries of the feedback received, are described in more detail in Section 1E-6: Public Outreach and Engagement.

The City notified the community with flyers distributed in English, Spanish, Hmong, and Punjabi through the FCOG listserv of regional stakeholders and community based organizations (CBOs) and through Fresno Housing. Linguistica interpreters were available for Spanish, Hmong, and Punjabi monolingual speakers. Materials in Spanish, Hmong and Punjabi were available in-person at several workshops and then online at the project website, accessible via link or QR code.

More than 250 community participants attended the City's workshops and meetings for the Housing Element update. The following describes some of the most relevant themes and feedback received.

- **Critical Housing Issues.** Community members expressed that some of the most critical issues in Fresno are related to lack of affordability and frequently changing housing costs, infrastructure needs, lack of information and education, and lack of community amenities.
- **Most Impacted Groups.** Participants identified a number of special needs groups that are most impacted by housing needs such as residents with low- and extremely low- incomes, undocumented residents, people experiencing homelessness, seniors, single-parent households, people with disabilities and mental disabilities, and college students/youth.
- **Fair Housing Needs.** When asked about Fresno's most significant fair housing issues, participants noted historical disinvestment in southwest and west Fresno, inability to access credit, housing costs, and access to opportunities. Some of the suggestions for programs to include in the Housing Element include: more landlord education and incentives for Housing Choice Vouchers (HCVs), regular roundtable meeting with community leaders, and better promotion of ongoing/current information via social media.
- **Suggestions and Solutions.** Participants expressed support for building more affordable housing and suggested the City develop more programs to provide financial assistance to low-income families, funding to rehabilitate homes, rent control, and more housing near amenities like grocery stores. Participants also made suggestions for increasing community involvement in the Housing Element update.

Following the workshops, the City posted copies of the workshop presentations on the Fresno County Multijurisdictional Housing Element Update website in multiple languages for residents to access at their convenience. Feedback received during the workshops was used to inform this assessment as well as associated programs. For a full summary of the workshops, see Section 1E-6, Public Outreach and Engagement.

Regional Focus Groups

As described in Chapter 2 of the Multi-Jurisdictional Housing Element, two regional focus groups were held as part of the Housing Element development process. Stakeholders included representatives from FCOG member jurisdictions including County of Fresno, City of Fresno, City of Clovis, City of Fowler, City of Parlier, City of Sanger, and City of Selma. Other organizations and stakeholder represented at the focus groups include California Apartment Association (CAA), California Rural Legal Assistance (CRLA), Envision Realty, Northern California Carpenters Council (NCCRC), Building Industry Association (BIA), Fresno Housing, The Fresno Center, and We Plan Cities.

Participant groups were presented with information about the Housing Element process, particularly sections regarding community needs and fair housing, and were given the opportunity to weigh in on community needs. Some key topics that came up as regional housing issues include: corporate acquisition of mobile home parks, lack of reliable access to water and other infrastructure such as internet access and cell phone reception, over-reliance on commercially zoned property to accommodate RHNA (not much higher density zoning in the County relative to commercial), outdated community plans hindering development, and difficulties securing funding for new housing in low resource areas. There was also a fair amount of discussion on the need for more outreach and education to increase awareness/accessibility of existing assistance programs, and financial literacy to help low-income residents better compete for affordable housing/home ownership opportunities. Attendees highlighted the gap between program eligibility and the ability to afford available housing, as some applicants to affordable housing programs make too much money to qualify but still can't afford housing without the program's assistance. At a recent workshop for community members interested in participating in a down payment assistance program, none of the attendees qualified because their incomes were higher than 80 percent of the area median income. For other community members, being able to show an income level of at least twice the rent of an apartment in the area is impossible.

During one of the focus group meetings, a participant referenced the Llaves de tu Casa Inciativa which is a financial education program open to all County of Fresno residents but with a focus on increasing Latino homeownership rates. The partners driving the initiative are NAHREP (National Association of Hispanic Real Estate Professionals) Fresno, the City of Fresno, Federal Home Loan Bank (FHLBank) of San Francisco, Self-Help Enterprises, and Union Bank. The Llaves De Tu Casa Iniciativa program consists of down payment and closing cost assistance, home buyer grants, comprehensive home buyer education and counseling including first-time home buyer workshops and flexible mortgage products and programs for Fresno neighborhoods. As a follow-up to the regionwide stakeholder focus groups, a group of initiative members representing various organizations and companies met to discuss housing needs and programs for the regional Housing Element effort.

Regional and Local Stakeholder Consultations

To ensure that the City solicits feedback from all segments of the community, consultations were conducted with service providers and other stakeholders who represent different socioeconomic groups. Throughout the summer and fall of 2022, several interviews were conducted with stakeholders who work in areas such as housing, homelessness, and other social services in Fresno and throughout the Fresno County area.

The following organizations and stakeholders provided one-on-one input or written feedback on housing needs and programs in Fresno. Note, this is not an extensive list of all of the organizations and stakeholders that participated in the process of the Housing Element update.

- Leadership Counsel for Justice and Accountability
- Central Valley Urban Institute
- Resources for Independence Central Valley
- Law Office of Patience Milrod – Civil Rights Attorney

- BIA of Fresno/Madera Counties
- Fair Housing Council of Central California (FHCCC)
- Fresno Housing
- Fresno-Madera Continuum of Care
- Llaves De Tu Casa Inciativa
- Nor Cal Carpenter's Union

In each consultation, stakeholders were asked about: opportunities and concerns for housing in the region, housing needs by type, barriers and unmet needs, constraints, and housing conditions. Stakeholders were also asked about equity and fair housing such as "What factors limit or deny civil rights, fair housing choice, or equitable access to opportunity? What actions can be taken to transform racially and ethnically concentrated areas of poverty into areas of opportunity (without displacement)? What actions can be taken to make living patterns more integrated and balanced?"

Common themes in stakeholder responses were concerns about affordability, including the location of affordable housing in undesirable areas and the gap between housing affordability and program income limits. Limited capacity and resources include funding, time, staff, infrastructure, labor supply etc. The opportunities and suggestions for future housing in the region that stakeholders proposed are local rent controls to manage affordability and reduce displacement risk, code enforcement to ensure a safe and habitable housing stock, taking advantage of State incentives to build more housing in high opportunity areas, funding fair housing groups such as FHCC to enforce fair housing laws, establishing a land trust, acknowledging a labor shortage in residential construction, and adjusting regulations or encouraging development of a variety of unit types and sizes throughout the jurisdiction to promote mobility and integration.

Stakeholders also highlighted the unique needs of community members who are undocumented including how it is impossible to achieve homeownership and challenging to have the required proof of income for rental housing. Several stakeholders identified lack of credit and low incomes as a barrier to many residents in accessing stable housing. The following describes some of the themes and feedback from the consultations.

- **Opportunities and Concerns.** Stakeholders described the rising cost of housing, the shortage of affordable housing available in the city, increasing rates of homelessness, sprawl in the city, infrastructure, the need for multifamily or single-family unit types, not enough accessible units for people with disabilities, substandard housing conditions, and insufficient code enforcement as concerns. Stakeholders noted that some opportunities include: availability of vacant land, repurposing old buildings into housing, tools for process streamlining, more incentives, proactive code enforcement, and requirements for inclusionary development.
- **Housing Barriers/Needs.** Stakeholders described housing costs, inaccessibility of listings, and credit checks as barriers for residents to get into housing. Stakeholders also expressed that there has been insufficient progress toward meeting the lower-income Regional Housing Needs Allocation (RHNA) referring to units for low-, very low-, and extremely low-income households (i.e., not enough affordable housing being built). Most of the stakeholders encouraged the City to provide more funding for home repairs and maintenance. Stakeholders noted the economic disadvantages to market rate developers to build affordable housing and identified processing times and general costs as significant constraints.

- **Equity and Fair Housing.** Stakeholders encouraged the City to proactively AFFH and incorporate fair housing into Housing Element programs. In terms of factors that limit or deny civil rights, fair housing choice, and/or equitable access to opportunities, stakeholders noted access to credit, deposit and income requirements, language barriers, lack of inclusionary housing requirements, and poor financial education. Someone also noted that previous evictions and criminal records create barriers to equity. Lastly, stakeholders described how fringe/sprawl development patterns have resulted in disproportionate resources and opportunities.
- **Other Topics and Suggestions.** Some of the other key topics that came up were the increased costs and competition for housing due to COVID, the need for long term rental assistance in Fresno, infrastructure costs and water accessibility, inclusionary housing, code enforcement, community land trusts, mobile home park protections, and capacity building for lower income residents and nonprofits/community-based organizations. Stakeholders encouraged the City to include specific programs and timelines with designated responsible parties.

Fair Housing Assessment

This section serves as an assessment of fair housing practices in the city of Fresno and has been prepared pursuant to Government Code Section 65583 (c)(10). It examines existing conditions and demographic patterns including patterns of integration and segregation within the city, concentrated areas of low- and moderate-income housing, and areas of low and high opportunity. Information on Fresno is also compared to regional trends, describing settlement patterns across the Central Valley. The analysis is primarily based on data from the U.S. Census American Community Survey (ACS), the HCD AFFH Tool, and the City's Analysis of Impediments to Fair Housing Choice (Draft – February 2020). A regional assessment of Fair Housing in Fresno County is provided in Chapter 3: Regional Assessment of Fair Housing.

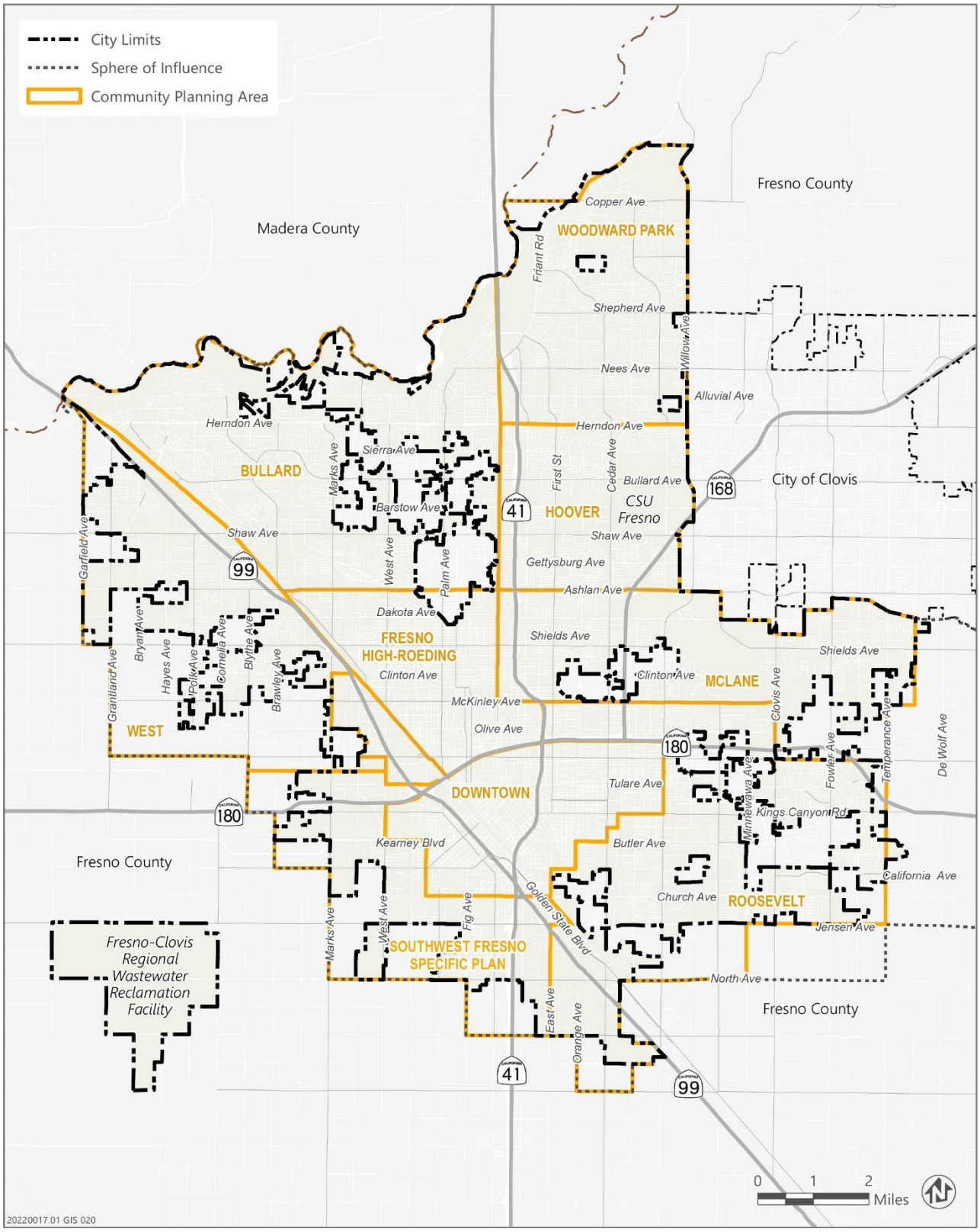
This section is organized by fair housing topics. For each topic, the regional assessment is first, followed by the local assessment. Strategies to address the identified issues are included throughout the section. This section also includes an analysis of the Housing Element sites inventory as compared with fair housing factors. Through discussions with housing service providers, fair housing advocates, and this assessment of fair housing issues, the City of Fresno identified factors that contribute to fair housing issues. These contributing factors along with associated actions are included in **Table 1E-3.28,** Summary of Fair Housing Issues, Contributing Factors, and Meaningful Actions to AFFH. Additional programs to affirmatively further fair housing are included in Section 1E-1: Action Plan.

Notes on Geospatial Analysis

In this report, “neighborhoods” are approximated by an aggregation of census tracts. Census tracts are statistical geographic units defined by the U.S. Census Bureau for the purposes of disseminating data. Throughout this report, neighborhood level segregation measures are calculated using census tract data. However, some data is reported at the census block or census block group (block groups) level. Fresno County is used as the primary point of comparison for regional trends. References to the “Central Valley” refer to the San Joaquin basin within Fresno County.

Figure 1E-3.1 displays a neighborhood map for the city of Fresno. Throughout this document, the following neighborhood names will be used to generally categorize census tract or block group data. This report uses an expansive definition of Downtown. The General Plan directed that the Downtown Planning Area be further refined through specific and community plans which include the plan areas for the Downtown Neighborhood Community Plan and the Southwest Fresno Specific Plan. While these areas are functionally similar, these neighborhoods vary culturally, rich with strong communities such as the city’s historic Chinatown.

Figure 1E-3.1: Neighborhood Map, City of Fresno



Source: City of Fresno, 2022.

Patterns of Integration and Segregation

Race and Ethnicity

As described in the Regional Multi-Jurisdictional Housing Element (Chapter 3), the racial and ethnic representation of residents in the County set the baseline, and closely correspond to those in the city of Fresno. Countywide, the majority of the population in most jurisdictions is Hispanic (of any race). Similarly, the city of Fresno's Hispanic population constitutes nearly half of all residents (49.7 percent). Countywide and within the city, Hispanic representation has grown significantly since the 2000 Census. In real numbers, the Hispanic population increased from 170,520 people to 261,751 over the 20-year timeframe, a 53.5 percent increase (see **Table 1E-3.1**).

Table 1E-3.1: Population by Race and Hispanic Origin, Fresno, 2000-2020

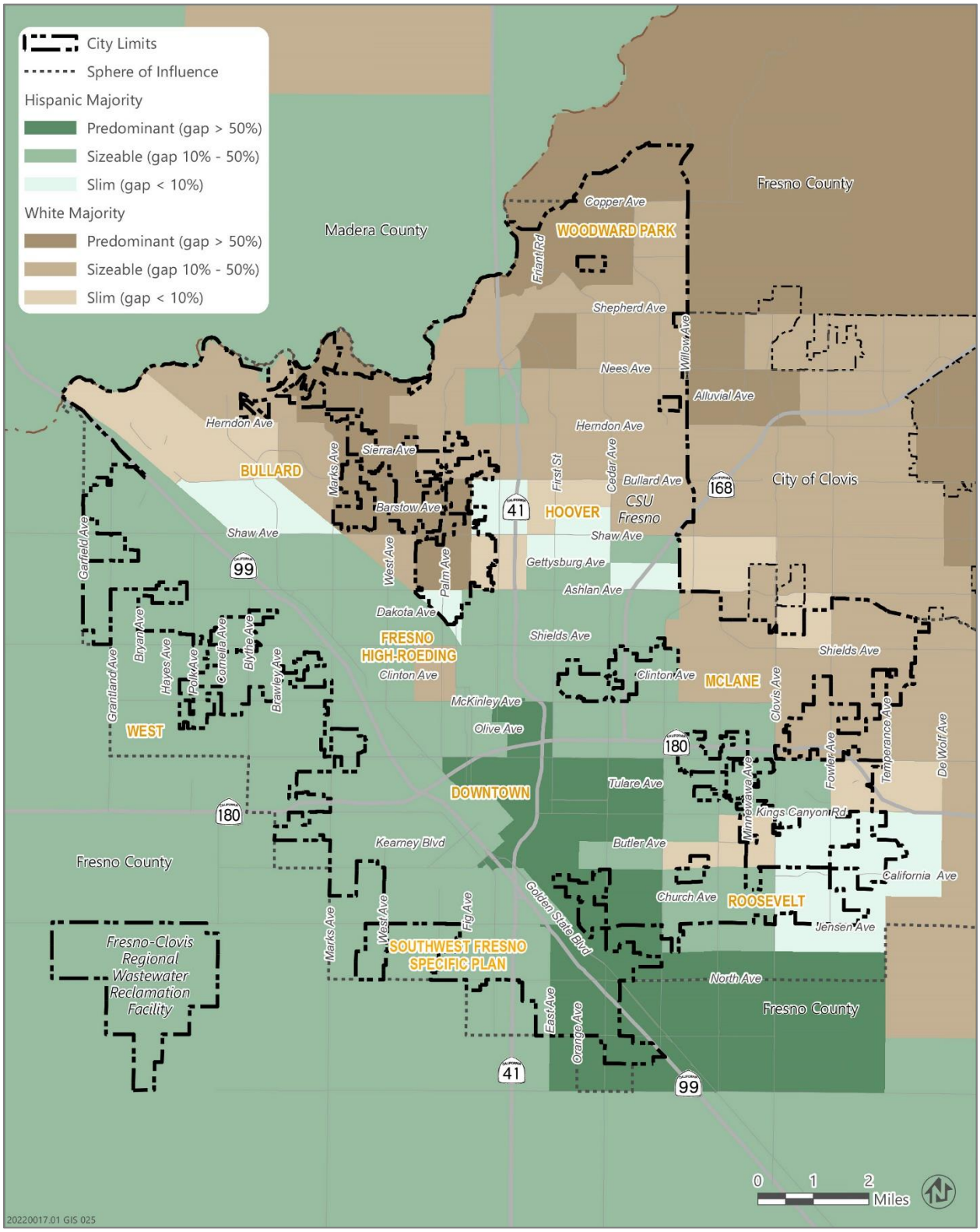
	2000		2010		2020	
	Number of People	Percent	Number of People	Percent	Number of People	Percent
White	159,473	37.3%	148,598	30.0%	137,216	26.1%
Black or African American	34,357	8.0%	37,885	7.7%	36,089	6.9%
American Indian and Alaska Native	3,259	0.8%	3,127	0.6%	2,445	0.5%
Asian	47,136	11.0%	60,939	12.3%	73,892	14.0%
Native Hawaiian and Other Pacific Islander	427	0.1%	663	0.1%	726	0.1%
Some Other Race	728	0.2%	984	0.2%	1,026	0.2%
Two or More Races	11,752	2.7%	10,414	2.1%	13,002	2.5%
Hispanic or Latino	170,520	39.9%	232,055	46.9%	261,751	49.7%
Total	**427,652**		**494,665**		**526,147**	

Source: U.S. Census Bureau, ACS16-20 and ACS05-10 (5-year Estimates), Table B03002. U.S. Census Bureau, 2000 Decennial Census Table H007.

Residents identifying as White are the second largest population segment in the city of Fresno, comprising a quarter of the city's total population. Since 2000, the percentage of the city's White population has decreased, from 159,473 people (37.3 percent of the city) in 2000 to 137,216 (26.1 percent) in 2020. Asian or Pacific Islanders comprise Fresno's third largest population segment, making up 14.0 percent of the city, roughly similar to their 2000 population share of 11.0 percent. From 2000 to 2020, Fresno gained an additional 26,700 Asian or Pacific Islander residents. During this 20-year timeframe, the city also experienced a decrease in Black or African American residents and Native American residents.

Figure 1E-3.2 displays the distribution of households in Fresno by race and Hispanic origin. While Fresno's population is relatively evenly distributed throughout the city, the spatial distribution of the population indicates considerable levels of segregation by race and ethnicity. As shown in the figure, Hispanic residents are more concentrated in the southern half of the city, specifically in the Downtown, while neighborhoods in the northern half of the city have a greater predominance of White residents.

Figure 1E-3.2: Population by Race and Hispanic Origin, Fresno, 2019



Source: Data downloaded from HCD AFFH Data and Mapping Tool in 2021, based on 2015-2019 American Community Survey data.

The dissimilarity index provides another measure of the magnitude of segregation within a city or county. The dissimilarity index measures the degree to which two specific groups are distributed across a geographic area. The score varies between 0 and 100 and measures the percentage of one group that would have to move across neighborhoods to be distributed the same way as the second group. A dissimilarity index of 0 indicates conditions of total integration under which both groups are distributed in the same proportions across all neighborhoods. A dissimilarity index of 100 indicates conditions of total segregation such that the members of one group are located in completely different neighborhoods than the second group. For example, if an index score is above 60, more than 60 percent of people in the specified area would need to move to eliminate segregation. The following can be used to interpret the index:

- Less than 40: Low Segregation
- Between 40 and 54: Moderate Segregation
- Greater than 55: High Segregation

Table 1E-3.2 displays the dissimilarity index scores in the city compared to the county. It is important to note that the dissimilarity index uses White residents as the primary comparison group. That is, all dissimilarity index values compare racial and ethnic groups against the distribution of White residents and do not directly measure segregation between two minority groups (e.g., Black or African American, and Hispanic/Latino segregation). The dissimilarity index scores are intended to contextualize the level of segregation between racial and ethnic groups city- and countywide. As shown below, the dissimilarity index for Black or African American residents is 0.49 in this city. This would mean that nearly half of Black or African American (or White) residents would need to move to a different neighborhood to achieve balance in the demographics.

Table 1E-3.2: Dissimilarity Index Scores for City of Fresno and Fresno County, 2020

Race/Ethnicity	City of Fresno	Fresno County
American Indian/Alaska Native	0.66	0.66
Asian	0.39	0.41
Pacific Islander	0.79	0.82
Black or African American	0.49	0.54
Hispanic/Latino	0.39	0.45
Other	0.73	0.72
Multiracial/ Two or More Races	0.33	0.31
Total Non-White Population vs. White	0.36	0.40

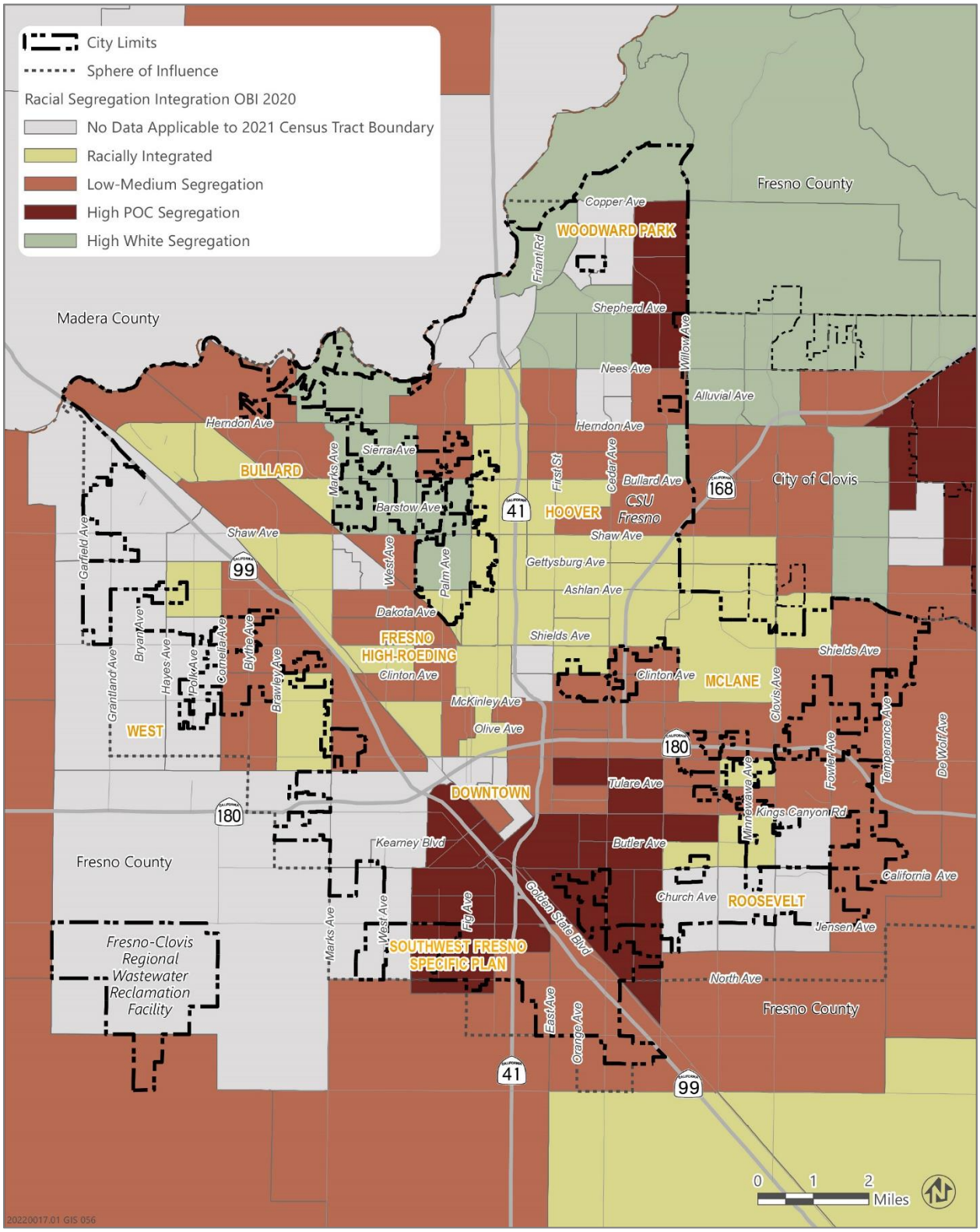
Source: U.S Census ACS 5-Year Estimates, 2020, Table B03002.

As discussed previously, White, and Hispanic/Latino groups comprise the majority of the population in the city (77.2 percent). The dissimilarity index shows that there is a low magnitude of segregation between these respective groups (0.39). This is comparable, but lower, than patterns countywide (0.45). The dissimilarity index also shows that the highest levels of segregation within the city are between Pacific Islander (0.79), American Indian/Alaska Native (0.66) and other racial/ethnic groups not listed (0.73). However, when calculating and analyzing the dissimilarity index, it is important to note that dissimilarity index values are less reliable for a population group if that group represents less than 5 percent of the jurisdiction's total population, approximately. Scores are innately higher because there is a smaller population size relative to the total.

Asian residents on the other hand account for 14 percent of the city's total population and the dissimilarity index score between Asian and White residents is 0.39 which is the same as the score between White and Hispanic/Latino groups. These scores are below the threshold of 0.40 which would indicate lower levels of segregation amongst the city's census tracts based on numerical statistics. The dissimilarity index scores for the total Non-White population indicate that the county as a whole has moderate and higher levels of racial/ethnic segregation, with dissimilarity index scores of 0.36 and 0.40, in the city and county respectively.

Figure 1E-3.3 below visualizes racial segregation/integration measures based on methodology from the Othering & Belonging Institute (OBI) and 2021 census tract boundaries. OBI's data compares integrated neighborhoods to highly segregated White neighborhoods and highly segregated neighborhoods that are predominantly populations of color (POC). In the figure below, South Fresno stands out with the highest POC segregation. While there are more tracts in northern Fresno with highly segregated White neighborhoods (shown in green below), there are two census tracts in the Woodward Park area that are classified with high POC segregation. The central core of established neighborhoods surrounding the Shaw Avenue corridor are more racially integrated with most neighborhoods on the outskirts of those neighborhoods experiencing low to medium segregation (as indicated by the yellow cluster in the central core and lighter red color surrounding those tracts in **Figure 1E-3.3**). It is worth noting that several census tracts throughout the city do not have data assigned to them. This includes tracts in the Woodward Park, West, Downtown, and Roosevelt areas.

Figure 1E-3.3: Racial Segregation/Integration by Census Tract, City of Fresno



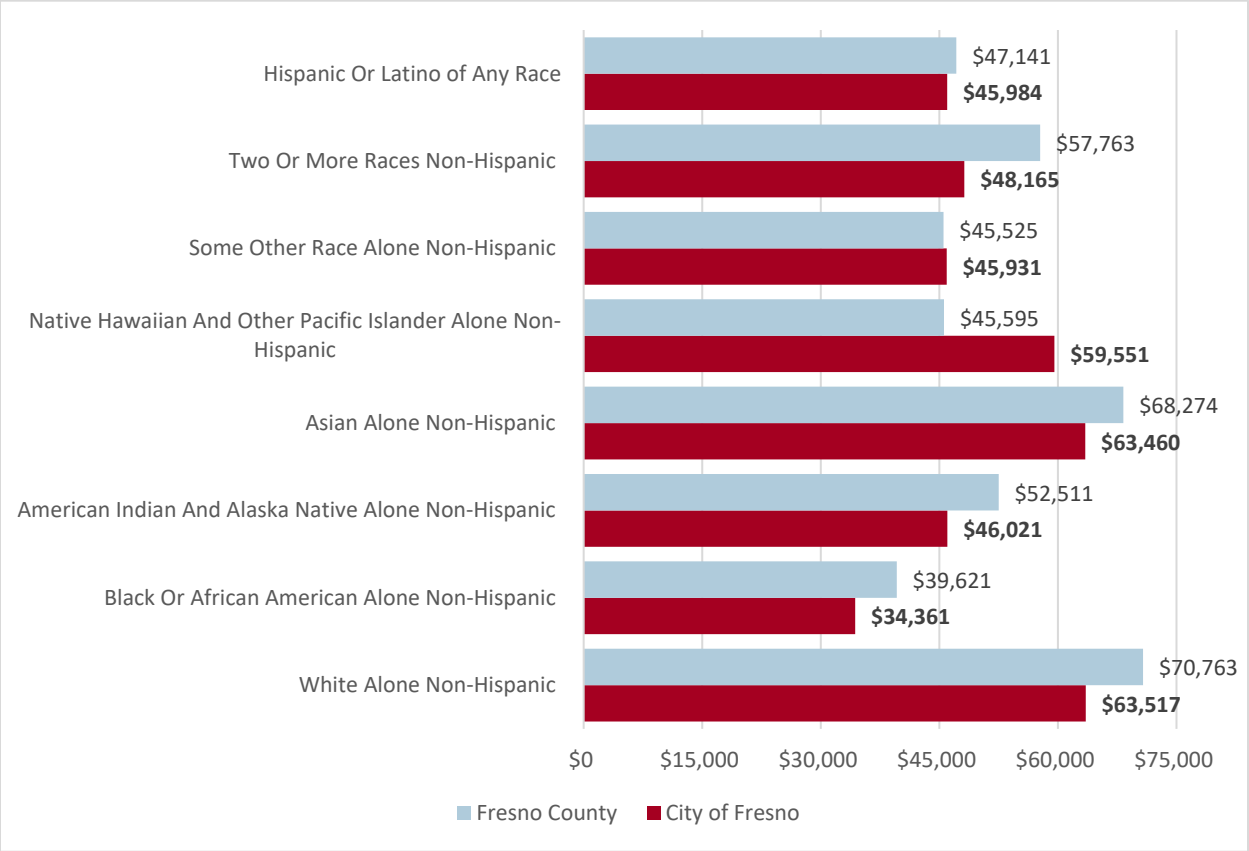
Source: Data downloaded from HCD AFFH Data and Mapping Tool 2.0 in 2023, based on 2021 census tract boundaries and data from the Othering & Belonging Institute 2020.

Income Distribution

In 2020, Fresno's citywide median household income was $53,368 which was below the Fresno County median income of $57,109 and the statewide median income of $78,672. Median incomes by racial group, shown below in **Figure 1E-3.4**, vary greatly. White and Asian households had median incomes that are very close at $63,517 and $63,460 respectively. Hispanic households had a median income that was approximately $17,500 less than White and Asian households at $45,984 while Black or African American households had the lowest median household income at $34,361. These trends are also displayed for the whole of Fresno County where Hispanic households had a median income of $47,141 compared to $70,763 for White households and $68,274 for Asian households while Black or African American households had a median income of $39,621.

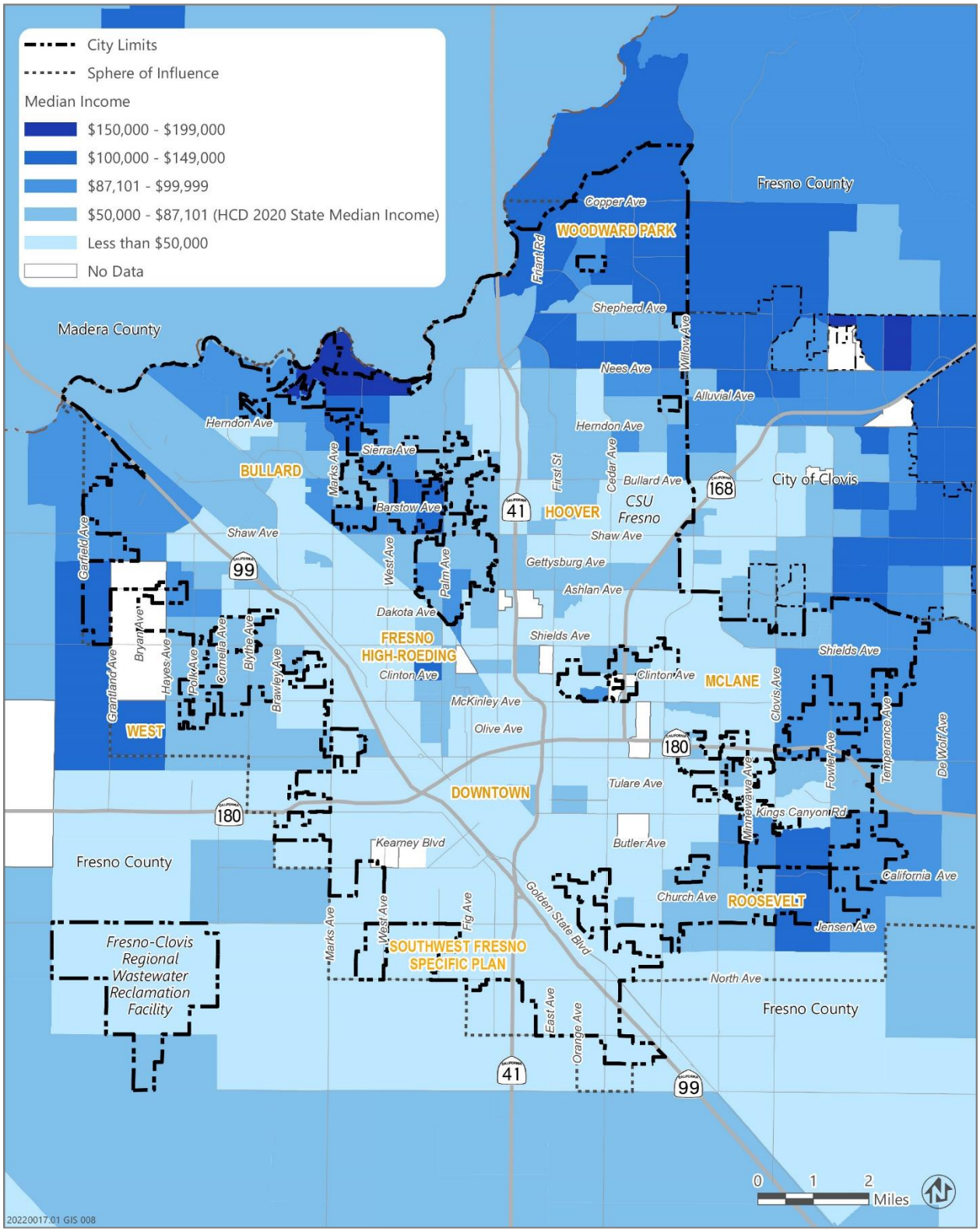
Figure 1E-3.5 displays the distribution of households in the city by median household incomes. North, northwest, west, and east neighborhoods of the city, including portions of the Woodward Park, Bullard, West, and Roosevelt community areas, have the highest median incomes relative to the rest of the city. Census block groups that most closely match the city's median incomes ($50,000-$87,100) and are generally in line with the statewide average median income of $78,672, are located in between the highest and lowest median income neighborhoods. While the city's average annual median income was $53,368, most of the city has incomes that are less than $50,000. Compared to the trends in residential integration and segregation shown in **Figure 1E-3.3** above, incomes tend to be lowest where there is "low to medium segregation" and "high POC segregation," particularly in Downtown and inner core neighborhoods, such as west Fresno adjacent to SR 99, south Fresno, Jane Addams and Jefferson. Residents in high poverty areas tend to have lower levels of access to opportunity due to the absence of critical resources and disinvestment in their communities. As poverty increases, disparities in access to opportunities often increase among population groups and disadvantaged communities become even more isolated.

Figure 1E-3.4: Median Household Income by Race, Fresno, 2020



Source: U.S. Census Bureau, ACS16-20 (5-year Estimates), Table B19013.

Figure 1E-3.5: Median Household Income, Fresno, 2019

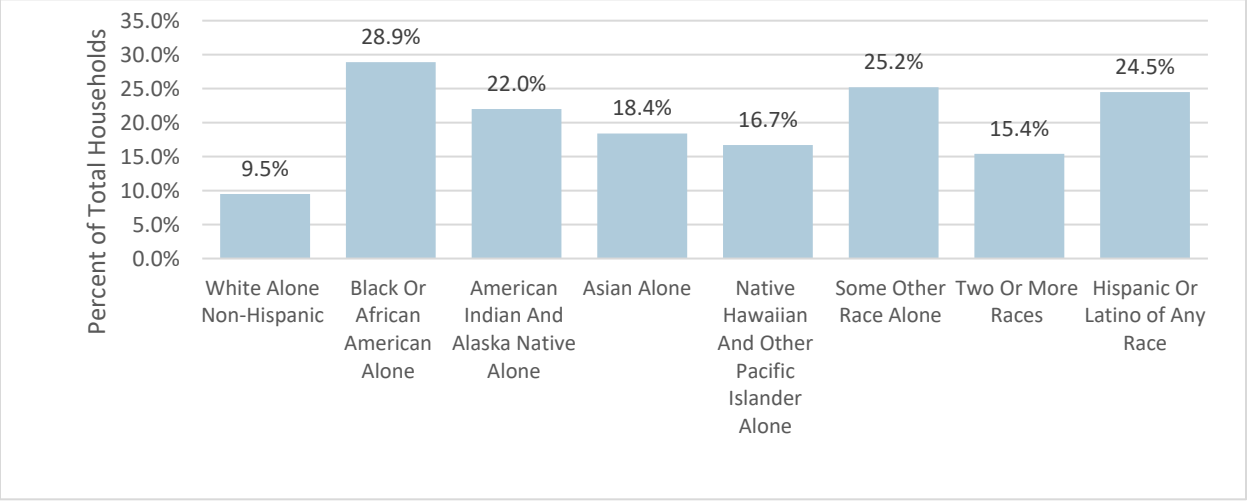


Source: Data downloaded from HCD AFFH Data and Mapping Tool in 2021, based on 2015-2019 American Community Survey data.

The Area Median Income (AMI) for Fresno County is $80,300 in 2022. In 2022, a family of four making $27,750 or less would be classified as extremely low income in Fresno. In the city of Fresno, 15.8 percent of households make less than 30 percent of the AMI, which is considered extremely low income. This income equates to a wage of $14.76 per hour for a single wage-earner, which is below the minimum wage in Fresno ($15.50 per hour). An extremely low-income family of four described above could afford a monthly housing cost of approximately $694. As reported in the regional assessment of fair housing, only 7.0 percent of units in the city of Fresno rent for less than $1,000 monthly, while 54.0 percent rent for $1,001 to $1,500 monthly, 30.0 percent rent for $1,501 to $2,000 monthly, and 10.0 percent rent for above $2,000 monthly, making it very hard for extremely low-income families to afford housing and support themselves.

As such, most block groups in the city have high levels of poverty on average than other cities in the state, and the overall poverty rate in Fresno is 19.2 percent. Despite Fresno being the country's most agriculturally productive region, it has become known for its high levels of poverty and unemployment.[3] There are large disparities among racial and ethnic groups with regard to poverty (see **Figure 1E-3.6).** Black or African American, "Other Race," and Hispanic populations experience the greatest rates of poverty in Fresno, while the White population has the least amount of poverty (less than 10 percent) among all population groups. Exposure to poverty varies by location in the city, with some areas of the city experiencing higher rates of poverty than others. Specifically, block groups in south and west Fresno tend to have higher exposure to poverty, while the city's northernmost block groups have relatively low levels of poverty (see **Figure 1E-3.7**).

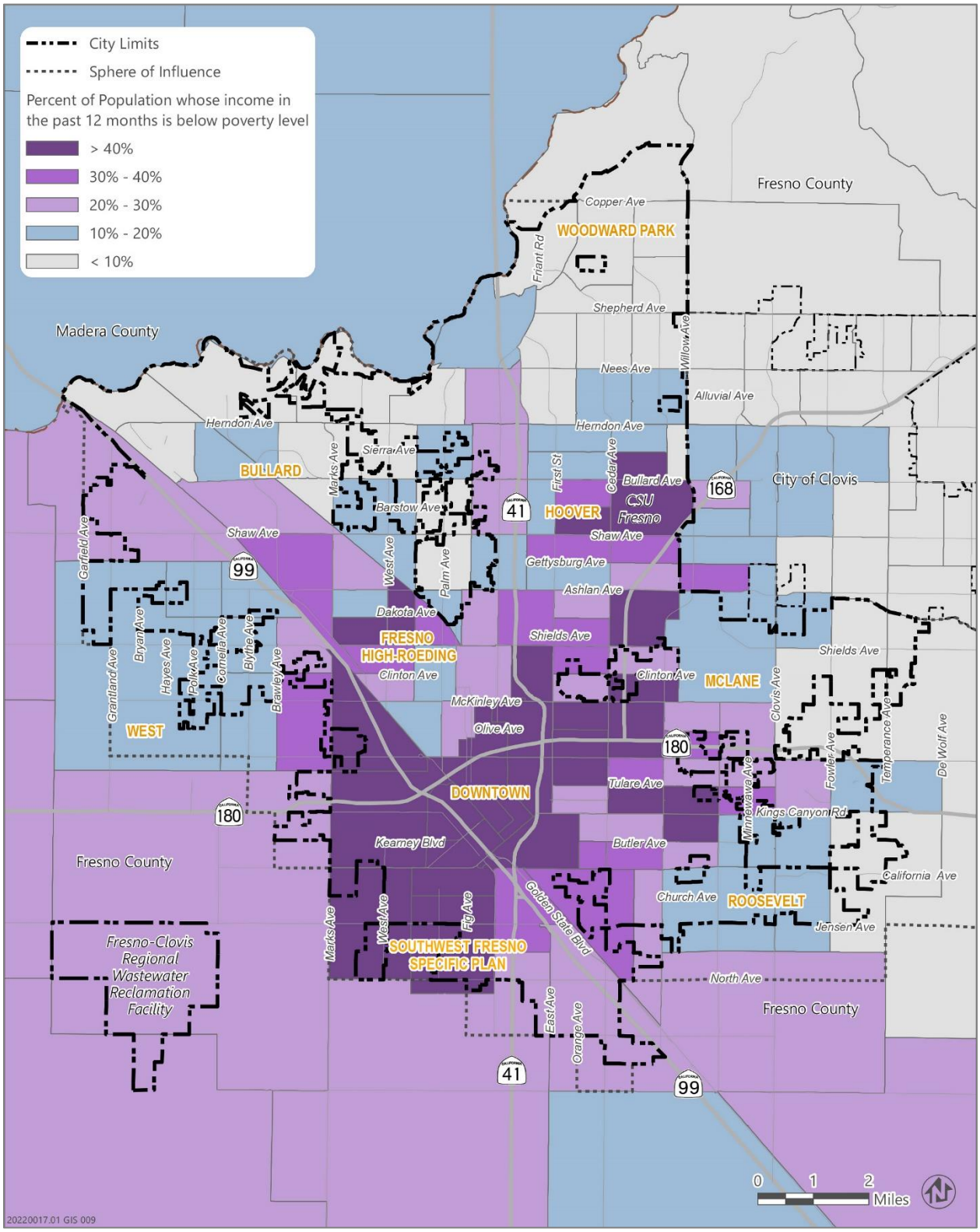
Figure 1E-3.6: Percent of Households in Poverty by Race or Hispanic Origin, Fresno, 2020



Source: U.S. Census Bureau, ACS16-20 (5-year Estimates), Table B17010A.

3 Benner, C. and Pastor, M. 2015. Equity, Growth, and Community: What the Nation Can Learn from America's Metro Areas. "Struggle and the City: Conflict-Informed Collaboration." University California Press. Pp. 130-160. Accessed via: https://www.jstor.org/stable/10.1525/j.ctt1ffjnd4.9.

Figure 1E-3.7: Distribution of Poverty, Fresno, 2019



Source: Data downloaded from HCD AFFH Data and Mapping Tool in 2021, based on 2015-2019 American Community Survey data.

Familial Status

The FHA also bans discrimination based on "familial status," which refers to the presence of at least one child under 18 years old. Housing discrimination based on familial status can occur when a landlord, property manager, real estate agent, or property owner treats someone or a group of people differently because they have a family with children under the age of 18. In Fresno County, the majority of households are family households (72.3 percent). Family households are defined by California law as a household of two or more people, regardless of relationship status. Approximately 67.8 percent of households in the city of Fresno are family households including 40.7 percent married couple households, 9.4 percent of households that are unmarried cohabitating couples, and an additional 17 percent of households with alternative compositions such as single-parent households.

As shown in **Table 1E-3.3**, 34.3 percent of households in the city had a child under the age of 18 according to ACS. Since 2000, the overall share of families with children in the city of Fresno has declined by 22.1 percentage points despite an increase in the number of families overall. A similar decline occurred at the regional level, where families with children decreased from 55.8 percent of all households in 2000 to 35.4 percent in 2020, despite gaining over 30,000 additional families with children.

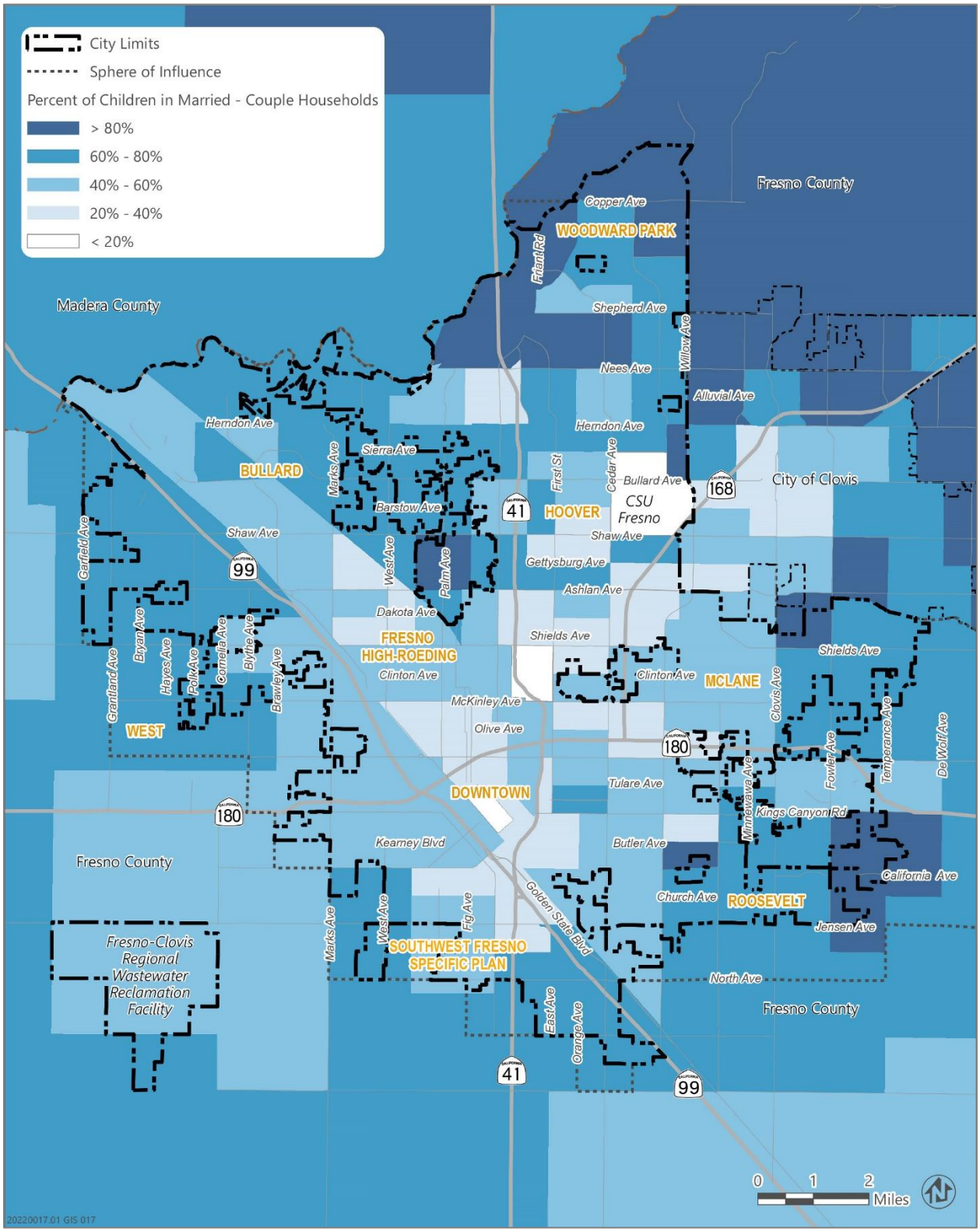
Table 1E-3.3: Families with Children, Fresno, 1990-2020

	Number of Families	Percent of all Households	Number of Families	Percent of all Households	Number of Families	Percent of all Households
	2000		2010		2020	
City of Fresno	44,690	56.4%	59,626	53.0%	58,288	34.3%
Fresno Region	79,423	55.8%	112,139	52.3%	109,759	35.4%

Source: Decennial Census, ACS. 2020 Analysis of Impediments to Fair Housing Choice. U.S. Census Bureau, ACS16-20 (5-year Estimates), Table B11012.

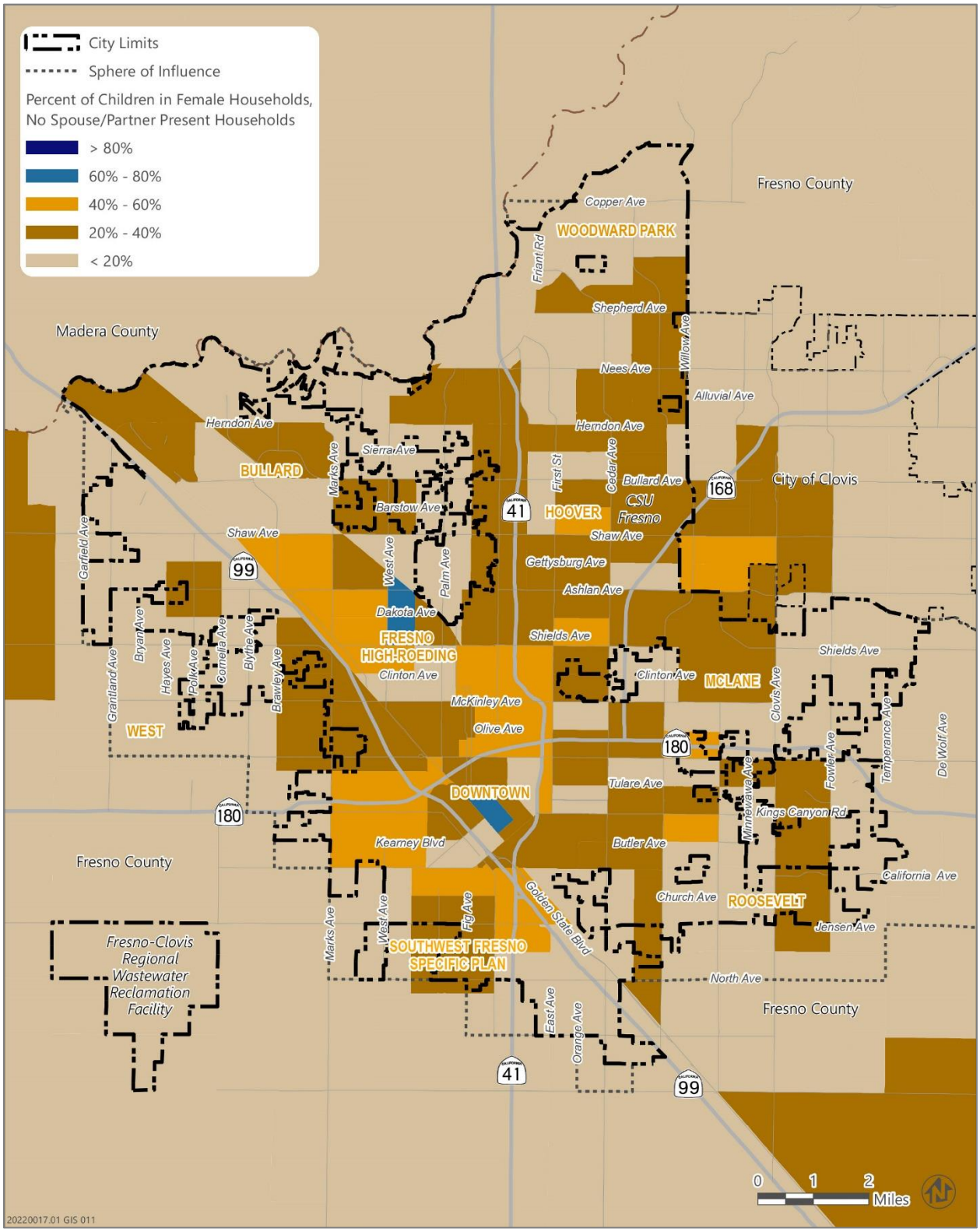
Figure 1E-3.8 shows the distribution of children in married couple households, while **Figure 1E-3.9** shows the distribution of children in female-headed households with no partner or spouse present. Most of Fresno County has moderate to high rates of children in married-couple households especially in the unincorporated county areas. Generally, throughout the San Joaquin Valley, areas where residences are typically more dispersed and uses are more agricultural or limited by topography have higher rates of families with children than is found in the central and southern neighborhoods of the city of Fresno. Within the city, there is a greater presence of children living in married couple households in the west and northwest neighborhoods. The inner city near Downtown has smaller populations of children living in married couple households.

Figure 1E-3.8: Percent of Children in Married Couple Households, Fresno, 2019



Source: Data downloaded from HCD AFFH Data and Mapping Tool in 2021, based on 2015-2019 American Community Survey data.

Figure 1E-3.9: Percent of Children in Single-Female Headed Households, Fresno, 2019



Source: Data downloaded from HCD AFFH Data and Mapping Tool in 2021, based on 2015-2019 American Community Survey data.

As described in the Regional Assessment of Fair Housing (Chapter 3 of the Multi-Jurisdictional Housing Element), female-headed households tend to live in and around the cities of Fresno and Clovis. This could be due to the proximity of schools, transit, services, and jobs in an incorporated city; however, the urban areas of the county also have a greater range of housing types that single-female headed households can afford. While female-headed households compose 30.7 percent of households in the city overall, there are several neighborhoods where they are the predominant household type. As shown in **Figure 1E-3.9**, there are several tracts in Fresno, predominantly along State Route 41, State Route 99 and State Route 180, with proportions of female-headed households that comprise 40 to 80 percent of the total households. Female-headed households are also predominant in the Woodward Park area in northern Fresno, the neighborhood areas in the east bordering old town Clovis (generally surrounding Clovis Avenue), and the Roosevelt community area in southern Fresno surrounding Kings Canyon Road and California Avenue.

Female-headed households have special housing needs because they tend to be either single-parents or single-elderly adults that are living on low- or poverty-level incomes. In 2021, According to the U.S. Department of Justice, Office of Juvenile Justice, 9.5 percent of children living with two parents lived below the poverty level, compared to 31.7 percent of children living with a single parent. Children living with only their mothers in 2021 were more than twice as likely to live in poverty than those living with only their fathers (35.0 percent vs. 17.4 percent)[4]. Comparing **Figures 1E-3.8** and **1E-3.9** with **Figures 1E-3.5** and **1E-3.7**, a connection can be made to higher concentrations of single parent households and higher poverty levels and lower median incomes in Fresno. Single-parent households with children often require special consideration and assistance as a result of their greater need for affordable housing, accessible day care, health care, and a variety of other supportive services. Because of their relatively lower household incomes, single-parent households are more likely to experience difficulties in finding affordable, decent, and safe housing and the presence of a child in the household tends to receive unequal treatment in the rental housing market. Fresno ranks fourth worst among the 50 most populous U.S. cities for the percentage of single mothers with an income below the poverty line (63.1 percent). Single mothers in this city can expect to spend 31.8 percent of their income on rent annually.[5]

Population with Disabilities

The U.S. Census Bureau defines disability as one of the following: hearing difficulty, vision difficulty, cognitive difficulty, ambulatory difficulty, self-care difficulty, and independent living difficulty. Persons with disabilities tend to have lower fixed-incomes, higher health care costs, and special housing needs. Persons with disabilities typically have special housing needs because of their physical and/or developmental capabilities, fixed or limited incomes, and higher health costs associated with their disabilities.

[4] Office of Juvenile Justice and Delinquency Prevention. 2022. "Poverty status of children by family structure." Accessed via: https://ojjdp.ojp.gov/statistical-briefing-book/population/faqs/qa01203#:~:text=In%202021%2C%209.5%25%20of%20children,17.4%25

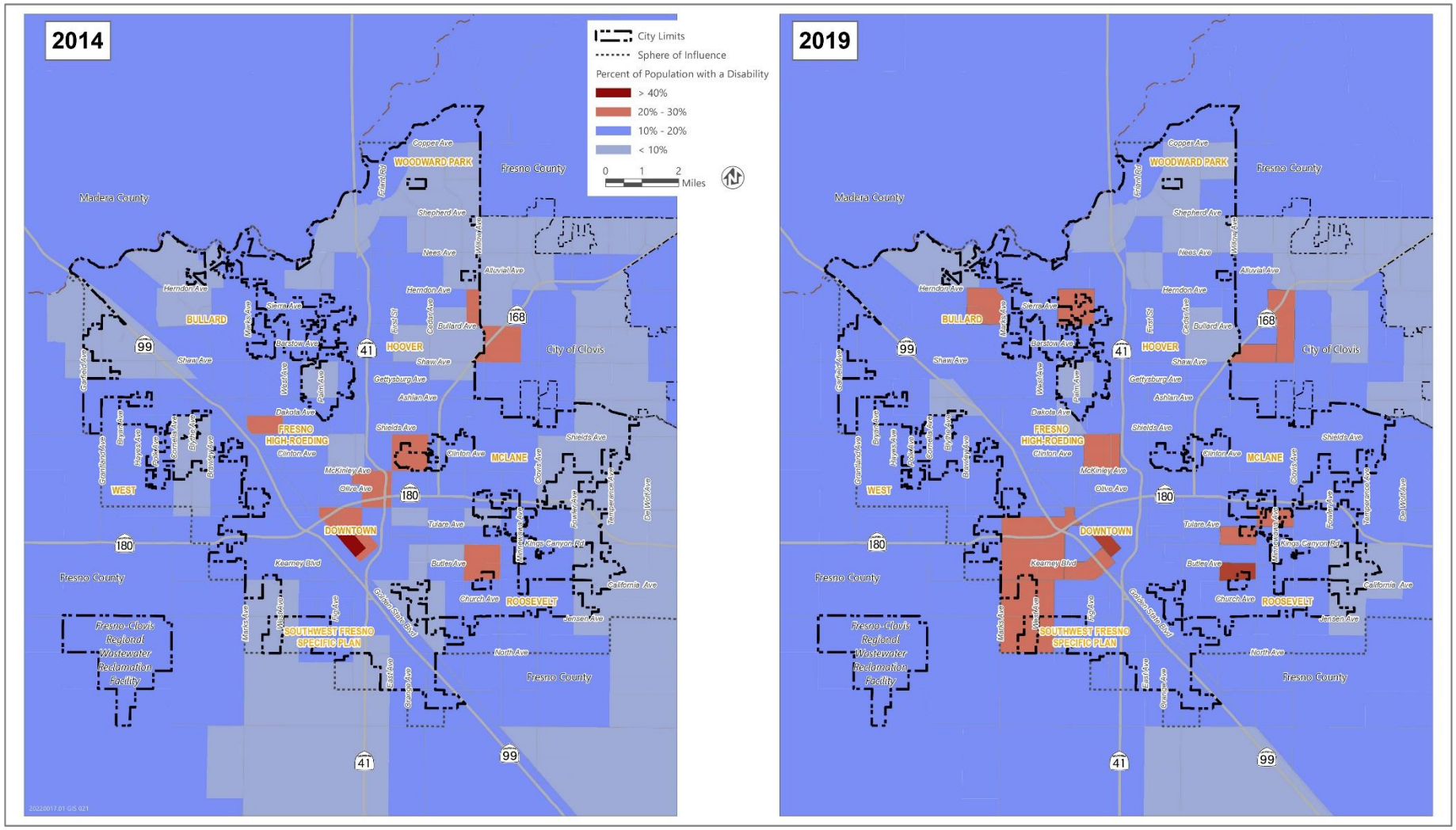
[5] Solum, A. 2022. "Where Single Mothers Fare Worse Economically – 2022 Study." Accessed via: https://smartasset.com/data-studies/where-single-mothers-fare-worse-economically-2022

According to 2016-2020 ACS 5-Year Estimates, 14.3 percent of Fresno's population has a disability, which is slightly higher than the county rate of 13.0 percent. By disability type, the city is similar to the region, with ambulatory difficulties being the most prevalent disability type (affecting 50.1 percent of the city of Fresno population and 49.7 percent of the regional population with one or more types of disability). Cognitive and independent living difficulties are the next most prevalent, affecting 44.0 percent and 39.5 percent of the disabled population. Smaller percentages of the population are affected by hearing difficulties, vision difficulties, and self-care difficulties.

Figure 1E-3.10 shows the population of persons with a disability by census tract in the city using ACS data from 2015-2019. As stated in the Regional Assessment of Fair Housing (Section 3 of the Multi-Jurisdictional Housing Element), the only areas in Fresno County having a concentration of persons with a disability over 20 percent are in the cities of Fresno and Clovis, suggesting a correlation between housing opportunities for seniors in more urbanized areas with access to public transportation, services, and amenities. The other jurisdictions in Fresno County either contain a population of which less than 10 percent of the population reports a disability, or the jurisdiction is split between areas of less than 10 percent, and 10 to 20 percent of the households experiencing one or more disabilities. Within Fresno, households with a disability have higher concentrations in southwest Fresno, the Fresno High-Roeding neighborhood in central Fresno, the McLane neighborhood west of the airport, and a small tract of the Bullard neighborhood. These areas correlate with the neighborhoods with supportive housing and assisted care facilities for seniors and others that may require supportive housing.

Fresno residents with disabilities are served by the Fresno County Senior Resource Center, which operates an Adult Protective Services program, assisting both disabled adults and seniors with all requests for assistance. The Fresno County Human Services System Department of Adult Services also provides housing and basic needs assistance to elderly persons. The Fresno/Madera Area Agency on Aging (FMAAA) provides connections to programs, services, and resources elderly residents can use to maintain and improve their quality of life as they age.

Figure 1E-3.10: Percentage of the Population with a Disability in City of Fresno



Source: Data downloaded from HCD AFFH Data and Mapping Tool in 2021, based on 2010-2014 and 2015-2019 American Community Survey data.

Concentrated Areas of Race and Income

Areas of Poverty

One indicator of segregation is the presence of racially concentrated areas of poverty. Racially or Ethnically Concentrated Areas of Poverty (R/ECAP) are neighborhoods in which there are both racial concentrations and high poverty rates. The Department of Housing and Urban Development's (HUD's) definition of a R/ECAP is:

- A census tract that has a Non-White population of 50 percent or more (majority-minority) or, for non-urban areas, 20 percent, AND a poverty rate of 40 percent or more; OR
- A census tract that has a Non-White population of 50 percent or more (majority-minority) AND the poverty rate is three times the average tract poverty rate for the county, whichever is lower.

Households within R/ECAP tracts frequently represent the most disadvantaged households within a community and often face a multitude of housing challenges. Overrepresentation of Black and Hispanic populations in areas of concentrated poverty can exacerbate racial disparities related to safety, employment, access to jobs and quality education, and conditions that lead to poor health. Areas of concentrated poverty generally have less private investment from financial institutions, grocery stores, and other retail outlets. R/ECAPs are meant to identify where residents may have historically faced discrimination and continue to be challenged by limited economic opportunity. As will be discussed later in the section on Fresno's local history, concentrated areas of poverty today were shaped by various land use practices that were historically used in communities across the nation to spatially segregate neighborhoods, including redlining and racially restrictive covenants.

Figure 3-15 of the regional assessment displays R/ECAPs in the Fresno County region, based on ACS data from 2009-2013. While the region as a whole appears to be fairly integrated economically and racially, concentrated poverty and racial segregation remains a major concern in several communities throughout the San Joaquin Valley. As the largest city in the region, Fresno has the highest number of R/ECAPs. Based on this data, there were 39 census tracts designated as R/ECAPs in the city of Fresno. Approximately 40 percent of Fresno residents live in R/ECAP census tracts. Hispanic residents make up the majority of the population living in R/ECAP tracts. Recalling **Figure 1E-3.2** which shows where predominant concentrations of various racial/ethnic groups live in Fresno and **Figure 1E-3.3** which shows racial segregation/integration, individual R/ECAPS can be linked to census tracts with predominant Hispanic populations where there are high concentrations of POC segregation. Looking at familial status, recalling **Figure 1E-3.9**, more than half of the families living in Fresno's R/ECAP tracts have children.

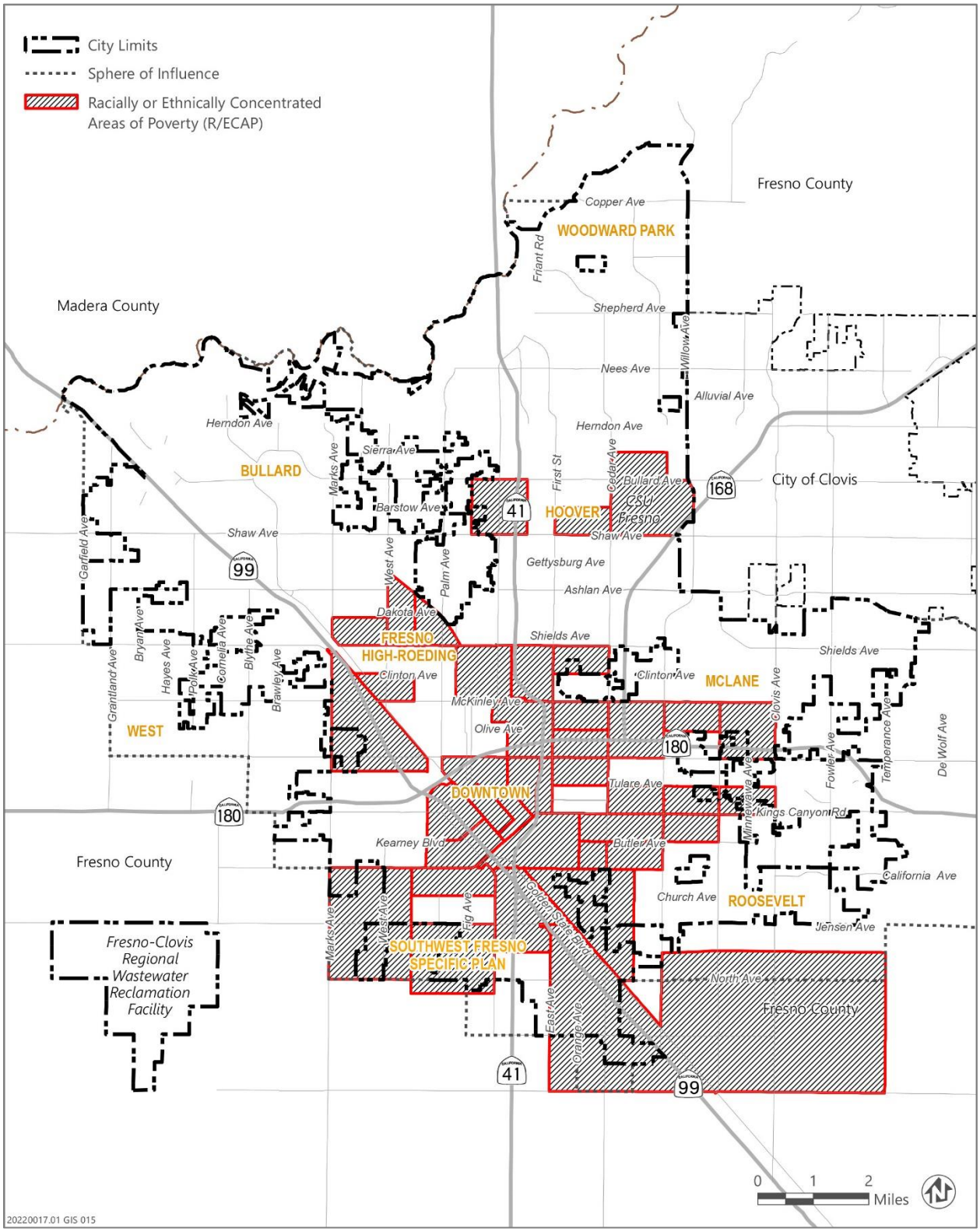
Figure 1E-3.11 displays R/ECAPs in the city of Fresno, based on ACS data from 2009-2013. R/ECAP census tracts cover all Downtown neighborhoods, such as Jane Addams, Edison, Lowell, and Jefferson, as well as west and south Fresno. There are also two R/ECAP census tracts in the Bullard neighborhood of northern Fresno, in or near the campus of Fresno State University. A third isolated R/ECAP in the Bullard neighborhood is located around State Route 41. It is important to note that no newer analysis currently exists that specifically identifies R/ECAPs. For a better understanding of the current landscape, refer to Figure 1E-3.14, which displays the composite analysis of TCAC Opportunity Areas, including areas of "high segregation and poverty." These maps provide more recent insights into areas of concentrated segregation and poverty and are useful for understanding the current landscape.

As will be discussed in more detail in a later section, several policies and historical forces[6] have contributed to the formation of R/ECAPs in Fresno and other communities across the country, including:

- Redlining: The discriminatory practice of denying loans and other financial services to residents of certain areas based on racial or ethnic composition has left lasting impacts on community development and wealth accumulation.[7]
- Discriminatory Housing Practices: Including restrictive covenants, racial steering, and unequal lending practices, which limited where minority populations could live and invest.[8]
- Urban Renewal: Policies aimed at redeveloping urban areas often displaced minority communities, further entrenching segregation and poverty.[9]
- Economic Disparities: Structural economic inequalities, including low engagement in the labor market and wage gaps, have exacerbated poverty levels in these communities.[10]
- Education Inequality: Income disparities and unequal educational resources have perpetuated limited social mobility for residents of R/ECAPs.[11]

[6] San Joaquin Valley Fair Housing and Equity Assessment, 2014. Available via: https://academics.fresnostate.edu/oced/documents/SJV_Fair-Housing-and-Equity-Assessment_April-2014.pdf
[7] Aguilera, D. October 2015. "Rare Maps Reveal Fresno's Overlooked History of Segregation." Accessed via: https://www.kvpr.org/community/2015-10-27/rare-maps-reveal-fresnos-overlooked-history-of-segregation
[8] Ramon D. Chacon, "A Case Study of Ghettoization and Segregation: West Fresno's Black and Chicano Community During the 1970s," Standford Center for Chicano Research. Working Paper Series No. 12 (Jan 1986).
[9] San Joaquin Valley Fair Housing and Equity Assessment, 2014. Available via: https://academics.fresnostate.edu/oced/documents/SJV_Fair-Housing-and-Equity-Assessment_April-2014.pdf
[10] Montalvo, M. December 2022. "Labor leaders sound the alarm about low-wage job growth in California's Central Valley." Accessed via: https://fresnoland.org/2022/12/09/labor-leaders-sound-the-alarm-about-low-wage-job-growth-in-californias-central-valley/
[11] Californians for Justice.

Figure 1E-3.11: Racially/Ethnically Concentrated Areas of Poverty, Fresno, 2013



Source: Data download from the HCD AFFH Mapping tool in 2021. Based on R/ECAP data from HUD and 2009-2013 ACS.

Moreover, there are systemic and structural issues which have contributed to the perpetuation of concentrated poverty including but not limited to: high unemployment rates and low engagement in the labor market, wage gaps, limited social safety nets, and disparities in access to educational resources. Relative to other areas in the city, R/ECAPs in Fresno tend to exhibit the following characteristics:

- Higher percentages of non-White populations (**Figure 1E-3.2**) and medium to high rates of segregation for populations of color (**Figure 1E-3.3**)
- Median incomes less than $50,000 per year (**Figure 1E-3.5**)
- Higher poverty rates (**Figure 1E-3.7**)
- Higher rates of children in single-family households (**Figure 1E-3.9**)
- Lower academic performance and fewer educational resources based on the 2021 TCAC Opportunity Index (**Figure 1E-3.15**)
- Low engagement with the labor market (**Figure 1E-3.17**)
- Poor environmental conditions (**Figure 1E-3.23** through **Figure 1E-3.25**)
- Higher percentages of Housing Choice Voucher usage (**Figure 1E-3.29**)
- Higher rates of overcrowding (**Figure 1E-3.30**) and housing cost burden (**Figure 1E-3.31** and **Figure 1E-3.32**)

In contrast, the communities north of Shaw including Woodward Park, Bullard, and also the McLane community are not characterized as racially or ethnically concentrated areas of poverty. These communities developed in the 1980s amidst construction of the State Route 99, 41, and 180 freeway loops around Downtown. As shown in the demographic analysis above, there is less racial and ethnic diversity in these communities. **Figure 1E-3.3** indicates that these neighborhoods have higher rates of integration as compared to central core neighborhoods. Regarding income distribution, household incomes are generally higher around the northern fringes of the city. In fact, these communities are characterized as racially concentrated areas of affluence. This is described in more detail in the following section.

Furthermore, the built environment, or the physical resources built for the residents of Fresno, can have a significant impact on quality of life. Some ways the built environment can affect quality of life positively include physical activity, good housing conditions, and access to healthy food and healthcare. Physical activity includes walkability, bikeability, park access, and in Fresno's hot summers, tree canopy coverage. Housing conditions can be measured by the level of repair and maintenance needed. Access to healthy foods can include the number of and distance to grocery stores. Healthcare access can include the number of and distance to hospitals, clinics, and doctor's offices. When comparing Fresno's R/ECAPs to Fresno's Racially or Ethnically Concentrated Areas of Affluence (RCAAs – see next section for definition and location) in terms of the built environment the following is known about the quality of life:

- **Walkability:** Based on data from the 2017 Fresno Active Transportation Plan (ATP) there is a much higher percentage of sidewalk gaps in R/ECAPs compared to RCAAs. The gaps in the R/ECAPs occur within existing neighborhoods, in neighborhoods adjacent to freeways, and along major roadways in Southwest Fresno.
- **Bikeability:** Based on data from the ATP, there is a much higher percentage of bikepath gaps in R/ECAPs compared to RCAAs. The gaps in the R/ECAPs occur throughout and are most notable in Downtown Fresno, Southwest Fresno, and the eastern portion of the Fresno High-Roeding.
- **Walkability and Bikeability:** Based on data from the 2017 Fresno Active Transportation Plan there is a much higher percentage of trails in the RCAAs compared to the R/ECAPs. In 2019, the RCAAs had 18 miles of trails and one of those trails, the Fresno Sugar Pine Trail, connects to miles of Clovis trails.
- **Walkability and Bikeability:** In the 2019 Fresno Network Expansion Feasibility Plan, the City evaluated all proposed unfunded trails identified in the ATP based on the Active Transportation Prioritization Tool adopted with the ATP. The criterion included access and equity, connectivity, traffic control, mode shift, and user comfort. The R/ECAPs have 30 segments of needed trails totaling 16.5 miles whereas the RCAAs areas have 10 segments totaling 3.16 miles. Twenty-eight of the trails in the R/ECAP scored a higher priority than all the trail needs in the RCAAs.
- **Park Access:** In 2024, there are two regional, three community, and 13 neighborhood parks for a total of 18 City parks in R/ECAPs and one regional, three community, and six neighborhood parks for a total of 10 City parks in RCAAs areas. The RCAAs areas have 15 Clovis or Central Unified School District campuses with open campus policies, which allow residences to use outdoor courts and playfields and structures after school and on weekends. These school campuses have similar amenities to neighborhood and community parks.
- **Park Access:** The parks in the R/ECAPs were built between 1903 and 2014 with the median year being 1968 and the parks in the RCAAs areas were built between 1988 and 2006 with the median year being 1994. In 2016, during the Parks Master Plan process the park consultants evaluated 50 percent of the parks in the R/ECAPs to be in poor condition and 50 percent in fair condition. Whereas, in the RCAAs areas, the parks were considered fair to good condition.
- **Park Access:** The Measure P tax initiative went into effect in 2020 and required at least 50 percent of the funds be allocated to the highest need neighborhoods in Fresno. Through analysis, the Fresno PARCS Department determined the highest need neighborhoods by census tract. There are no highest need neighborhood census tracts in the RCAAs areas while there are 21 in the R/ECAPs.
- **Tree Canopy Coverage:** In 2024, the City completed an Urban Forest Management Plan. The Plan conducted an analysis to determine a planting priority score for all census tracts in the city. Among all census tracts the lowest score was zero, the highest 78, and the median 22. The R/ECAPs had 20 census tracks above the median and the RCAAs areas had two.

- **Housing Conditions**: In 2010, the City did a windshield neighborhood condition survey as part of the General Plan update. The study concluded that the housing was in good condition in the RCAAs areas and in fair to poor condition in the R/ECAPs.
- **Healthy Food:** According to the USDA Economic Research Service, in 2019, there were 12 census tracts with low income and low access to food and most were in Southwest Fresno.
- **Healthcare:** According to FELT there are eight hospitals and clinics within or near the RCAAs areas and eleven in the R/ECAPs. There is a large network of doctor's offices along Herndon Avenue between Highways 99 and 41 near the RCAAs areas and in Downtown Fresno within the R/ECAPs.

To improve the quality of life and access to opportunities in R/ECAPs, the Housing Element includes several key programs and initiatives, summarized below (see Section 1E-1 Action Plan for more details on each of these programs).

- **Program 2 – Variety of Housing Opportunities in High Resource Areas.** Increase the availability of affordable housing units in higher resource areas to alleviate pressure in R/ECAP areas, reduce housing cost burdens, and improve living conditions.
- **Program 11 – Incentives for Housing Development.** Provide incentives to encourage private developers to include affordable housing in their projects.
- **Program 19 – Home Buyer Assistance.** Promote homeownership programs that provide down payment assistance and affordable mortgage options for low-income families.
- **Program 22 – Housing Rehabilitation.** Launch a housing rehabilitation program that offers grants or low-interest loans to homeowners for repairs and maintenance. Provide resources and support for weatherization and energy efficiency upgrades.
- **Program 23 – Comprehensive Code Enforcement.** Implement code enforcement initiatives to ensure landlords maintain rental properties to health and safety standards.
- **Program 27 – Environmental Justice.** Prepare an Environmental Justice Element with actions to improve public health and quality of life in disproportionately impacted neighborhoods focusing on: equitable distribution of parks, recreation facilities, and other beneficial civic and cultural facilities; planting native trees and vegetation in neighborhoods with less tree canopy coverage; access to multi-modal transportation opportunities; and healthy food access.
- **Program 28 – Equitable Community Investments.** Develop publicly accessible tools for the evaluation and tracking of infrastructure projects in areas of greatest need (high segregation & poverty, low resource, and moderate resource).
- **Program 29 – Equitable Engagement.** Expand outreach and public education strategies to increase engagement amongst historically underrepresented populations and residents with the greatest need.

- **Program 30 – Workforce Development.** Provide job training programs to improve economic opportunities, reduce poverty, and increase financial stability.
- **Program 33 – Mobile Home Parks.** Protect mobile home park residents from excessive rent increases and preserve mobile homes as opportunities for homeownership to individuals and households who might not be able to afford other housing purchase options.
- **Program 34 – Eviction Protection Program.** Defend tenants renting an apartment or house in the city of Fresno from unlawful eviction.
- **Program 36 – Homeless Assistance.** Invest in various initiatives to provide housing, emergency shelter, and essential services to people experiencing homelessness.

Description of R/ECAP Areas

The Downtown neighborhoods are some of the oldest in Fresno, as the city began as a railroad town around the Central Pacific Railroad Depot in 1872. Spurred by the railroads and expanding agricultural opportunities, the town grew quickly and in 1885 was incorporated into a city. Many of the immigrants that first arrived were ethnic minorities, who settled in downtown neighborhoods such as Chinatown, Armenian Town, German Town and Italian Town. The town expanded rapidly and between 1913 and 1929, eleven high-rise buildings rose to create a distinct Fresno skyline. However, the Great Depression, redlining practices, and the construction of freeways that cut through these neighborhoods left their mark and contributed to the decline of these neighborhoods over time. However, over the last decade, residents and community leaders have worked together to reinvest in Downtown neighborhoods. A new Development Code was put in place to streamline development, the Southwest Fresno Specific Plan was adopted, and the Transform Fresno Program resulted in over $120M in investment in Southwest Fresno, Downtown and Chinatown, and a new community college opened its doors in the neighborhood in 2024. There are several R/ECAPS in the Downtown Neighborhoods Community Plan area and these are discussed below.

Lowell / Jefferson Neighborhood: This R/ECAP consists of 515 acres just north of Downtown, between Divisadero and State Route 180. The neighborhood began developing in 1884. It has a mix of single family and multifamily housing, and strong historic character. Over time, with construction of the freeways, and migration to the suburbs, it became a mostly rental neighborhood, with many low-quality post WWII apartment buildings constructed as a result of past zoning policies that were not place-based. The neighborhood was also redlined. Current statistics show that over 40% of the population is living below the poverty level and 80% of the households are renters, 20-40% of which are cost-burdened. The neighborhood is also pollution burdened due to proximity to freeways, and has lower access to cars, healthy food, parks, and community facilities. Finally, the low-income population in the area has a high level of displacement risk.

To address concerns related to incompatible development and quality of life, the Fulton-Lowell Specific Plan was adopted in 1996, and a Design Review Committee was created to ensure new development was compatible with the neighborhood. Subsequently, the City adopted the Downtown Neighborhoods Community Plan and Fulton Corridor Specific Plan, with an accompanying new Development Code that incorporated all applicable provisions of the original specific plan and design guidelines. At the same time, this neighborhood was part of a focused effort to revitalize disadvantaged neighborhoods in and around the Downtown called Restore Fresno. This effort focused on developing leadership capacity among the residents and addressing grassroots issues. The Lowell Community Development Corporation (CDC) was part of these efforts and continues work in the neighborhood today, and was consulted during development of the Housing Element. These new planning efforts helped to conserve the historic character of the neighborhood and build capacity among the residents to effectuate positive change.

Housing Element workshops were conducted in or near this neighborhood on November 16, 2022, March 1, 2023 and August 9, 2023. Community feedback from the workshops was carefully considered and incorporated into the housing element Action Plan.

To further support this neighborhood and promote equitable quality of life, the following Housing Element programs would be most applicable:

- **Program 18** – Mixed Income Neighborhood Trust (the first trust of this kind has been established in the neighborhood and is being administered by the Lowell CDC).
- **Program 19** – Home Buyer Assistance
- **Program 22** – Housing Rehabilitation
- **Program 23** – Comprehensive Code Enforcement
- **Program 32** – Opportunity to Purchase Act
- **Program 34** – Eviction Protection Program, and
- **Program 36** – Homeless Assistance.

Downtown: The 1,000-acre Downtown Neighborhood is located south of Divisadero and bounded by State Routes 41 and 99. Downtown is the oldest part of Fresno and was long the retail, entertainment, and cultural center for not only Fresno, but the surrounding region. Redlining relegated Chinese and other ethnicities, and their businesses, to the west side of the railroad tracks. As the City grew and freeway construction enabled new suburbs and suburban malls, commercial activity in Downtown began to decline. State routes 180, 41, and 99 further isolated downtown from the surrounding neighborhoods upon which it depended for its economic well-being. In the 1960s, the best thinking was to replicate suburban conditions in downtowns, resulting in the conversion of Fulton Street to a pedestrian mall. Unfortunately, this and the continuing outward suburbanization continued to negatively impact commerce and quality of life in downtown. Many large department stores relocated to the suburban malls where commercial activity continues to be focused today.

Downtown Fresno is now in transition, with new priorities established in the Downtown Neighborhoods Community Plan and Fulton Corridor Specific Plan adopted in 2016. While it still has challenges around underperforming retail and lack of round the clock activity, it is the city's largest job center, with over 30,000 jobs, and has the highest concentration of historic resources within the City of Fresno. It is slated to be the location of the nation's first High Speed Rail Station at Mariposa and G Streets. In the last decade, several blocks of new multi-unit and mixed-use development have occurred, mostly in the northern subarea, called the Cultural Arts District or the Mural District. Several projects called out in the plans have been or are being implemented, including the removal of the Fulton Mall and reconstruction of Fulton Street, Chinatown Urban Greening, enhancement of Mariposa Plaza, street upgrades, and sewer and water upgrades.

Disparities in access to opportunity that still exist in the Downtown include average median incomes less than city average of $53,368, poor access to neighborhood serving retail and commercial uses, insufficient access to parks and open space, and aging infrastructure. Downtown has a higher pollution burden due to proximity to three freeways: SRs, 99, 180, and 41. In addition the amount of impervious surfaces results in higher levels of extreme heat. There is a high concentration of individuals experiencing homelessness and individuals with disabilities in the Downtown area; however, government services and high-quality transit opportunities are also concentrated Downtown.

Housing Element workshops were conducted in or near this neighborhood on November 16, 2022, March 1, 2023 and August 9, 2023. Community feedback from the workshops was carefully considered and incorporated into the housing element Action Plan.

Opportunities to promote equitable quality of life in Downtown Fresno include the following Housing Element Programs:

- **Program 7** – Adaptive Reuse
- **Program 24** – Special Needs Housing
- **Program 25** – Development Code Amendments for Compliance with State Law and to Reduce Barriers to Housing Development, and
- **Program 28** – Equitable Community Investments.

Edison Neighborhood: This area consists of 1,560 acres located adjacent to and west of Downtown, bounded on the east by State Route (SR) 99, on the west by Thorne and West Avenues, and on the south by Church Avenue. This area is a multi-ethnic community that was the center of Fresno’s Black community. It includes older residential neighborhoods that are aligned on the original street grid, oriented to the UP railroad tracks; a testament to its original connection to Downtown. Key features of the built environment include Chandler Executive Airport (1929), a designated historic resource, Edison High School, and more churches per capita than any other neighborhood in Fresno.

The area was redlined, graded as C and D on the Home Owners' Loan Corporation (HOLC) Residential Security Map. Construction of SR 99 bifurcated vibrant neighborhoods and cut off this area from Downtown and Chinatown, which was its commercial center. The walkable historic pre-WWII neighborhood fabric was also disrupted by Urban Renewal policies and projects of the 1960s and 1970s, resulting in long-standing cleared vacant lots, public housing, and other developments on "superblocks" with buildings not oriented to the street. Subdivision infill occurred in the 1980s, resulting in patchwork development. School desegregation was implemented in the 1970s. In 1977, the Edison Community Plan was adopted, covering this neighborhood as part of a much larger area west of Downtown.

Indicators of disparities include high segregation of people of color; over 40% of households living under the poverty level; 20-30% of households include individuals with disabilities; and high displacement risk. Housing stock is older and in need of repairs and/or weatherization. Additional environmental factors include lack of neighborhood retail access and high pollution burden due to freeway proximity.

The neighborhood is in transition today, with a focus on revitalization as part of the Downtown Neighborhoods Community Plan. In 2018, the City was awarded $65 million in Transformative Climate Community funds, enabling investments of over $100 million to occur in the Edison Neighborhoods, Southwest Fresno, Downtown, and Chinatown. Investments underway include public transit (new routes provided with enhanced 15-minute frequency) and improvements being made to Frank H. Ball, Sunset, Maxie L Parks, and Neilsen Park. Pedestrian improvements are being made on Cesar Chavez (previously California) Blvd and Church Avenue. A new Community College was recently constructed on Church Avenue just south of the Edison neighborhood.

Housing Element workshops were conducted in or near this neighborhood on November 28, 2022, March 14, 2023 and July 20, 2023. On June 18, 2024, a Climate Adaptation-Environmental Justice Workshop was held in the neighborhood that included fair housing concepts. Community feedback from the workshops was carefully considered and incorporated into the housing element Action Plan.

Opportunities to promote equitable quality of life in the Edison neighborhood include the following Housing Element Programs:

- **Program 19** – Homebuyer Assistance
- **Program 22** – Housing Rehabilitation
- **Program 23** – Comprehensive Code Enforcement
- **Program 24** – Special Needs Housing
- **Program 27** – Environmental Justice; Program, and
- **Program 28** – Equitable Community Investments.

Southeast Neighborhood: This primarily residential neighborhood consists of a 2,400-acre area to the east of Downtown, bounded by SR 41 on the west, SR 180 on the north, Chestnut on the east, and the railroad tracks, Butler, and Cesar Chavez on the south. The western portion of this neighborhood is the oldest, developed in the early 1900s. The area east of Orange and Cedar Avenues developed from the 1930s through the 1950s. Huntington Boulevard was the first subdivision on the eastern edge of Fresno's parent grid (and western edge of this neighborhood) and was platted in 1911 as a streetcar suburb as part of the Alta Vista Tract. Huntington Boulevard is an eclectic mix of architectural styles that were popular from 1911 through the 1960s, including Craftsman bungalows and period revival buildings. Of interest is the economic mix of buildings from upscale mansions to more modest residences for the middle class and working class. This early neighborhood influenced the surrounding neighborhoods, which were mostly working-class bungalow-style homes. Roosevelt High School was constructed in 1928 and there are six more elementary schools in the neighborhood.

Like other neighborhoods within the Downtown Neighborhoods Community Plan area, this neighborhood was redlined. Abandonment of the streetcar in 1929 and the typical early zoning codes were factors that lead to the strip commercial development along the corridors seen today. This neighborhood was also influenced by freeways on its western and northern boundaries, and SR 41 facilitated the City's expansion to the north. When the Roosevelt Community Plan, which covered this area, was initially adopted in 1978, the need for updated infrastructure to facilitate orderly development did not happen in this neighborhood, leaving this area vulnerable to piecemeal rezoning of strip commercial and high-density residential uses. School and park development was unable to keep up with the rapid population growth. Recent investments in building neighborhood capacity (Restore Fresno), rezoning of corridors to mixed use development, designation of the Huntington Blvd neighborhood as a historic district, adoption of the DNCP and investment in high quality transit (BRT "lite) along Cesar Chavez Blvd are leading to neighborhood transformation.

Indicators of disparities in access to opportunities include high segregation of people of color (primarily Hispanic), in southern half of neighborhood; 30-40% of households with incomes below the poverty level in the western portion of the neighborhood; and 40-60% of renter households cost burdened. Over 20% of households are experiencing overcrowding in the southern half of the neighborhood, and the neighborhood is categorized as having moderate displacement risk. The population is this area has lower access to cars, healthy food, and community facilities such as parks and libraries. It also has higher extreme heat risk due to low tree canopy coverage.

Today, the Southeast neighborhood is still predominantly residential. Strip commercial development still lines the major east-west corridors of Butler, Cesar Chavez (previously Kings Canyon), and Tulare Avenues. However, due to its inclusion in the DNCP, and also due to earlier planning efforts related to the Roosevelt Community Plan, the area is in transition, with a major investment in BRT made along the Cesar Chavez corridor in 2018 (the city's highest ridership corridor) connecting residents in this area to Downtown to the west and shopping and schools to the east. Holmes and Romain parks serve the west side of the project area, and these have both had recent investments in amenities, play equipment, and restrooms. Street improvement projects are underway on First Street and Chestnut Avenue that include new bicycle facilities. Investments in leadership capacity have been made through Restore Fresno and the Hidalgo Community Development Corporation now operates in the neighborhood, helping to connect residents to resources.

Housing Element workshops were conducted in or near this neighborhood on October 27, 2022, July 28, 2023, and March 11, 2023. On June 29, 2024, a Climate Adaptation-Environmental Justice Workshop was held in the neighborhood that included fair housing concepts. Community feedback from the workshops was carefully considered and incorporated into the housing element Action Plan.

Opportunities to promote equitable quality of life in the Southeast neighborhood include the following Housing Element Programs:

- **Program 3** – Encourage and Facilitate Accessory Dwelling Units and Small Homes
- **Program 22** – Housing Rehabilitation
- **Program 23** – Comprehensive Code Enforcement
- **Program 24** – Special Needs Housing
- **Program 26** – Fair Housing Services
- **Program 27** – Environmental Justice
- **Program 28** – Equitable Community Investments
- **Program 29** – Equitable Engagement
- **Program 30** – Workforce Housing, and
- **Program 34** – Eviction Protection.

Jane Addams Neighborhood: This neighborhood consists of 1,155 acres located between the Golden State/Union Pacific Railroad alignment on the east and Marks, Hughes and West Avenues on the west. The area is physically isolated from its surroundings by the railroad and has poor internal connectivity as it is bifurcated by SR 99. Key features of the built environment include Roeding Park and Fresno Chaffee Zoo in the southern half and several mobile home parks.

The Jane Addams community was originally rural in nature and consists of small homes on large lots. Tielman Elementary school was constructed in 1911. The Golden State Highway was expanded and redesignated as State Route 99 in 1964, which exacerbated the north/south barrier through the neighborhood. Hotels and motels were constructed along the freeway in the 1950s and 60s, which became blighted and magnets for criminal activity. Because the area was mostly developed while in the County, the roads did not meet City standards, lacking curb, gutter, sidewalks, and street trees. Past policies (or lack thereof) related to freeway construction and City-County coordination of growth and development resulted in negative impacts to this neighborhood.

Today the Jane Addams neighborhood is still largely rural in nature. It is home to several mobile home parks and Jane Addams Elementary School, as well as a patchwork of heavy commercial uses. The area lacks neighborhood-scale open space and commercial amenities. An estimated 30-40% of the residents have incomes below the poverty level. Renter households comprise 40-60% of the neighborhood and 15-30% of the residents are recipients of Housing Choice Vouchers.

Disparities that exist in the neighborhood include poor connectivity within and with surrounding areas, lacking pedestrian and bicycle infrastructure, poor open space access (although Roeding Park is part of this neighborhood, it is difficult to access), and high pollution burden due to freeway proximity.

The neighborhood is in transition today, as public investments are being made in housing, transportation, sewer and water infrastructure, and parks. Among these are conversion of the hotels and motels on Parkway Drive in the project area to Project Homekey transitional housing, and a Parkway Drive Plan to improve the environment and provide freeway buffering and beautification along that corridor. In addition, McKinley Blvd is being widened and enhanced with pedestrian improvements; a pedestrian overcrossing connecting Parkway Drive and Roeding Park is in the early planning stages. The Jane Addams Community Development Corporation has been operating in this area since the Restore Fresno initiative in 2015, helping to build resident leadership capacity.

Opportunities to promote equitable quality of life in the Jane Addams neighborhood include the following Housing Element Programs:

- **Program 3** – Encourage and Facilitate Accessory Dwelling Units and Small Homes
- **Program 27** – Environmental Justice
- **Program 28** – Equitable Investments, and
- **Program 33** – Mobile Home Parks.

The R/ECAPS that are southwest, southeast, and north of Downtown, in Central Fresno, including the outer portions of Southwest Fresno, and portions of the Roosevelt ,McLane and Fresno High-Roeding Communities were affected by these same factors. While redlining did not occur south of Church Avenue, State Routes 41, 99, and 168 traverse those neighborhoods. In addition, poor coordination between City and County planning resulted in the County allowing residential development to occur in these areas in spite of the fact that the City had planned industrial development in the areas south of Downtown from as early as 1918 due to the abundance of transportation options available, including freeways and rail. The City is investing in these neighborhoods as well, with several specific planning efforts complete or underway, including the Southwest Specific Plan and the Central Southeast Specific Plan. These areas are further described below.

Southwest Neighborhood: This 3,255-acre area is the southwestern continuation of the Edison Neighborhood, bounded by SR 180 to the north, North Avenue on the south, Valentine, Marks, Hughes and Walnut on the West, and West and Thorne on the east. Even as an area that developed post WWII, it has experienced many of the same influences as the Edison neighborhood. Initially agricultural land, the area developed as a patchwork of agricultural, residential, and industrial uses, with some commercial sprinkled throughout, resulting in land use incompatibilities. Urban Renewal policies resulted in clearing land for redevelopment that sometimes was left vacant for long periods of time. In addition, much of the transportation network developed in the County, lacking bicycle and pedestrian facilities. The construction of SR 99 cut this area off from its commercial center in Chinatown/Downtown and very little neighborhood serving commercial uses were developed to serve the neighborhoods, leaving residents to travel to other neighborhoods for daily shopping needs, banking, and other services.

The following indicators point to disparities in access to opportunity: 30-40% of the population lives below the poverty line; individuals with disabilities comprise 20-30% of neighborhood residents; and data shows high segregation of people of color. About half of the households are renter households, and rental housing along the Church, Jensen, and North corridors has the highest cost burden. Overcrowding is occurring in over 20% of households between Cesar Chavez Blvd and Church Avenue and in the area between Elm Avenue and SR 41. The area has moderate displacement risk and high pollution burden due to freeway proximity and legacy land uses. It also is at risk for extreme heat due to low tree canopy of 8%, compared to the citywide average of 15%. Other environmental justice concerns include access to public facilities, safe and sanitary housing, and healthy food.

Today, the Southwest Neighborhood is in transition pursuant to the adoption of the Southwest Fresno Specific Plan in 2017, which sought to enhance the plan area by incentivizing housing and commercial development, prioritizing parks and public facilities, and rezoning industrial land to other uses. A brownfields program was started in 2018 and an areawide plan to remediate and catalyze brownfields development was adopted for Elm Avenue in 2019.

Implementation of the Southwest Specific Plan began in 2018 through the Transform Fresno program, which resulted in over $100 million in investment in the plan area, financing a portion of a new community college and the surrounding complete streets, a new park, a shared mobility program, planting of street trees, and more. At least 600 dwelling units of various types, including market-rate single family, are currently in the entitlement process and expected to begin construction in 2025. Southwest Fresno Development Corporation initiated a Homebuyer Education Program to prepare Southwest Fresno residents to purchase the new homes.

Housing Element workshops were conducted in or near this neighborhood on November 28, 2022, March 14, 2023 and July 20, 2023. On June 18, 2024, a Climate Adaptation-Environmental Justice Workshop was held in the neighborhood that included fair housing concepts. Community feedback from the workshops was carefully considered and incorporated into the housing element Action Plan.

Opportunities to promote equitable quality of life in Southwest Fresno include targeting the following Housing Element Programs:

- **Program 3** – Encourage and Facilitate Accessory Dwelling Units and Small Homes
- **Program 19** – Homebuyer Assistance
- **Program 22** – Housing Rehabilitation
- **Program 23** – Comprehensive Code Enforcement
- **Program 24** – Special Needs Housing
- **Program 27** – Environmental Justice
- **Program 28** – Equitable Community Investments, and
- **Program 30** – Workforce Development.

Central Southeast Neighborhoods: This area consists of 2,200 acres adjacent to the eastern boundary of the DNCP, bounded by Belmont Avenue to the north, East Avenue to the west, Church Avenue to the south, and Peach Avenue to the east. Today the plan area includes approximately 30,624 people and 9,150 homes, and is characterized by a blend of older single-family and multi-family housing developments, industrial facilities, public facilities, vacant land, and commercial areas. This area developed post WWII, from the 1950s to the 1980s and includes both higher density single family neighborhoods laid out on small blocks within a gridded street system and later subdivisions with curved streets and cul-de-sacs. Early development in the area consisted of the Fresno County Fairgrounds, established in 1884. Other key elements of the neighborhood include Fresno Pacific University (1964), and the Fresno IRS processing center (now vacant) which was approved in the early 1970s to provide jobs for 4,000 employees. As noted in the Roosevelt Community Plan, the area was often passed over for new investment due to lack of adequate infrastructure and the predominant direction of growth to the north of the city.

The City's facilitation of growth to the north had a negative impact on this area. When the Roosevelt Community Plan, which covered this area, was initially adopted in 1978, the need for updated infrastructure to facilitate orderly development was not prioritized in this neighborhood, leaving this area vulnerable to piecemeal rezoning of strip commercial and high-density residential uses. School and park development was unable to keep up with the rapid population growth.

As of 2018, this neighborhood was more ethnically diverse and with a higher percentage of children than the City as a whole, and consisted of 71% renter households. An estimated 47% of the adult population has not graduated high school and 53% of the neighborhood's households had incomes below the poverty level. The neighborhood includes a high percentage of population that does not own a car, low healthy food access, higher risk of extreme heat, high levels of cost burdened renters, and overcrowding, as well as low access to community facilities such as parks and libraries.

Today the area is in transition, with investments in neighborhood capacity (Restore Fresno), rezoning of corridors to mixed use development, and investment in high quality transit (BRT) along Cesar Chavez Blvd. The IRS site is now vacant and could be available for housing. Sidewalks are being constructed in the neighborhood on the southeast corner of Tulare and Chestnut, near Burroughs Elementary School, and ITS technology is being installed along the Cesar Chavez corridor, all of which are contributing to neighborhood transformation.

A Housing Element workshop was conducted in this neighborhood on November 1, 2022. On June 29, 2024, a Climate Adaptation-Environmental Justice Workshop was held in the neighborhood that included fair housing concepts. Community feedback from the workshops was carefully considered and incorporated into the housing element Action Plan.

Opportunities to promote equitable quality of life in Southeast Fresno include targeting the following Housing Element Programs:

- **Program 3** – Encourage and Facilitate Accessory Dwelling Units and Small Homes
- **Program 22** – Housing Rehabilitation
- **Program 23** – Comprehensive Code Enforcement
- **Program 24** – Special Needs Housing
- **Program 26** – Fair Housing Services
- **Program 27** – Environmental Justice
- **Program 28** – Equitable Community Investments
- **Program 29** – Equitable Engagement
- **Program 30** – Workforce Development, and
- **Program 34** – Eviction Protection.

McLane Neighborhood: This large area, the subject of a Community Plan, consists of 16 square miles, bounded on the north by Ashlan Avenue, the south by McKinley and Belmont Avenues, the east by Locan Avenue, and the west by Blackstone. Key features include the Fresno Yosemite Airport and Manchester Mall. According to the McLane Community Plan, adopted in 1976, the Plan area was fairly orderly and balanced. The area began to develop in the 1940s with the anticipation of Fresno State College locating at Blackstone and Shields, the current location of Manchester Mall. The area primarily developed during post WWII, between the 1950s and the 1980s. The plan notes that multi-unit development had increased from 11% of the housing stock in 1960 to 37% in 1978. Heavy commercial uses and the then new Manchester Mall were located on Blackstone Avenue, while office uses were primarily located on Fresno, First, and Shields Avenues. The area was affected by freeways, as during the period when the community plan was written, rights of ways for SRs 41 and 168 had been cleared, but no construction had taken place for several years, causing uncertainty. Growth to the northeast caused bypassed parcels and sporadic rural residential development east of Clovis Avenue. In general, during the 1970s, the housing conditions were above average, the median income was higher than the Fresno average, and the community had above-average indicators of health.

Today, the McLane area is categorized as 40-60% renter households and the area between Ashlan, McKinley and SRs 41 and 168 is the most cost burdened. Higher poverty areas are on both sides of the three freeways that bound or traverse the area: SRs 41, 180, and 168, while incomes increase east of Willow Avenue. An estimated 30-60% of households in the area between SR 41 and First Street depend on Housing Choice Vouchers, one of the highest rates in the city. The northern portion of the McLane area is racially integrated, while the southern portion is less so. The McLane community has a high pollution burden from airport emissions and well as two freeways, as well as low tree canopy and high urban heat.

The McLane area has developed according to the community plan. The airport expanded and an airport environs plan was adopted to protect the surrounding area from airport noise. Land use and street circulation was adjusted around the airport to include compatible uses such as industrial. The freeways were constructed. Manchester Mall developed, peaked, and is now being repurposed into educational, office, and residential uses. Blackstone has become the city's first BRT corridor. Current investments include construction of the Midtown Trail which traverses the area, a terminal expansion at the airport, numerous traffic improvements including pedestrian amenities, and a new park is being designed at Dakota and Barton. Fresno Interdenominational Refugee Ministries is located in this neighborhood and serves the needs of over 10,000 refugees in the Fresno area, primarily refugees of Southeast Asian, Slavic and African origin.

Housing Element workshops were conducted in or near this neighborhood on August 31, 2022, November 16, 2022, and August 9, 2023. On April 23, 2024, a Climate Adaptation-Environmental Justice Workshop was held in the neighborhood that included fair housing concepts. Community feedback from the workshops was carefully considered and incorporated into the housing element Action Plan.

Opportunities to promote equitable quality of life include targeting the following Housing Element Programs to the McLane neighborhood:

- **Program 3** – Encourage and Facilitate Accessory Dwelling Units and Small Homes
- **Program 19** – Homebuyer Assistance
- **Program 22** – Housing Rehabilitation
- **Program 23** – Comprehensive Code Enforcement
- **Program 27** – Environmental Justice
- **Program 28** – Equitable Community Investments
- **Program 30** – Workforce Development, and
- **Program 34** – Eviction Protection Program.

Fresno High-Roeding Neighborhood. This neighborhood is located in the northern portion of the Fresno High/Roeding Community Plan area and consists of approximately 950 acres bounded by Dakota on the north, Palm on the east, Clinton on the south, and SR 99 on the west. This area developed between the 1950s and 1980s and is within the environs of SR 99. This neighborhood has low food access and very low parks access. Over 40% of all households in this neighborhood live below the poverty level, are renter households, and 60-80% of the households are cost-burdened. Overcrowding is high, with over 20% of households overcrowded. Displacement risk is moderate.

Current investments in this area include a road and sidewalk improvement project in the area bounded by Clinton/Hughes/Shields/West.

Housing Element workshops were conducted near this neighborhood on November 16, 2022, and August 9, 2023. On June 1, 2024, a Climate Adaptation-Environmental Justice Workshop that included fair housing concepts was attended by residents from this neighborhood. Community feedback from the workshops was carefully considered and incorporated into the housing element Action Plan.

Opportunities to promote equitable quality of life in the Fresno High-Roeding Park Neighborhood include targeting the following Housing Element Programs:

- **Program 3** – Encourage and Facilitate Accessory Dwelling Units and Small Homes
- **Program 19** – Homebuyer Assistance
- **Program 22** – Housing Rehabilitation
- **Program 23** – Comprehensive Code Enforcement
- **Program 27** – Environmental Justice
- **Program 28** – Equitable Community Investments, and
- **Program 30** – Workforce Development.

The R/ECAPS in north Fresno developed in the 1950s and the 1980s and have unique factors contributing to their current condition.

El Dorado Park Neighborhood. Located in the Hoover Community west of Fresno State, this neighborhood is occupied by a mix of low income residents and families. Much of the housing stock was cheaply built in the 1960s for students by absentee landlords and has not been well maintained. In recent years, newer student housing has been constructed, accommodating students, while some of the older off-campus student housing has turned over and is being rented to low-income non-student residents. The El Dorado Park Neighborhood Plan, incorporated into the Hoover Community Plan in 2009, was an effort to revitalize this near-campus neighborhood. After the plan was adopted, Fresno Housing revitalized two aging apartment buildings and provided upgraded deed restricted housing for this neighborhood. This inspired neighboring property owners to make improvements to their properties as well, and the PARCs Department now runs programs from a church property in the neighborhood. The momentum generated by the planning and revitalization efforts resulted in the construction of a new community center, which opened after the pandemic. The center has a gym, educational programs, after-school programs, and activities for seniors.

Even after adoption of the El Dorado Park Neighborhood Plan, the neighborhood is still in transition, with high levels of poverty, renter households, and cost burden. A 15-30% utilization of Housing Choice Vouchers exists in this neighborhood. Significant social disparities exist in the community and are most prevalent between the Fresno State area and El Dorado Park. Fresno State owns many of the adjacent parcels surrounding the campus and provides amenities such as libraries, athletic and recreational facilities, and dining facilities that are intended to serve its student population. By contrast, El Dorado Park has aging infrastructure and experiences higher levels of crime. Both Fresno State and El Dorado Park have high pollution exposure due to proximity to freeways and the Fresno Yosemite Airport.

Recent investments include a new Class IV bike path along Barstow Avenue, the northern boundary of the neighborhood.

Housing Element workshops were conducted in or near this neighborhood on February 25, 2023 and July 22, 2023. On June 1, 2024, a Climate Adaptation-Environmental Justice Workshop was held in the neighborhood that included fair housing concepts. Community feedback from the workshops was carefully considered and incorporated into the housing element Action Plan.

Opportunities to promote equitable quality of life in the El Dorado Park neighborhood include targeting the following Housing Element Programs:

- **Program 19** – Homebuyer Assistance
- **Program 22** – Housing Rehabilitation
- **Program 23** – Comprehensive Code Enforcement
- **Program 27** – Environmental Justice, and
- **Program 28** – Equitable Community Investments.

Shaw/Marks Neighborhood. Located in the southwest corner of the Bullard Community Plan, this 785-acre R/ECAP is located in the southwest quadrant of the intersection of Shaw and Marks Avenues, bounded by Shaw Ave on the north, Marks Avenue on the east, and bounded by the SR 99 corridor and the UP railroad tracks on the west. While the Bullard Community Plan area generally scores high on measures related to income, socio-economic conditions, and environmental conditions, this particular area is subject to pollution burden. Compared to the rest of the Bullard Community Plan area, this neighborhood has lower incomes, a higher proportion of renter households (40-60% compared to under 20% for much of the plan area), and higher utilization of Housing Choice Vouchers (5-15% compared to less than 5% for most of the plan area).

Housing Element workshops were conducted near this neighborhood on November 9, 2022 and March 1, 2023. Community feedback from the workshops was carefully considered and incorporated into the housing element Action Plan.

Opportunities to promote equitable quality of life in the Shaw/Marks Neighborhood include targeting the following Housing Element Programs:

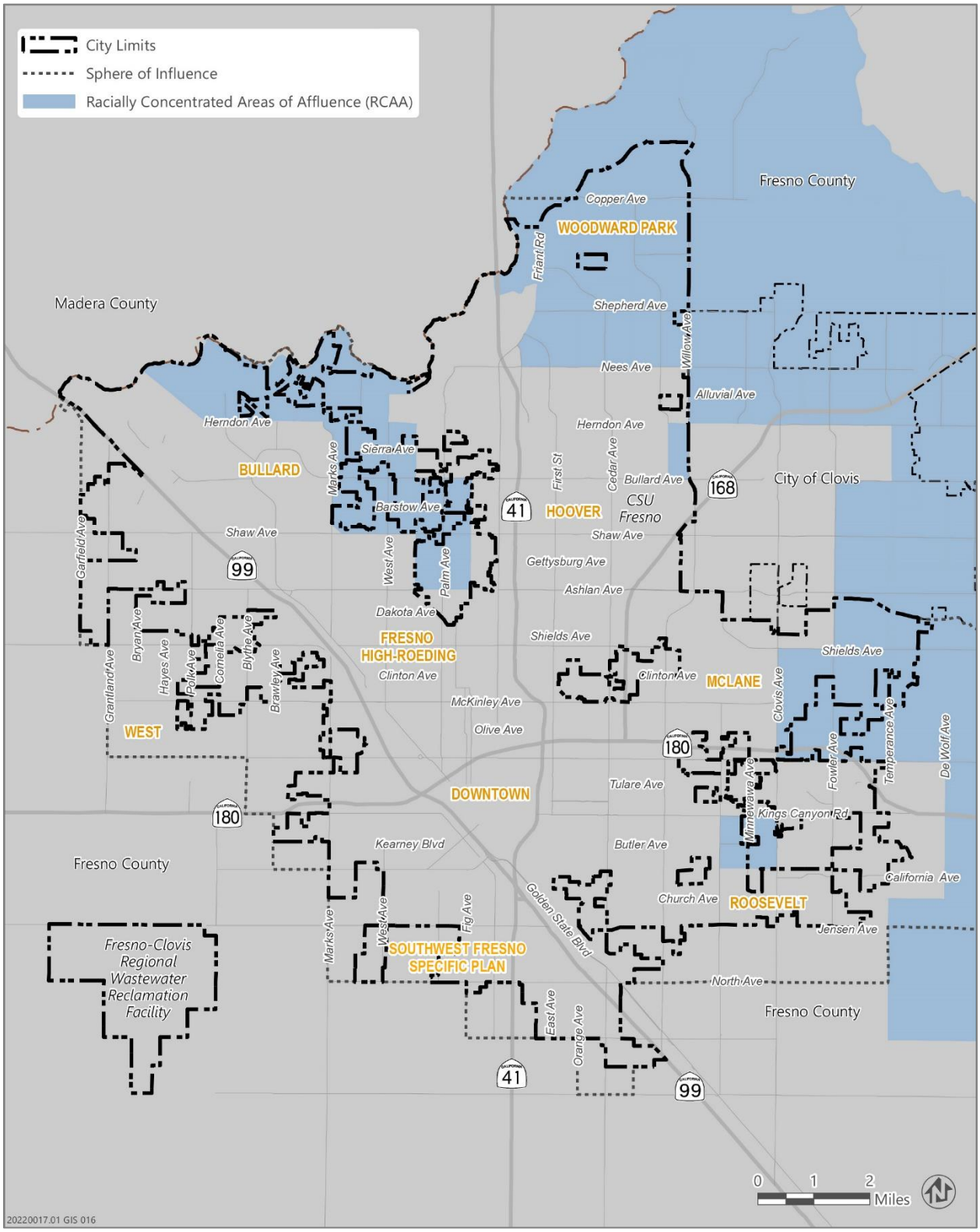
- **Program 19** – Homebuyer Assistance
- **Program 22** – Housing Rehabilitation
- **Program 23** – Comprehensive Code Enforcement
- **Program 27** – Environmental Justice
- **Program 28** – Equitable Community Investments, and
- **Program 30** – Workforce Development.

Areas of Affluence

Racially or Ethnically Concentrated Areas of Affluence (RCAAs) are neighborhoods in which there are both high concentrations of White households and high household income rates. Using HCD's methodology for identifying RCAAs in California, RCAAs in Fresno County are census tracts with: 1) an average total White population that is 1.25 times higher than the average total White population in the Fresno County region and 2) a median household income that is 1.5 times higher than the Fresno County AMI in 2019. Based on this methodology, there are several RCAAs in Fresno County (see Figure 3-16, Regional RCAAs) including in the cities of Fresno and Clovis. As shown in the figure, RCAAs are present in unincorporated islands including additional unincorporated areas east of Clovis and Fresno.

Figure 1E-3.12 displays a closer look at RCAAs in the city of Fresno. There are 18 RCAA tracts within the city limits. Several of the RCAA tracts overlap with areas that are not incorporated into Fresno city limits as of 2022. Within Fresno City, RCAAs are generally found in the North and Northeast Fresno neighborhoods, often characterized by high property values, excellent schools, and well-maintained infrastructure. Neighborhoods deemed as RCAAs include portions of the Woodward Park, Bullard, McLane, and Roosevelt community areas.

Figure 1E-3.12: Racially/Ethnically Concentrated Areas of Affluence, Fresno, 2019



Source: Data download from the HCD AFFH Mapping tool in 2021.

Several policies and historical forces have contributed to the formation of RCAAs. Areas of affluence in Fresno largely developed as a result of newly constructed freeways and new subdivision development at the outer edges of the city where land was less expensive. Historically, lending practices have favored white, affluent borrowers, facilitating easier access to home loans and homeownership in these areas while zoning regulations favored single-family homes and large lot sizes limiting the availability of affordable housing to maintain high property values. Affluent households began to purchase new single family homes on inexpensive land in north and northeast Fresno. These northern suburbs have the advantage of Clovis Unified School District's high performing schools and a healthcare sector along Herndon Avenue . Affluent northern neighborhoods are also well served by large amounts of park land since they were developed more recently when the City established a mechanism to require land dedication and fees for park development, while many of the central neighborhoods in Fresno lack convenient access to parks and fall well below the City standard of 3.0 acres per 1,000 residents, since these neighborhoods were developed prior to having park dedication and development requirements.

As will be discussed, these neighborhoods have the greatest access to resources including positive educational outcomes, high labor market engagement (despite having further proximity from major employment centers), and healthier environmental conditions relative to the region. Compared to other areas in the city, RCAAs have distinct characteristics:

- Predominantly white population (**Figure 1E-3.2**)
- Median household incomes greater than $100,000 per year (**Figure 1E-3.5**)
- Significantly lower poverty rates (**Figure 1E-3.7**)
- Higher percentages of children in married-couple households (**Figure 1E-3.8**) than single-parent households (**Figure 1E-3.9**)
- Lower rates of people living with disabilities (**Figure 1E-3.10**)
- Positive educational outcomes based on the 2021 TCAC Opportunity Index (**Figure 1E-3.15**)
- Greater labor market engagement (**Figure 1E-3.17**)
- More positive environmental conditions Index (**Figure 1E-3.23** through **Figure 1E-3.25**)
- Higher percentage of owner-occupied units (**Figure 1E-3.28**)
- Lower rates of housing cost burden (**Figure 1E-3.31** and **Figure 1E-3.32**)

The Housing Element includes the following programs, many of which are already established and ongoing, which will help to promote inclusivity, affordability, and diversity in RCAAs (see Section 1E-1 Action Plan for more details on each of these programs):

- **Program 2 – Variety of Housing Opportunities in High Resource Areas.** Create additional capacity for multi-unit lower-income housing units in high and highest resource areas.
- **Program 3 – Encourage and Facilitate Accessory Dwelling Units and Small Homes.** Promote the construction of ADUs to increase affordable housing options and diversify housing types in RCAAs.
- **Program 11 – Incentives for Housing Development.** Encourage the development of affordable housing in RCAAs by providing financial and regulatory incentives.

- **Program 14 – Partnerships with Affordable Housing Developers.** Partner with affordable housing developers and stakeholders to facilitate the development of housing that is affordable to low- very low- and extremely low- income households, with at least 40 percent developed in high or highest resource areas to facilitate housing mobility for lower-income households and special-needs groups.
- **Program 20 – Housing Choice Voucher Incentive Program.** Provide housing vouchers and subsidies to low-income families, allowing them to move to RCAAs. Partner with landlords and property managers in RCAAs to encourage participation in voucher programs.
- **Program 26 – Fair Housing Services.** Provide training and resources for landlords and property managers on fair housing laws and best practices to prevent bias based on race, ethnicity, income, or family status.

Contributing Factors to Patterns of Segregation

Municipal land use policies (e.g., zoning, code enforcement, and redevelopment) are one of the focal determinants affecting race and class segregation. In most cities throughout the San Joaquin Valley, it is common for higher income areas (e.g., RCAAs) to be zoned single family or low density residential, while lower-income areas (e.g., RECAPs) contain most of the higher density residential zoning. This trend is applicable to development patterns in Fresno particularly in new growth areas, such as Northeast Fresno, which start out with predominantly single family development then fill in with higher density residential later. Regulatory constraints have perpetuated patterns of spatial inequality since middle- and lower-income households have traditionally been excluded from these high opportunity areas.

Access to Opportunity

Since 2017, the Tax Credit Allocation Committee (TCAC) and California Department of Housing and Community Development (HCD) have developed annual maps of access to resources such as high-paying job opportunities; proficient schools; safe and clean neighborhoods; and other healthy economic, social, and environmental indicators to provide evidence-based research for policy recommendations. This effort has been dubbed "opportunity mapping" and is available to all jurisdictions to assess access to opportunities within their community.

HCD defines access to opportunity as a concept to approximate place-based characteristics linked to critical life outcomes.[12] Improving access to opportunity means both improving the quality of life for residents of low-income communities, as well as supporting mobility and access to "high resource" neighborhoods. This encompasses education, employment, economic development, safe and decent housing, low rates of violent crime, transportation, and other opportunities, including recreation, food, and healthy environment (air, water, safe neighborhood, safety from environmental hazards, social services, and cultural institutions).

The opportunity mapping process includes three domains: economic, environmental, and education. Each domain uses a number of indicators to determine its individual score. **Table 1E-3.4** shows the full list of indicators. The indicators are then averaged into a composite index score.

[12] California Department of Housing and Community Development (HCD) AFFH Guidance Memo, April 2021 update, pg. 34.

Table 1E-3.4: Domains and List of Indicators for Opportunity Maps

Domain	Indicators
Environmental	CalEnviroScreen 4.0 pollution indicators and processed values
Economic	Poverty
	Adult education
	Employment
	Job proximity
	Median home value
Education	Math proficiency
	Reading proficiency
	High School graduation rates
	Student poverty rates
Poverty and Racial Segregation	Poverty: tracts with at least 30 percent of population under federal poverty line
	Racial Segregation: Overrepresentation of people of color relative to the county (i.e., Tracts with a racial location quotient higher than 1.25 for Black or African American, Hispanic, Asian, or all people of color in comparison to the county)

Source: CA Fair Housing Task Force, Methodology for TCAC/HCD Opportunity Maps, December 2021.

The opportunity mapping tool maps areas of highest resource, high resource, moderate resource, moderate resource (rapidly changing), low resource, and high segregation and poverty.

- **Highest Resource.** Areas designated as "highest resource" are the top 20 percent highest-scoring census tracts in the region. It is expected that residents in these census tracts have access to the best outcomes in terms of economic opportunities, health, and education attainment.
- **High Resource.** Census tracts designated "high resource" score in the 21st to 40th percentile compared to the region. Residents of these census tracts have access to highly positive outcomes for health, economic, and education attainment.
- **Moderate Resource.** "Moderate resource" areas are in the top 30 percent of the remaining census tracts in the region and those designated as "moderate resource (rapidly changing)" have experienced rapid increases in key indicators of opportunity, such as increasing median income, home values, and an increase in job opportunities. Residents in these census tracts have access to either somewhat positive outcomes in terms of health, economic attainment, and education; or positive outcomes in a certain area (e.g., score high for health, education) but not all areas (e.g., may score poorly for economic attainment).
- **Low Resource.** Low-resource areas are those that score in the bottom 30 percent of census tracts and indicate a lack of access to positive outcomes and poor access to opportunities.
- **High Segregation and Poverty.** The final designation are those areas identified as having "high segregation and poverty;" these are census tracts that have an overrepresentation of people of color compared to the county as a whole, and at least 30 percent of the population in these areas is below the federal poverty line ($27,750 annually for a family of four in 2022).

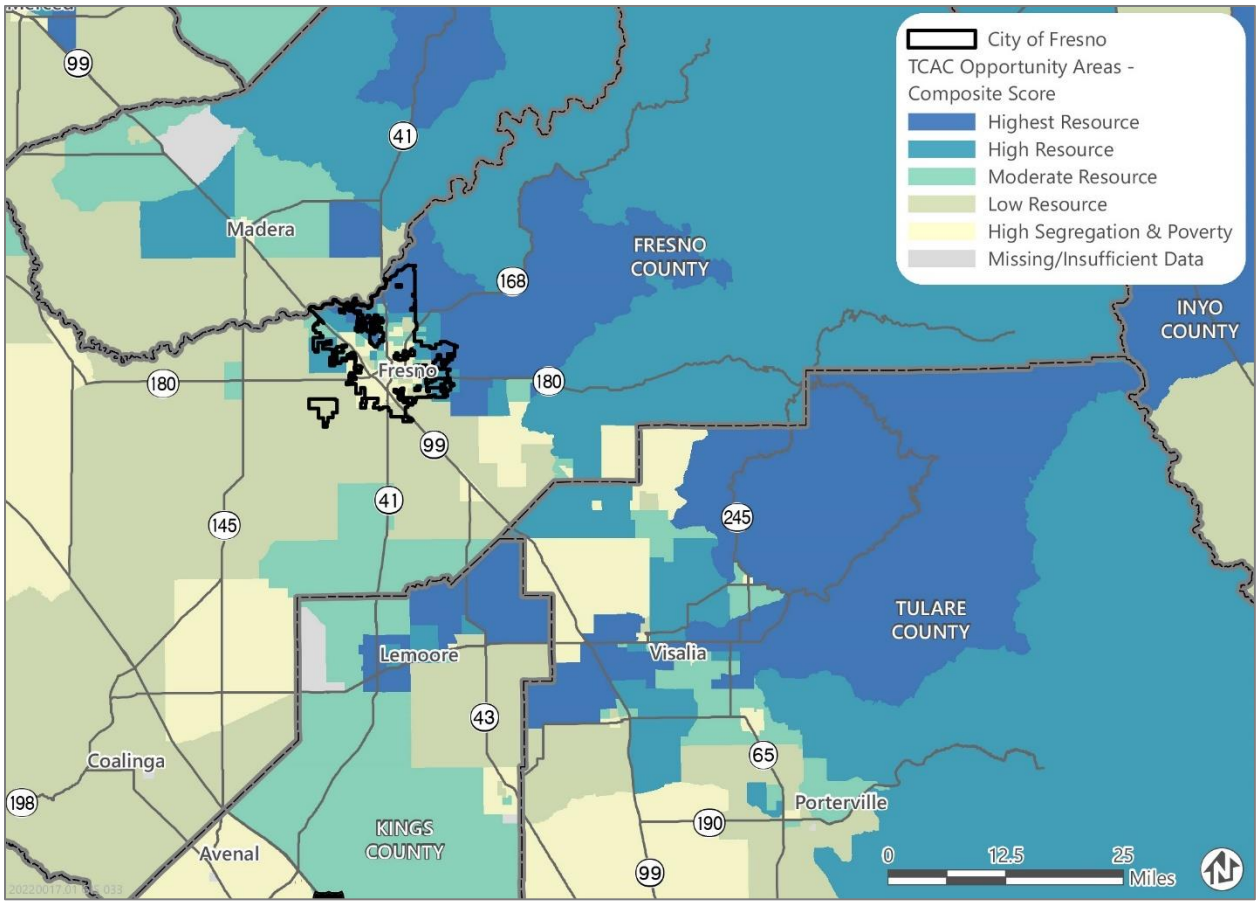
Overall, in comparison to other more affluent areas of California, the San Joaquin Valley has very little access to opportunity.[13] **Figure 1E-3.13** shows the composite score of the 2022 TCAC Opportunity Areas in the Fresno County region. As shown in the figure, most of Fresno County is a mix of low-resource or moderate-resource areas and areas of high segregation and poverty. There are pockets of high-resource designations throughout incorporated areas and in the northeast and eastern portions of the county. Lower resource areas of high segregation and poverty are identified in the western unincorporated areas of the county.

Figure 1E-3.14 shows a closer look at the TCAC Opportunity Areas in the city of Fresno. As the largest city in the county, Fresno has the greatest variation in resource area designations among the incorporated cities of Fresno County. Growth areas on the periphery of established neighborhoods along the northern and eastern edges of the city are designated moderate and high resource designations, including an annexation area, designated as highest. The central portion of the city is designated as low resource and high segregation and poverty.

Across the nation, affordable housing has been disproportionately developed in minority neighborhoods with high poverty rates, thereby reinforcing the concentration of poverty and racial segregation in low opportunity and low resource areas. Fresno is no different. While communities of color account for more than half of the population in the county, the county's racial inequities persist across all indicators of community health and well-being. These inequities threaten future economic prosperity[14].

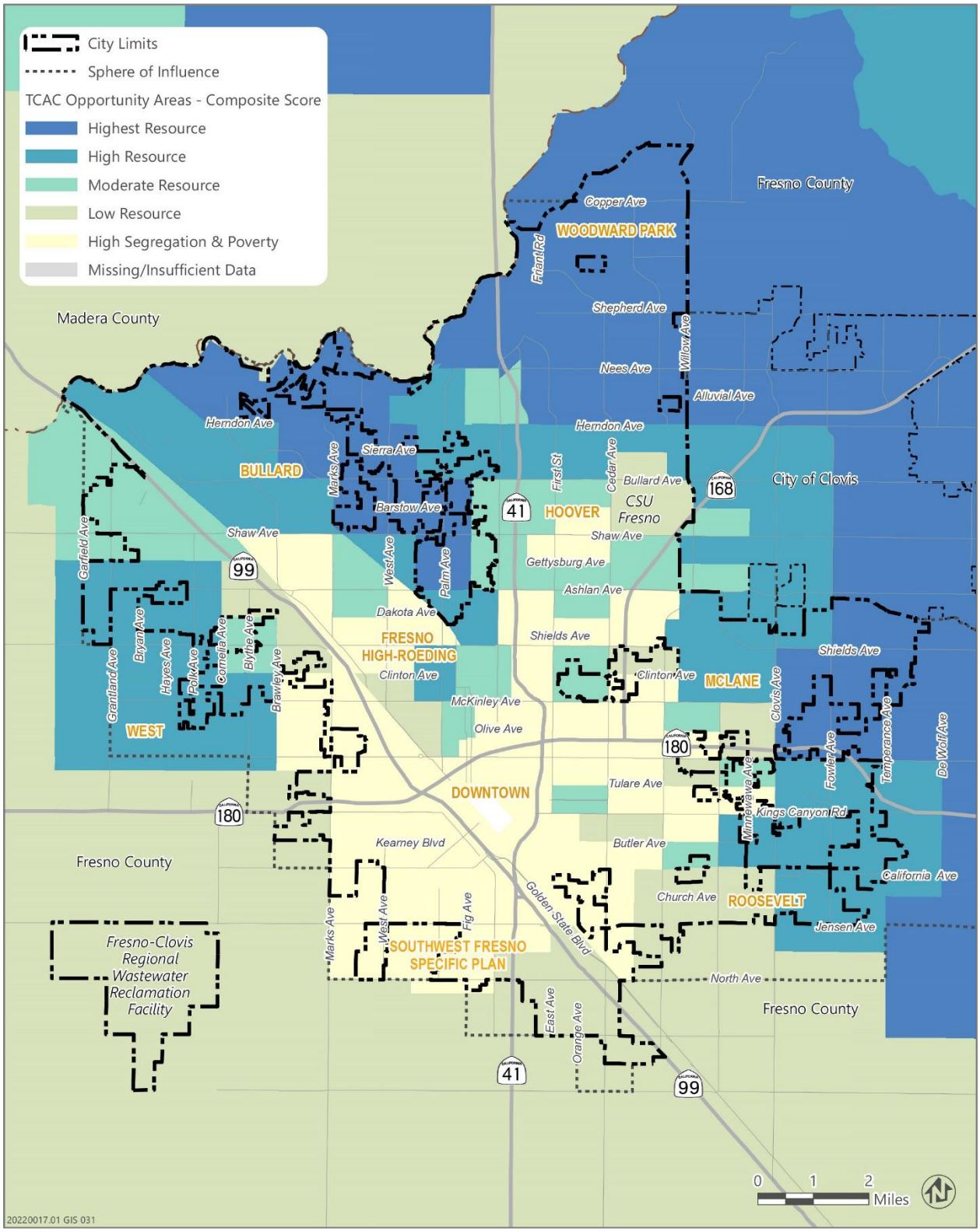
[13] San Joaquin Valley Fair Housing and Equity Assessment, 2014. Available via: https://academics.fresnostate.edu/oced/documents/SJV_Fair-Housing-and-Equity-Assessment_April-2014.pdf.
[14] PolicyLink, 2017. Advancing Health Equity and Inclusive Growth in Fresno County. Accessed via: https://www.policylink.org/sites/default/files/advancing-health-equity-and-inclusive-growth-in-fresno.pdf.

Figure 1E-3.13: TCAC Opportunity Areas - Composite Score, Region, 2022



Source: Data downloaded from the California State Treasurer TCAC/HCD Opportunity Area Maps in 2022.

Figure 1E-3.14: TCAC Opportunity Areas - Composite Score, Fresno, 2022



Source: Data downloaded from the California State Treasurer TCAC/HCD Opportunity Area Maps in 2022.

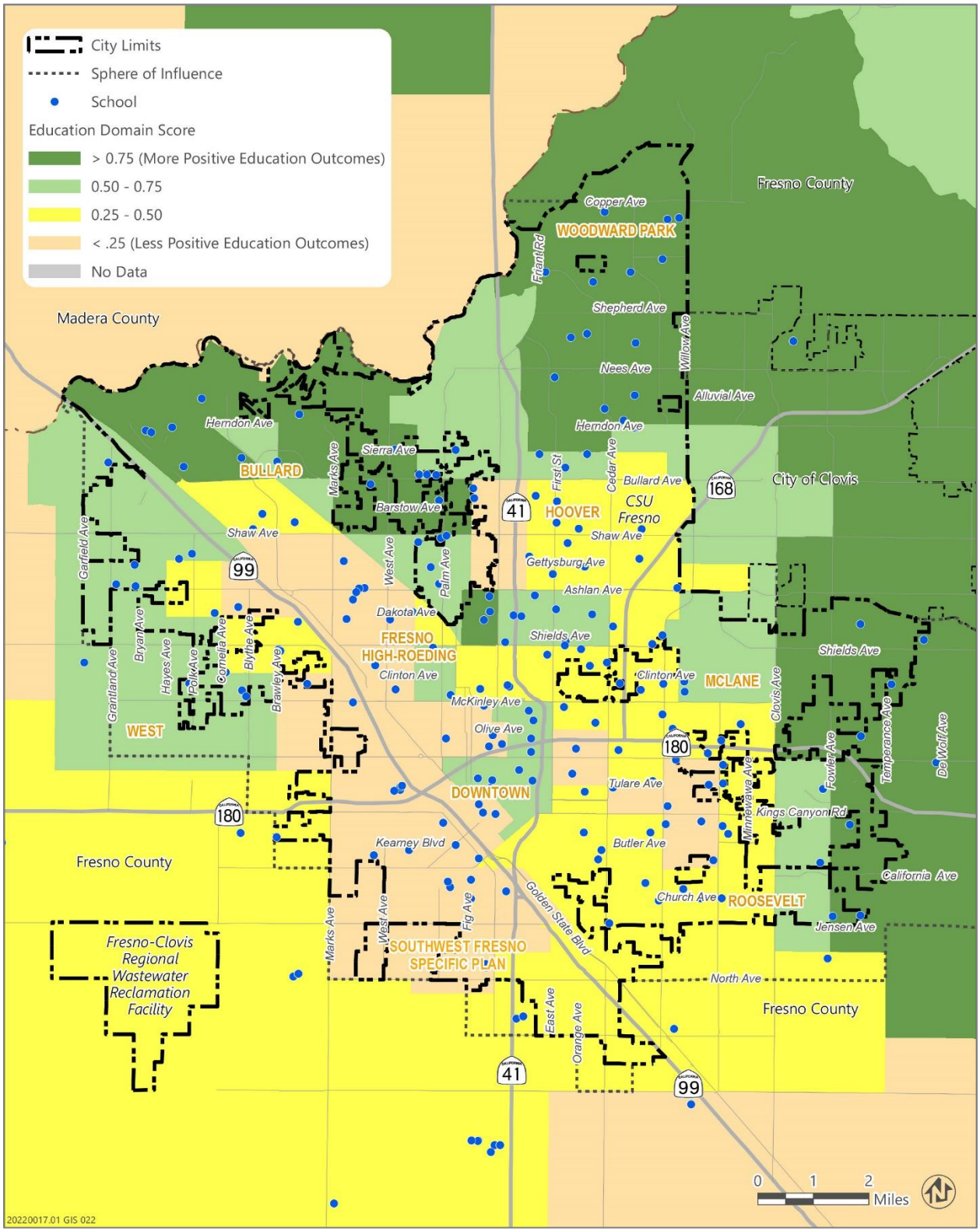
Educational Opportunity

School proficiency is an indication of the quality of education that is available to residents of an area. High quality education is a vital community resource that can lead to more opportunities and improve quality of life. Historically, neighborhoods or communities with higher median incomes and home values have had access to higher-performing schools than residents of lower-income neighborhoods since income distribution influences home values and property taxes, and therefore funding for public schools.

Each year, the California Department of Education (DOE) publishes performance metrics for public schools in the state, including student assessment results for English Language Arts and Mathematics as they compare to the state grade-level standards and demographic characteristics of each school's student population. Historically, school districts with higher concentrations of affordable housing typically have lower test scores in schools. The characteristics reported on include rates of chronic absenteeism and suspension, percentage of students that are socioeconomically disadvantaged, percentage of students that are in foster care, percentage of students learning the English language, and the percentage of high school students that are prepared for college. Students who are eligible for free or reduced-priced meals, or who have parents or guardians who did not receive a diploma are also considered socioeconomically disadvantaged. TCAC and HCD rely on this data from DOE to determine the expected educational outcome in each census tract and block group within the state. TCAC and HCD's educational domain score reflects mathematics proficiency, reading proficiency, high school graduation rates, and student poverty rates of all schools for which this data is available, culminating in a score ranging from 0 to 1, with higher values being the most positive expected educational outcome.

Figure 1E-3.15 shows the 2021 TCAC/HCD education domain score in Fresno. Access to proficient schools among block groups varies significantly throughout the city. Clovis Unified School District and Central Unified School District are performing best as indicated in this map. Block groups in north Fresno, which have higher proportions of white residents, have the highest school proficiency index scores (greater than .75). Despite the presence of CSU Fresno and University High School, a top 100 school by U.S. News and the highest ranked high school in Fresno, census tracts surrounding the CSU Fresno campus scored between 0.25 and 0.5 indicating less positive education outcomes. The area is classified as a racially concentrated area of poverty, and as described above and shown in **Table 1E-3.4**, student poverty rates are a determining variable in measuring educational opportunity and outcomes. School proficiency index scores are lowest in the southern and western portions of the city, areas in which Hispanic and Black or African American residents generally reside, and within Fresno Unified and Washington Union school districts.

Figure 1E-3.15: TCAC Opportunity Areas - Education Score, Fresno, 2021



Source: Data downloaded from the HCD AFFH Data Tool in 2021. Note that this data is based on 2021 TCAC Opportunity Areas as the 2022 data by indicator is not yet available through the HCD AFFH Tool.

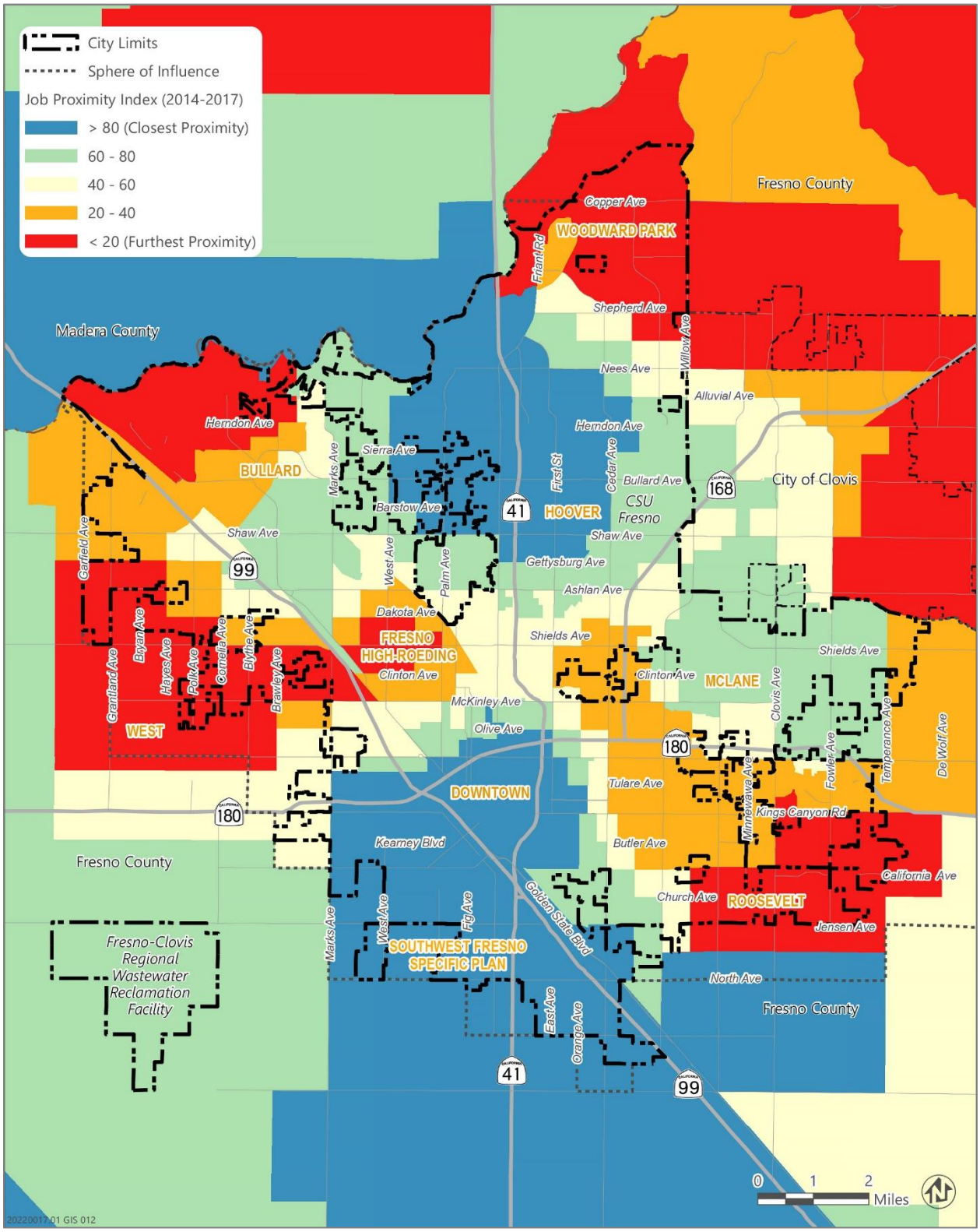
Results from the survey conducted for the 2020 Analysis of Impediments to Fair Housing Choice in Fresno echoed concerns surrounding disparate access to proficient schools, with approximately 40 percent of survey respondents noting that schools in the city are not equally provided for. In addition, public comments received on the Draft Housing Element expressed concerns that students in certain areas of the city, particularly in R/ECAP areas, face unsafe and challenging conditions traveling to and from school. This is due to the lack of or incomplete sidewalks, stormwater drainage, and streetlights in these areas; coupled with inefficient public transportation options in neighborhoods at the fringes of the city; and the use of local roads by heavy-duty truck traffic. These conditions also have a significant impact on the quality of the environment in which learning is taking place. The City intends to prepare an Environmental Justice element that will dive deeper into these issues to develop specific actions related to educational opportunity and equitable access.

Employment Opportunity

Although neighborhoods with jobs in close proximity are often assumed to have good access to jobs, distance alone does not capture any other factor such as transportation options, the type of jobs available in the area, or the education and training necessary to obtain them. There may be concentrations of jobs and low-income neighborhoods in urban centers, but many of the jobs may be unattainable for residents of low-income neighborhoods. This section analyzes both the labor market engagement and jobs proximity indices, developed by HUD, which together offer a better indication of job accessibility for residents of specific areas. The jobs proximity index measures the physical distance between place of residence and job locations, with employment centers weighted more heavily. It also takes into account the local labor supply (i.e., competition for jobs) near such employment centers. The Labor Market Engagement Index is based on unemployment rate, labor force participation rate, and the percentage of the population age 25 and over with a bachelor's degree or higher. For both indices, census block group results are standardized on a scale of 0 to 100 based on relative ranking nationally. A higher score indicates stronger job proximity or labor force participation.

Figure 1E-3.16 shows the Jobs Proximity Index in Fresno. Fresno generally has moderate levels of jobs proximity. Block groups with high proximity to jobs are well-distributed across the city indicating employment centers. Jobs Proximity Index scores are higher for Downtown neighborhoods as well as in north Fresno around the Hoover neighborhood and California State University (CSU) Fresno. Additionally, data shows that the majority of workers employed in the city both live and work in Fresno (56.8 percent) while a lower proportion of residents live in Fresno but commute to employment elsewhere (43.2 percent).

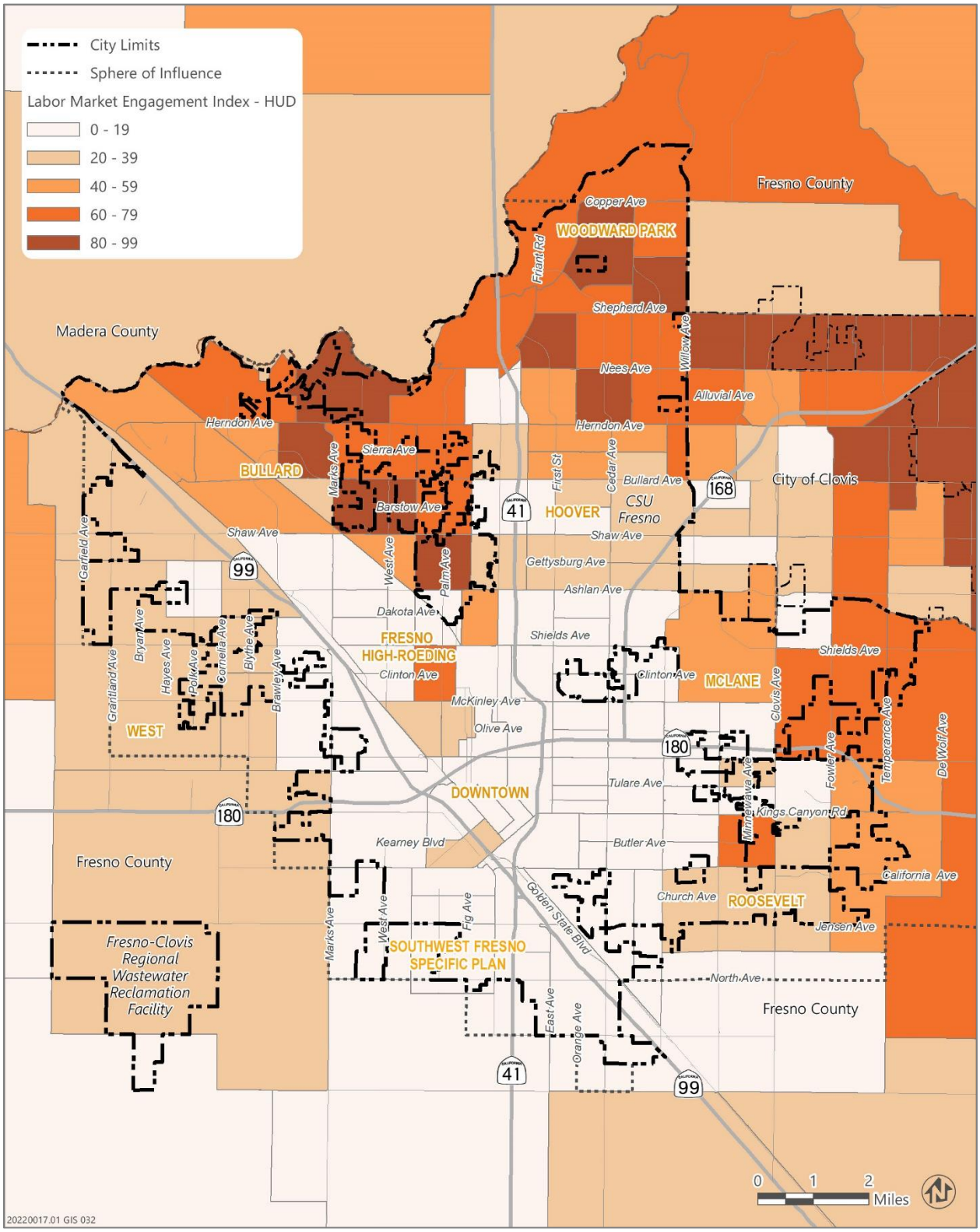
Figure 1E-3.16: Jobs Proximity Index, Fresno, 2017



Source: Data downloaded from the HCD AFFH Data Tool in 2021. Based on 2014-2017 HUD Jobs Proximity Index.

Figure 1E-3.17 maps Labor Market Engagement Index scores for block groups in Fresno. Despite being one the largest cities in the county, there are stark disparities in labor market engagement in that most of Fresno's southern block groups indicate low levels of engagement with the labor market. Regionally, the highest labor force engagement scores are in the unincorporated county islands in northern Fresno and the majority of Clovis and unincorporated area immediately adjacent to Clovis on the east. While block groups in north Fresno display high levels of labor market engagement, the southern areas of the city have low levels of engagement with the labor market, which can indicate high unemployment rates and/or low educational attainment. Compared to **Figure 1E-3.7** above, Distribution of Poverty, the population living below the poverty line generally has higher levels of jobs proximity compared to the population in the city as a whole but lower levels of labor market engagement, indicating an inability to access jobs due to factors other than proximity or a choice to not engage in the labor market. Comparing **Figures 1E-3.5** and **1E-3.7**, not engaging in the labor market can be a contributing factor to lower median incomes and poverty. Interviews with stakeholders in the city conducted for the 2020 Analysis of Impediments to Fair Housing Choice indicated that contributing factors to lower labor market engagement may also be a result of lack of access to transportation and/or mismatches between available jobs and worker education and skillsets.

Figure 1E-3.17: Labor Market Engagement Index, Fresno



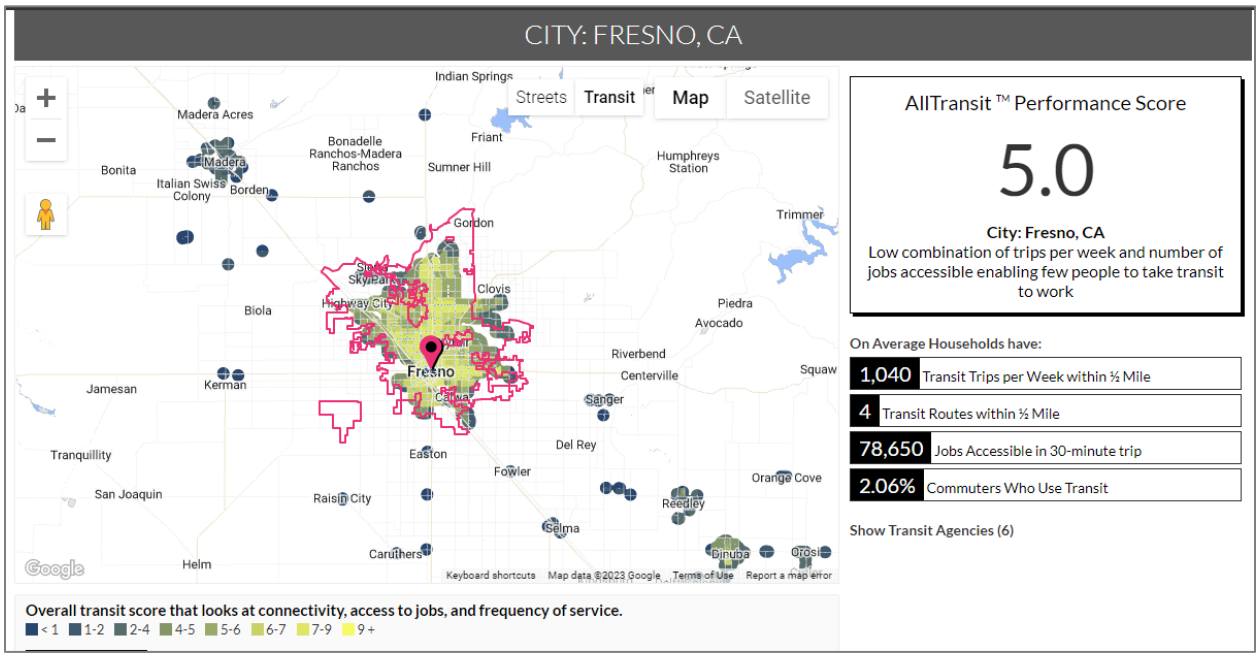
Source: Data downloaded from the HCD AFFH Data Tool in 2021. Based on HUD Labor Market Engagement Index.

Transit Mobility

Transit mobility refers to an individual's ability to navigate the city and region on a daily basis to access services, employment, schools, and other resources. Indicators of transit mobility include the extent of transit routes, proximity of transit stops to affordable housing, and frequency of transit. The city of Fresno is generally car-dependent but there is some variation in level of transit access, walkability, and access to amenities.

AllTransit is one type of transit and connectivity analytic tool developed by the Center for Neighborhood Technology for the advancement of equitable communities and urban sustainability[15]. The tool analyzes the transit frequency, routes, and access to determine an overall transit score at the city, county, and regional levels. Geographic regions (e.g., cities, counties, Metropolitan Statistical Areas (MSAs)) are scored on a scale of 0 to 10, with 10 being complete transit connectivity. The Multi-Jurisdictional Housing Element Chapter 3, Table 3-18 displays AllTransit Performance Scores for all Fresno County jurisdictions based on data from 2019. **Figure 1E-3.18** below shows Fresno's performance score representing average household transit access. Fresno's score is 5.0, indicating a low combination of trips per week and number of jobs accessible, enabling fewer people to take transit to work. Overall, Fresno has a higher performance score than the county (3.2) however the city of Fresno represents an outlier both in terms of population size, degree of urbanization, and transit accessibility amongst jurisdictions in the county. It should be noted that since the last update of AllTransit analytics in 2019, transit routes have been added, frequencies increased, and fares reduced.

Figure 1E-3.18: AllTransit Performance Score, Fresno, 2019



Source: AllTransit.cnt.org, 2019

[15] Center for Neighborhood Technology, 2019, AllTransit™, alltransit.cnt.org

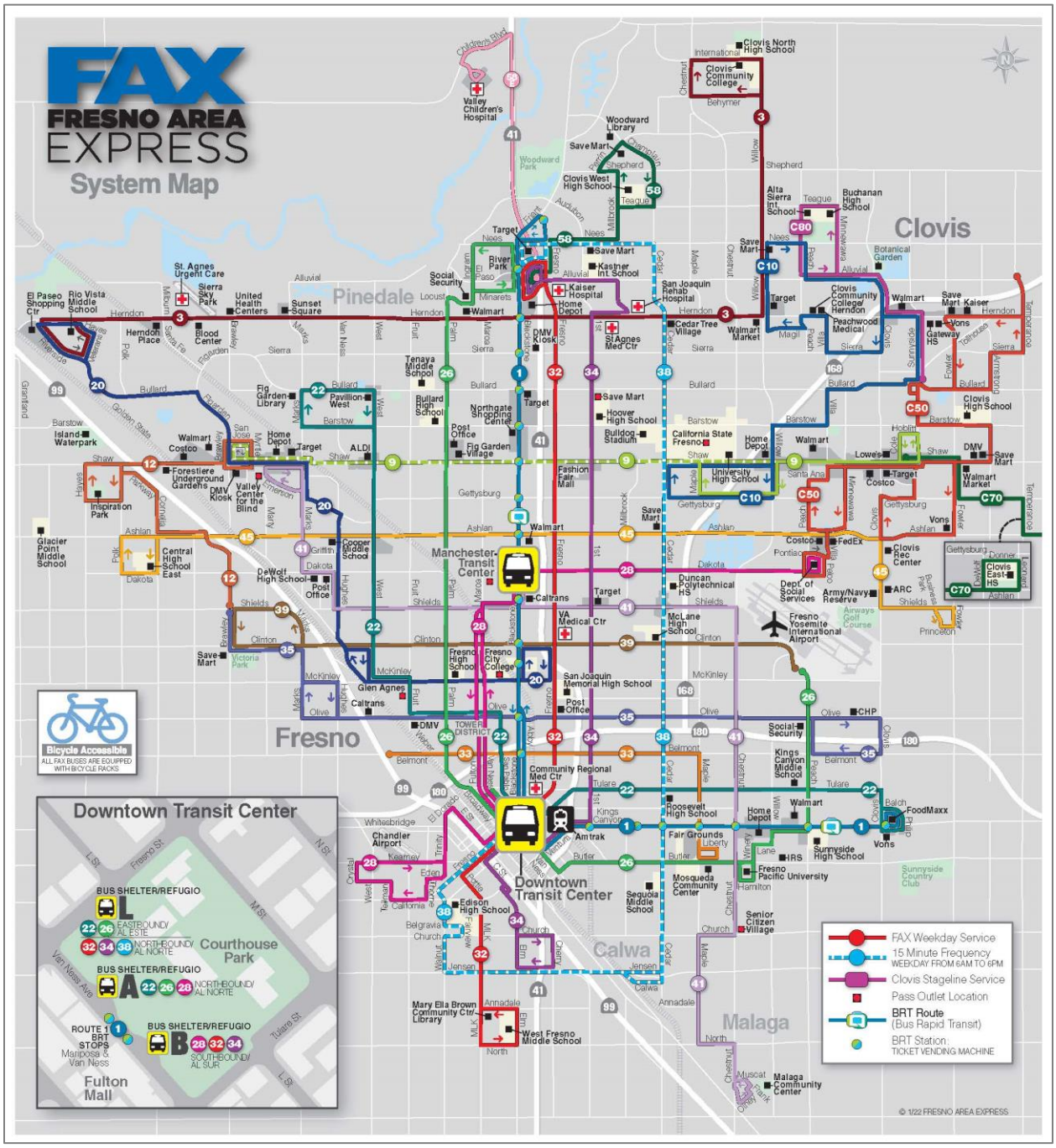
There are three major public transit operators that serve the residents in the city and county of Fresno. The City of Fresno's Fresno Area Express (FAX) is the largest transit operator, offering high capacity fixed-route services and a demand responsive service for disabled riders (Handy Ride). The City of Clovis' Stageline offers four fixed routes with 30-minute headways, limited weekend fixed-route service, and a demand responsive paratransit service (Round Up). In smaller cities and rural communities, the Fresno County Rural Transit Agency (FCRTA) provides limited fixed route service and demand responsive services within and between communities through several community-focused transit subsystems. FCRTA links to FAX and Stageline services in the Fresno-Clovis Metropolitan Area (FCMA).

Fresno residents are primarily served by FAX, operated by the City of Fresno. FAX operates on a modified grid system and provides service on 18 transit routes on weekdays and weekends. The fixed route system consists of 10 lines that provide service in a predominantly north-south direction, seven east-west cross-town lines, and a 15.7-mile Bus Rapid Transit (BRT) line that operates on Blackstone Avenue from north Fresno to Downtown and on Ventura/Kings Canyon from Downtown to Clovis Avenue. In addition to the BRT, FAX operates 15-minute frequencies on Route 9 (Shaw Avenue), Route 34 (First Street), and Route 38 (Cedar Avenue). To better serve residents in neighborhoods on the fringe, FAX recently extended Route 45 farther into West Fresno and extended Route 34 farther into South Central Fresno. They also recently upgraded Route 34 to a 15-minute frequency route. The system is designed to facilitate bus travel by making transfers convenient between intersecting lines and between seven lines that converge Downtown at Courthouse Park. The FAX system map is shown in **Figure 1E-3.19**. Note that the figure does not reflect the most recent extensions of Routes 34 and 45 into West and South Central Fresno.

FAX generally serves the Fresno-Clovis Metropolitan Area. Within the city of Fresno, FAX is strongly connected to the Central Business District. The Central Business District is the local and regional governmental center for federal, state, county, city, and educational offices, and contains the Community Regional Medical Center and a regional shopping center (Fulton Street). The Fresno Convention Center, two major hotels, various private office buildings, Amtrak, the regional bus station, and the future high-speed rail station, are also located in this area. Seven of FAX's 18 routes converge in the Central Business District and other routes serve several other regional centers of employment. Residents living on the fringe of the city experience barriers to public transportation access as there are fewer routes available in these areas. The fringe includes both disadvantaged neighborhoods which are more strongly reliant on public transportation and high resource neighborhoods in North, Northwest, and East Fresno.

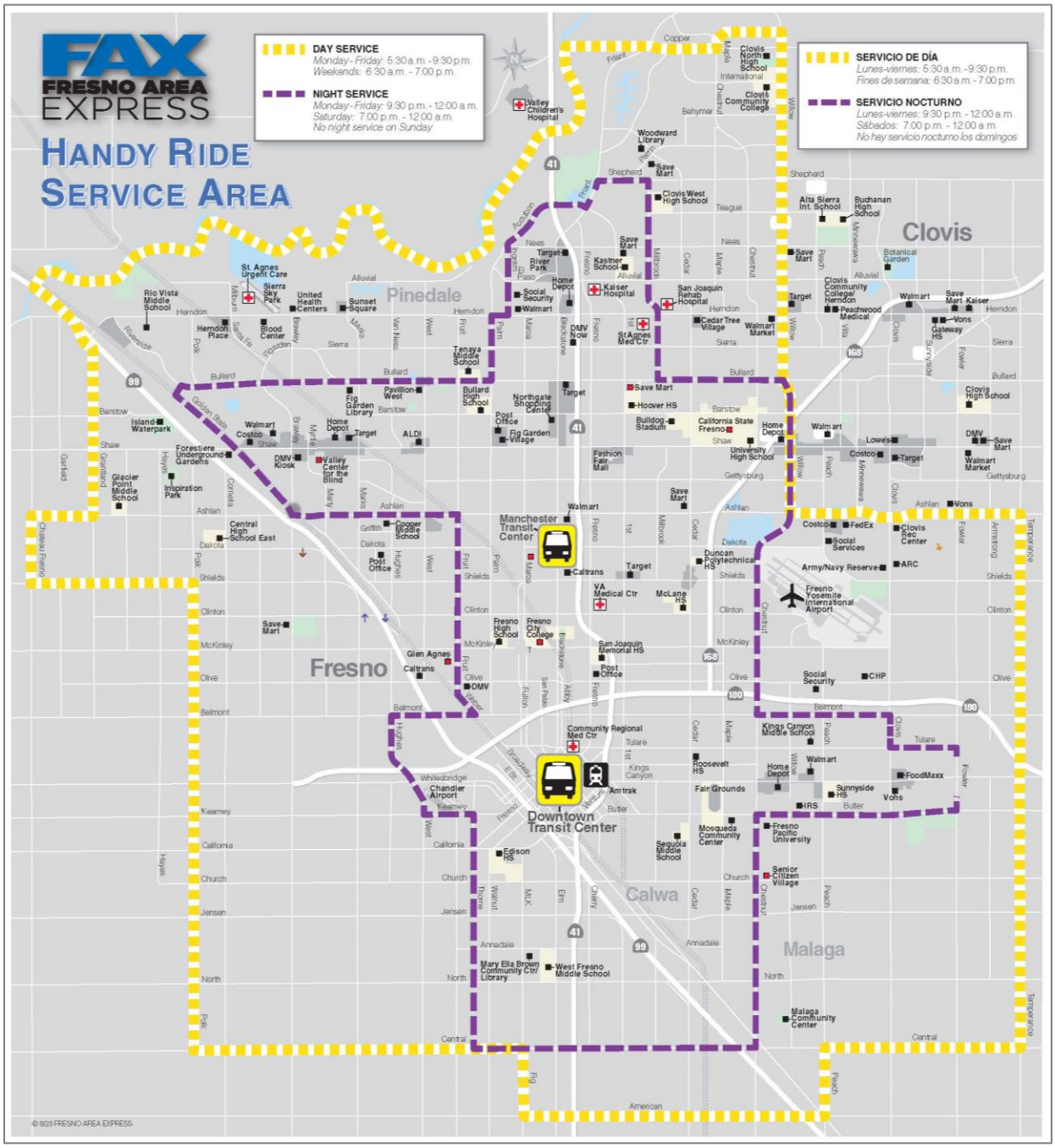
FAX Handy Ride is a shared ride, curb-to-curb service, provided from any origin to any destination throughout the service area for any trip purpose. The accommodation service was designed to meet the transportation needs of eligible persons with disabilities who cannot functionally use the FAX City bus system. Service hours for Handy Ride mirror those of FAX fixed route service, and reservations are required one day in advance of the scheduled trip to comply with ADA regulations. A limited number of will calls are provided each day based on availability, with priority going to medical appointments. FAX is in full compliance with the ADA. The Handy Ride service area mirrors the FAX fixed route service area plus three-quarters of a mile. The service area for Handy Ride is shown in **Figure 1E-3.20.** The current service area is bounded by Copper Avenue on the north, Central Avenue on the south, Grantland/Polk Avenue on the west, and Willow/Temperance Avenue on the east.

Figure 1E-3.19: Fresno Area Express (FAX) System Map



Source: City of Fresno, Department of Transportation, 2022.

Figure 1E-3.20: Handy Ride Service Area Map, 2023



Source: City of Fresno, Department of Transportation, 2023.

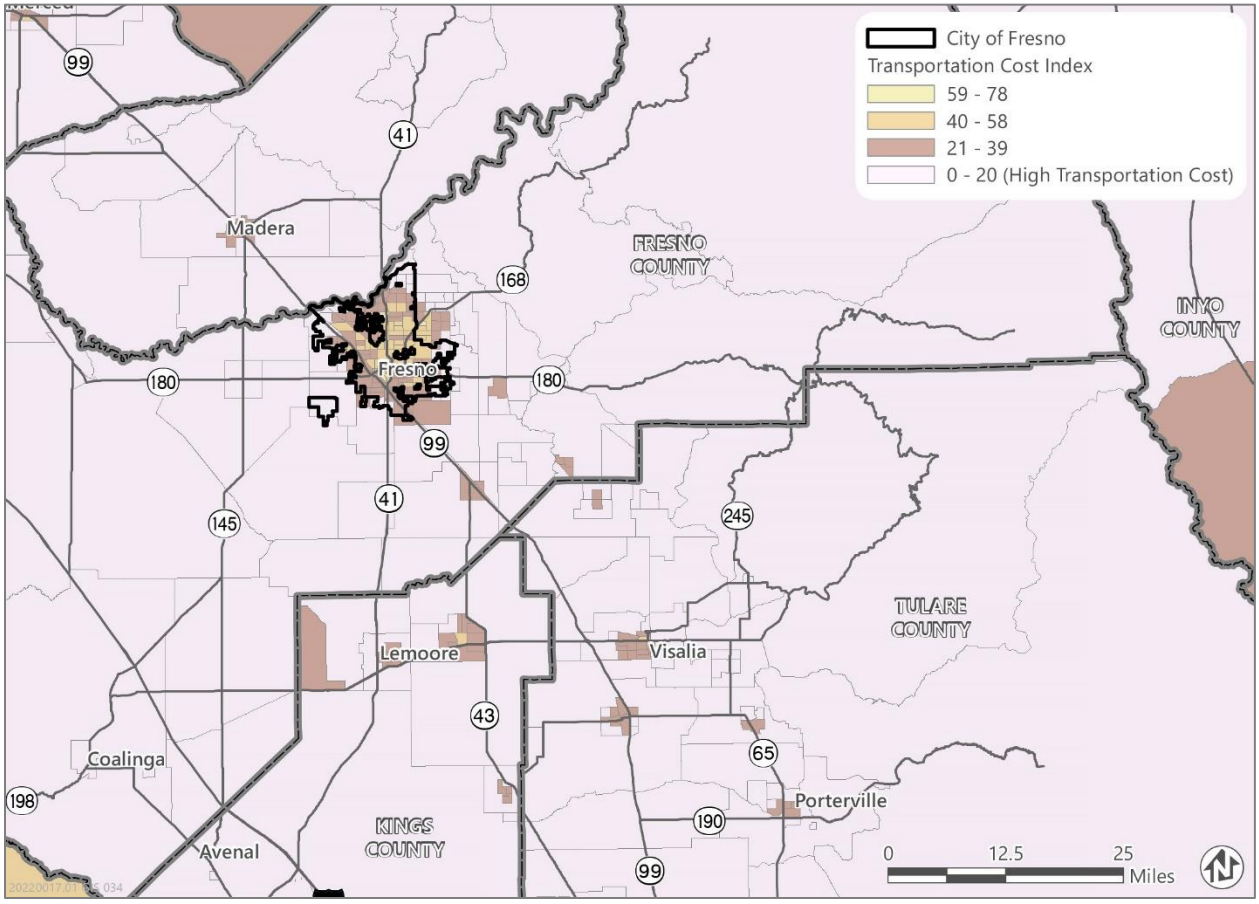
Figure 1E-3.21 displays HUD's Transportation Cost Index for the region and **Figure 1E-3.22** displays a closer look at index scores in the city of Fresno. While access to low-cost transportation is moderate and relatively uniform throughout most neighborhoods in the city, block groups in Downtown, proximate to the Yosemite International Airport and CSU Fresno campus, and in centrally located established neighborhoods have lower transportation cost levels with the lowest levels located at the major transportation hubs of Herndon and Blackstone Avenues and the Central Business District in Downtown. Higher transportation costs exist in neighborhoods that are on the fringe of the city. According to the 2020 Analysis of Impediments, transit usage is highest in South and West Fresno and lowest in the city's most northern block groups. Within the region, Black or African American, Hispanic, and Asian or Pacific Islander populations below the poverty line use public transportation more than White populations. Overall low levels of transit performance in Fresno combined with moderate levels of access indicates potential challenges for residents without access to vehicles in accessing needed services and amenities. Transit fares in the city are now the lowest they have ever been, with expanded free fares to children under 12 and Veterans/Active Military. As part of the Zero Fare Clean Air Act, on May 13, 2022, Kaiser Permanente Fresno awarded grant funds to FAX to subsidize fares for Reduced Fare riders. Reduced Fare riders include seniors 65 or older with ID, Medicare card holders, and persons with disability placards. This project is supported by Kaiser Permanente Northern California Community Benefit Programs. Then in January 2023, Fresno State University, State Center Community College District, and Fresno Unified School District started subsidizing transit fares for students, faculty, and staff. Despite this, there are still barriers to mobility for residents, particularly those living on the fringe of the city. Barriers include lengthy travel times due to long bus wait times, lack of direct routes, and route limitations requiring residents to use multiple modes of transportation to reach their first and last stop. High transportation costs also contribute to overall low levels of affordability in Fresno. For a typical household in Fresno, combined housing and transportation, makes up an estimated 61 percent of household income according to the 2020 Analysis of Impediments to Fair Housing Choice. For a moderate-income household in the region, the proportion jumps to 71 percent. Notably, combined housing and transportation costs are lower closer to the city center and are generally higher further out from the city.

According to comments received during the public review process for the Draft Housing Element, other issues related to transit mobility in the city are:

- Inadequate and/or absent infrastructure to facilitate safe and efficient active transportation, including but not limited to sidewalks, curbs, stormwater drainage, streetlights, crosswalks, and protected bike lanes.
- Inadequate and/or absent protection from extreme weather, including climate-related weather events, such as extreme heat and flooding, that impact walking, biking, and public transportation use. This includes but is not limited to the availability of shade (e.g., trees, structures), shelter, sidewalks, and stormwater drainage.
- The presence of high volumes of traffic, including heavy-duty truck traffic, on roadways used by pedestrians or bicyclists, including in and near areas zoned for industrial land uses and along designated truck routes.

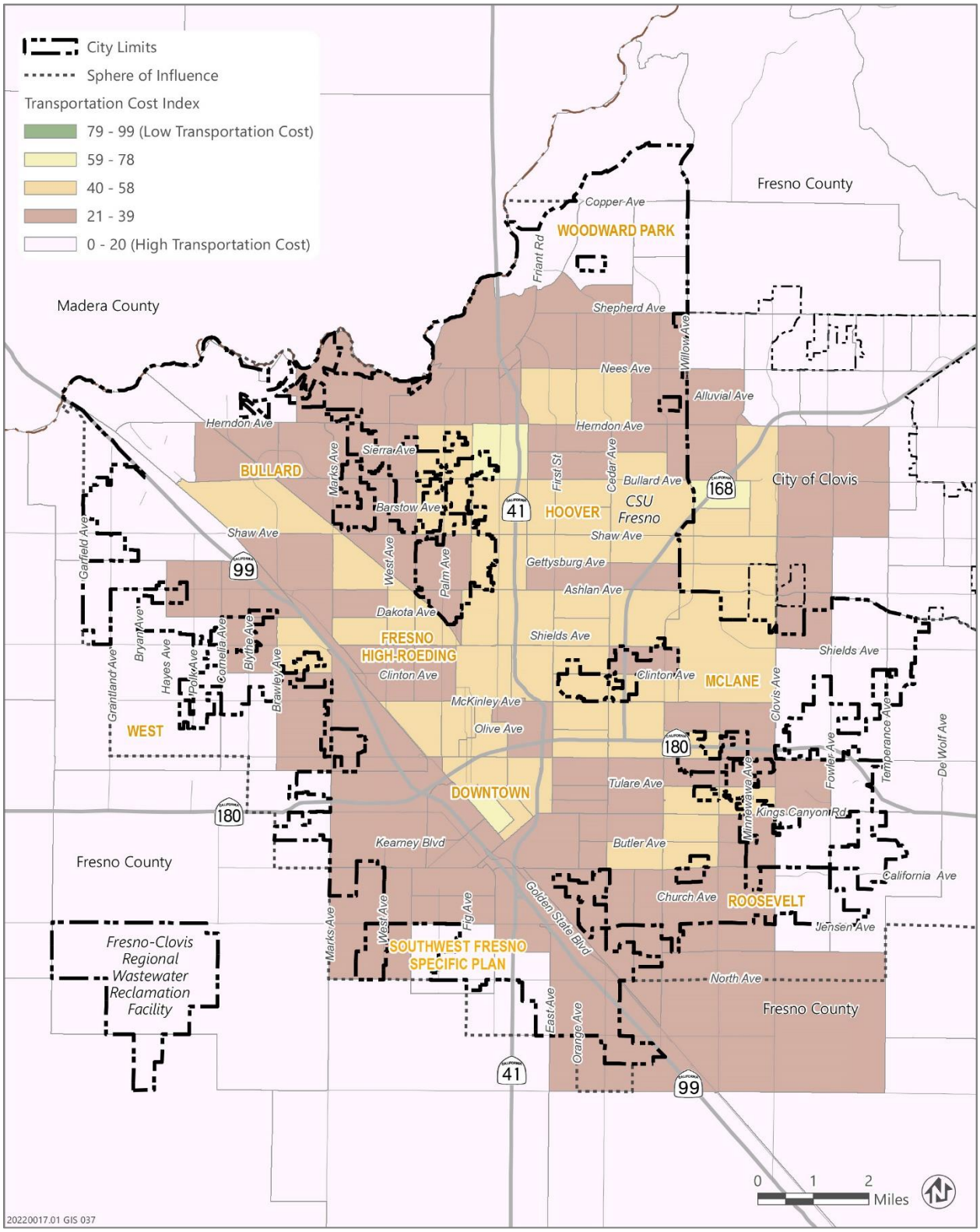
To address these issues, the Housing Element includes a program to direct investments to address infrastructure and public service deficiencies in high-need areas including areas classified as high segregation and poverty, low resource, and moderate resource in **Figure 1E-3.14**. As funding allows, the City will prioritize neighborhood infrastructure improvements such as water, sewer, curbs, gutters, sidewalks, streets, curb ramps, driveway approaches, curb cuts, and streetlights in areas of greatest needs in coordination with new residential developments.

Figure 1E-3.21: Transportation Cost Index, Fresno County Region, 2017



Source: Data downloaded from the HCD AFFH Data Tool in 2021. Based on 2013-2017 HUD Low Cost Transportation Index.

Figure 1E-3.22: Transportation Cost Index, Fresno, 2017



Source: Data downloaded from the HCD AFFH Data Tool in 2021. Based on 2013-2017 HUD Low Cost Transportation Index.

Environmental Health and Opportunity

CalEnviroScreen was developed by the California Environmental Protection Agency (CalEPA) to evaluate pollution sources in a community while accounting for a community's vulnerability to the adverse effects of pollution. Measures of pollution burden and population characteristics are combined into a single composite score that is mapped and analyzed. Higher values on the index indicate higher cumulative environmental impacts on individuals arising from these burdens and population factors.

The California Office of Environmental Health Hazard Assessment (OEHHA) compiles these scores to help identify California communities disproportionately burdened by multiple sources of pollution. In addition to environmental factors (pollutant exposure, groundwater threats, toxic sites, and hazardous materials exposure) and sensitive receptors (seniors, children, persons with asthma, and low birth weight infants), CalEnviroScreen also considers socioeconomic factors such as educational attainment, linguistic isolation, poverty, and unemployment. The TCAC Environmental Health Index summarizes this into a map to identify potential exposure to harmful toxins at a neighborhood level. Index values range from 0 to 100 and the higher the index value, the less exposure to toxins harmful to human health. Therefore, the higher the value, the better the environmental quality of a neighborhood, where a neighborhood is a census block-group.

Fresno has long struggled with environmental, health, and economic disparities, including high concentrations of poverty, air pollution, and toxin and pesticide exposure. In Fresno, lower-income housing and racially segregated communities are disproportionately impacted by a combination of locational factors such as proximity to landfills, freeways, industrial areas, and other toxins and pollutants. There are a number of historical disparities that exist between north and south Fresno. [16] The life expectancy of residents in south Fresno is significantly lower than that of residents living in the northern part of town. Southwest Fresno specifically has been recognized as one of the most pollution-burdened communities in the state. According to a study published in 2018 by the National Center for Health Statistics and the National Association for Public Health Statistics, the life expectancy of residents in south and central Fresno was 77 years, compared to 85 years for residents in northern Fresno. The outbreak of COVID-19 worldwide also disproportionately impacted POC in Fresno. Social determinants of health (e.g., income level, occupation, access to health care, and living conditions, which includes housing and built environment) have not only contributed to higher rates of underlying medical conditions for POC in Fresno, but also increased their risk of contracting the virus, being hospitalized, and dying from COVID-19.[17]

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[16] Martinez, N. 2021. Tale of Two Cities: Environmental Injustice in Fresno. Accessed via: https://fresnoalliance.com/tale-of-two-cities-environmental-injustice-in-fresno/#:~:text=According%20to%20a%20study%20published,for%20residents%20in%20northern%20Fresno.

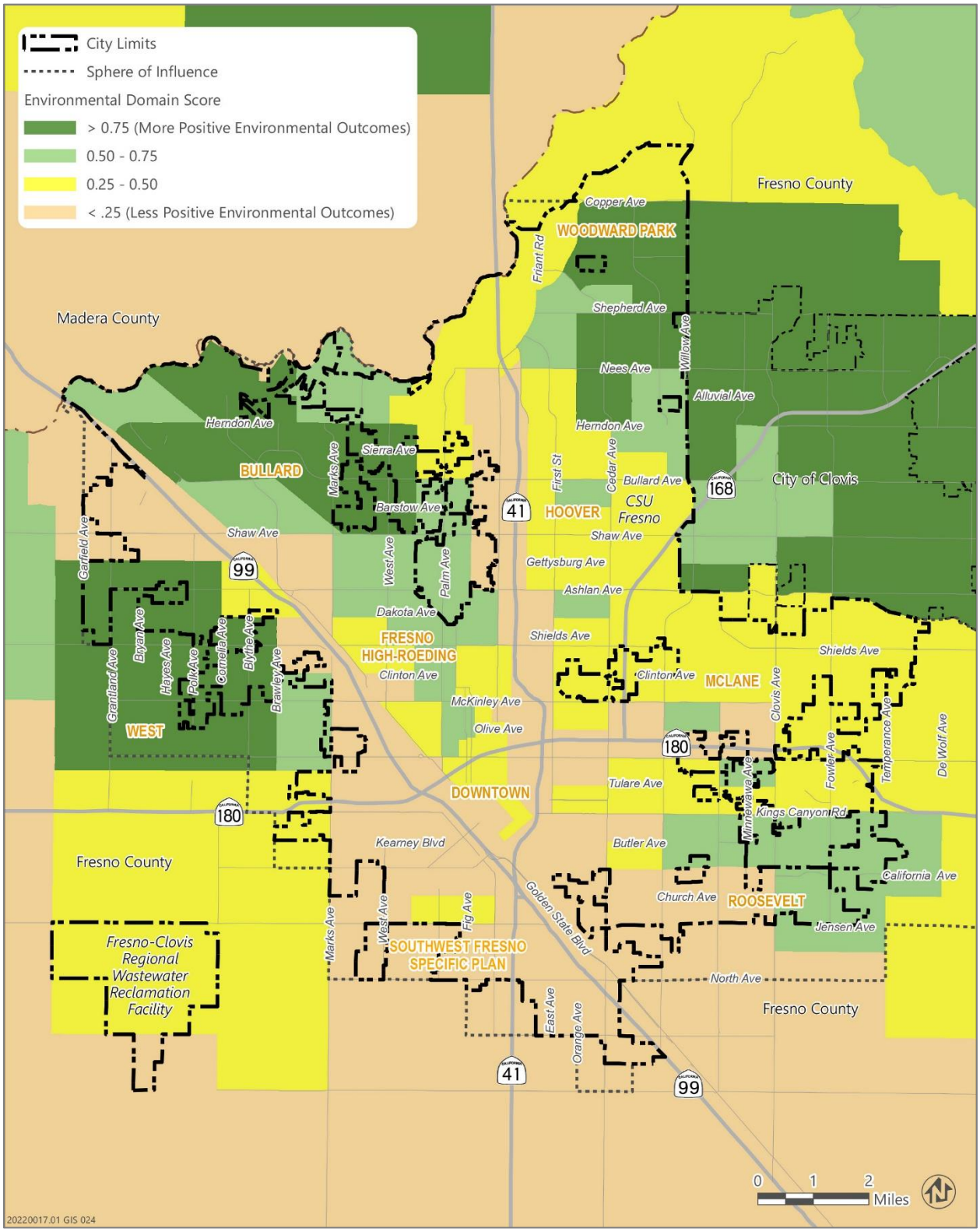
[17] Centers for Disease Control and Prevention (CDC), 2021. Megally, H., Pacheco-Werner, T., Mireles, D., Celedon, S., Frost, B., Sataraka, J., Williams, K., Davies-Balch, S., Mendoza, S., Banerjee, S., Chan, S., Dhaliwal, S., Ward, L., Silva-Aguilar, Y., & Gasga, L. *A Neighborhood Approach to Mitigate COVID-19 Transmission in BIPOC and People with Disabilities: Benefits and Lessons Learned Using the Community Health Worker Model.* (2021) Central Valley Health Policy Institute. California State University, Fresno.

Figure 1E-3.23 maps TCAC Environmental Health Index scores for Fresno. Most block groups in the city of Fresno score poorly. The highest environmental health scores in the city can be found in the city's most northern block groups, which include high proportions of open space and residential land uses. In contrast, the lowest scoring tracts are in south Fresno that also have lower access to opportunity. Fresno County is a major agricultural producer and agricultural production processes harm water supply and quality by discharging fertilizer contaminants into the groundwater via runoff. Over time, the region's water supply has contended with a wide range of contaminants, including nitrates, arsenic, and pesticides. Due to geographic, topographic, meteorologic, and environmental conditions, the region's air basin has particular challenges for air quality. These factors and others contribute to the environmental problems in Fresno including its role as the region's center for agricultural industry and its location as the intersection of several major state highways. Topographically, low elevations in the Central Valley trap emissions from commuter vehicles and logistics vehicles like semi-trucks, along with high levels of pollutants from farming and pesticide use. Until 2004, farmers in the region would routinely burn tons of debris at the end of a growing season, which generated large amounts of particulate matter in the air. While agricultural burning has decreased, it has not been phased out completely.[18] The Central Valley also experiences above average temperatures, especially in the summer, when ozone pollution becomes much worse due to the longer periods of time ozone can develop in the sunlight. Regional and state forest fires also contribute to poor air quality during the summer and fall. Smoke and particles from the fires tend to accumulate and build up along the base of the mountains to the north and east of the city severely impacting Fresno's air quality especially for those living in north and east Fresno. As a result of these conditions, many residents suffer from respiratory illness and poor health outcomes.

As described in the Regional Fair Housing Assessment, much of Fresno County, particularly the western area and the cities along the State Route 99 corridor, have high cumulative CalEnviroScreen scores, see **Figure 1E-3.24**. This is a result of high scores for indicators of pollution burden, primarily pesticides, drinking water contaminants, particulate matter, diesel particulate matter, toxic releases from facilities, hazardous waste, and ozone. Fresno also suffers from some of the highest asthma, low birth weight, and cardiovascular disease levels in the state.

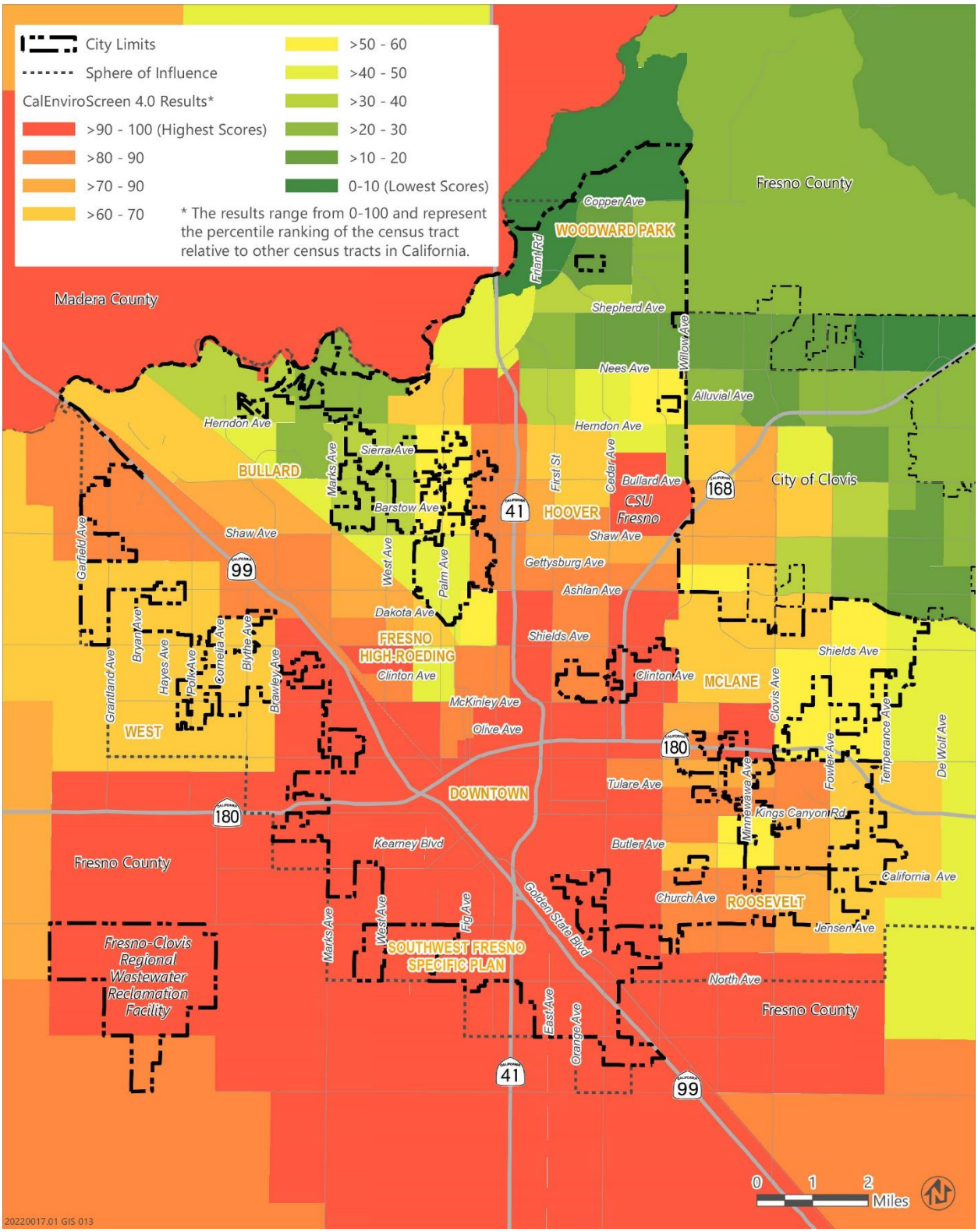
[18] Benner, C. and Pastor, M. 2015. Equity, Growth, and Community: What the Nation Can Learn from America's Metro Areas. "Struggle and the City: Conflict-Informed Collaboration." University California Press. Pp. 130-160. Accessed via: https://www.jstor.org/stable/10.1525/j.ctt1ffjnd4.9.

Figure 1E-3.23: TCAC Opportunity Areas – Environmental Score, Fresno, 2022



Source: Data downloaded from the HCD AFFH Data Tool in 2021. Note that this data is based on 2021 TCAC Opportunity Areas as the 2022 data by indicator is not yet available through the HCD AFFH Tool.

Figure 1E-3.24: CalEnviroScreen 4.0 Scores, Fresno



Source: Data downloaded from the Office of Environmental Health and Hazard Assessment in 2022.

Citywide, the average Fresno resident has more exposure to air pollution than nearly 70 percent of census tracts nationwide and adult asthma rates are higher in Fresno than both the state and nation overall.[19] Spatial patterns of Environmental Health Index scores and residential patterns by race/ethnicity show that there are varying levels of disparity among racial and ethnic groups with regard to environmental quality. Hispanic, Black or African American, and Asian or Pacific Islander populations that live below the poverty line in the city are exposed to the worst environmental health conditions.[20] As shown in the figure below, nearly all of the census tracts with the highest CalEnviroScreen 4.0 score results align with predominantly Hispanic neighborhoods that have high POC segregation or low-medium rates of segregation. In the established neighborhoods north and south of Shaw Avenue near the Hoover planning area, residential patterns are more balanced and integrated, but environmental health scores are still poor. Policies and land use decisions which have affected these patterns will be described in further detail later in this chapter (see "Other Relevant Factors and Local Knowledge").

SB 535 Disadvantaged Communities

A disadvantaged community (DAC) or environmental justice community (EJ Community) is identified by the California Environmental Protection Agency (Cal EPA) as "areas that are disproportionately affected by environmental pollution and other hazards that can lead to negative health effects, exposure, or environmental degradation," and may or may not have a concentration of low-income households, high unemployment rates, low homeownership rates, overpayment for housing, or other indicators of disproportionate housing need. Disadvantaged communities in California are specifically targeted for investment of proceeds from the state's Cap-and-Trade Program. These investments are aimed at improving public health, quality of life and economic opportunity in California's most burdened communities, and at the same time, reducing pollution that causes climate change.

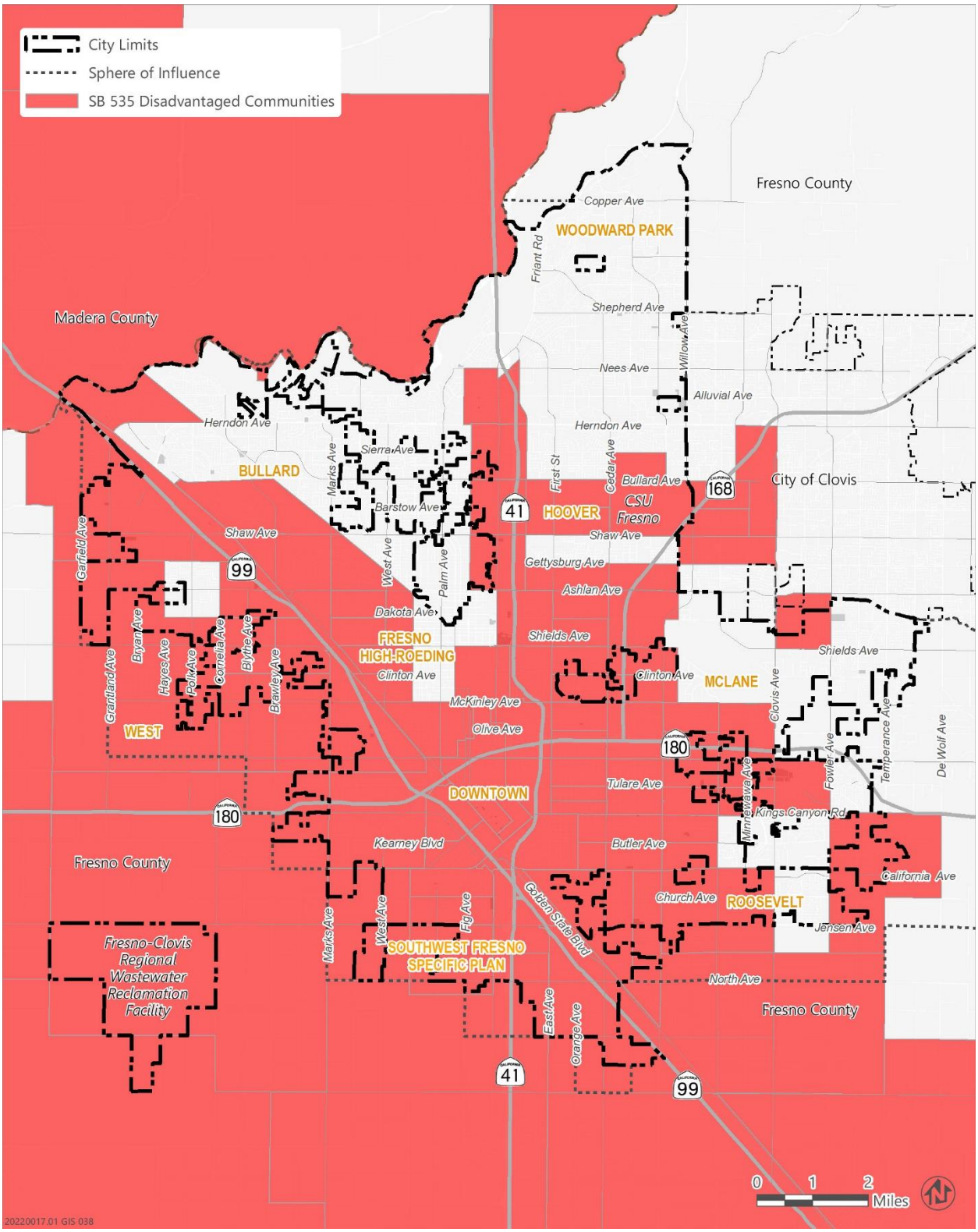
In the CalEnviroScreen tool, census tracts receiving the highest 25 percent of overall scores in CalEnviroScreen 4.0 are those that have been designated as disadvantaged communities under Senate Bill (SB) 535. The cumulative score that can result in a disadvantaged community designation is calculated based on individual scores from two groups of indicators: Pollution Burden and Population Characteristics. Pollution Burden scores exposure to negative environmental hazards, such as ozone concentrations; fine inhalable particles, with diameters that are generally 2.5 micrometers and smaller (PM2.5) concentrations; drinking water contaminants; lead risk from housing; traffic impacts; and more. Population Characteristics scores the rate of negative health conditions and access to opportunities, including asthma, cardiovascular disease, poverty, unemployment, and housing cost burden. For each indicator, as with the cumulative impact, a low score reflects positive conditions. The designation takes into account the latest and best available data and considers factors related to data unavailability. Other qualifying criteria for a disadvantaged community includes:

[19] PolicyLink, 2017. Advancing Health Equity and Inclusive Growth in Fresno County. Accessed via: https://www.policylink.org/sites/default/files/advancing-health-equity-and-inclusive-growth-in-fresno.pdf
[20] Ibid

- Census tracts lacking overall scores in CalEnviroScreen 4.0 due to data gaps, but receiving the highest 5 percent of CalEnviroScreen 4.0 cumulative pollution burden scores.
- Census tracts identified in the 2017 DAC designation as disadvantaged, regardless of their scores in CalEnviroScreen 4.0.
- Lands under the control of federally recognized Tribes. For purposes of the DAC designation, a Tribe may establish that a particular area of land is under its control even if not represented as such on CalEPA's DAC map and therefore should be considered a DAC.

The San Joaquin Valley has the most disadvantaged communities per capita statewide. As shown in **Figure 1E-3.25**, in the city of Fresno specifically, nearly 70 total tracts in Fresno are considered a SB 35 DAC, comprising an estimated 85 percent of the city's land area. Fresno also has several tracts that scored in the highest 5 percent of CalEnviroScreen scores which is likely attributed to the fact that there are two National Priorities List (NPL) Superfund sites within the city of Fresno include the 145-acre Fresno Municipal Sanitary Landfill in southwest Fresno and the half-acre Industrial Waste Processing site in north Fresno. The 5-acre T.H. Agriculture & Nutrition Company site, a deleted NPL site in the city, was removed from the NPL in 2006 following cleanup. A Superfund site is any land in the United States that has been contaminated by hazardous waste and identified by the Environmental Protection Agency (EPA) as a candidate for cleanup because it poses a risk to human health and/or the environment. One NPL site exists immediately outside of the city of Fresno in the community of Malaga. The EPA also manages a Toxics Release Inventory (TRI) to track the management of certain toxic chemicals that may pose a threat to either human health or the environment. There are 18 industrial facilities in Fresno that must report annually how much of each chemical is recycled, combusted for energy recovery, treated for destruction, and disposed of or otherwise released on- and off-site. This information is collectively referred to as production-related waste managed. The facilities are clustered in south and west Fresno.

Figure 1E-3.25: SB 535 Disadvantaged Communities



Source: Data downloaded from the HCD AFFH Data Tool in 2021. Data is based on CalEnviroScreen 4.0 Scores from the Office of Environmental Health and Hazard Assessment in 2022.

Housing Mobility

Housing mobility refers to an individual's or household's ability to secure affordable housing in areas of high opportunity, move between neighborhoods, and purchase a home if they so choose. A few indicators of housing mobility include availability of rental and ownership opportunities throughout the jurisdiction, vacancy rates, distribution of Housing Choice Vouchers (HCVs), and housing costs and affordability.

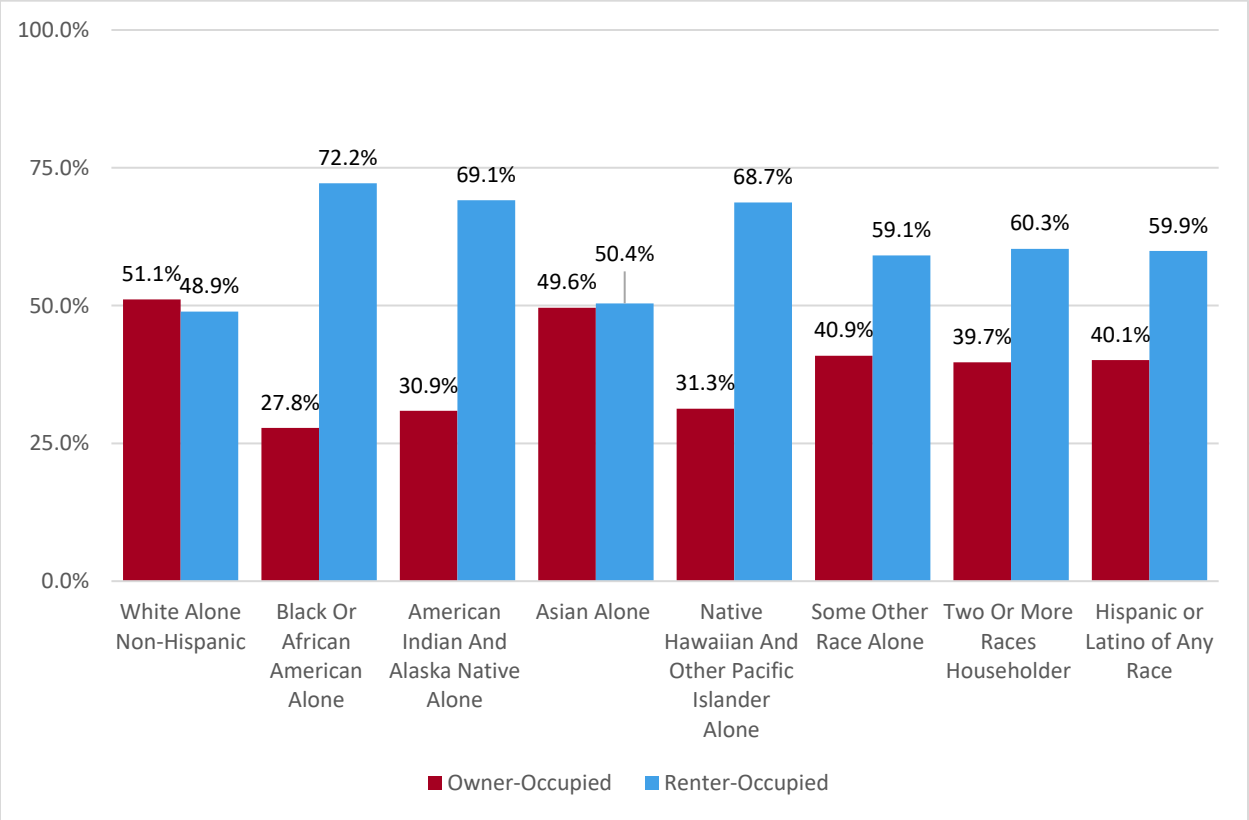
Tenure and Rates of Homeownership

One of the most prevalent consequences of residential segregation is the intergenerational inaccessibility of homeownership. Homeownership is typically the largest asset of most households in the U.S. and hugely impacts generational wealth, as it is contingent upon passing down assets. For low-income families, maintaining homeownership provides an opportunity for future generations to progress their wealth by increasing the family's equity. Systems of institutional racism created through federal housing policies and discriminatory mortgage lending practices prior to the Fair Housing Act of 1968, along with insufficient access to credit, have had significant impacts on the homeownership rates of racial and ethnic minorities — particularly Black or African American and Hispanic populations.[21] These discriminatory practices will be described in further detail later in this section (see "Other Relevant Factors and Local Knowledge").

According to the 2016-2020 American Community Survey, there are 170,137 households in Fresno. Approximately 46.8 percent of households own their homes. Homeownership rates are highest for White (51.1 percent) and Asian households (49.6 percent). About 40.1 percent of Hispanic households in the city own their homes while Black or African American (27.8 percent), American Indian or Alaska Native (30.9 percent), and Native Hawaiian and other Pacific Islander residents (31.3 percent) have the lowest homeownership rates (see **Figure 1E-3.26**).

[21] Reid, C. 2021. Crisis, Response, and Recovery: The Federal Government and the Black/White Homeownership Gap. Terner Center for Housing Innovation. Available via: https://ternercenter.berkeley.edu/research-and-policy/crisis-response-and-recovery-the-federal-government-and-the-black-white-homeownership-gap/

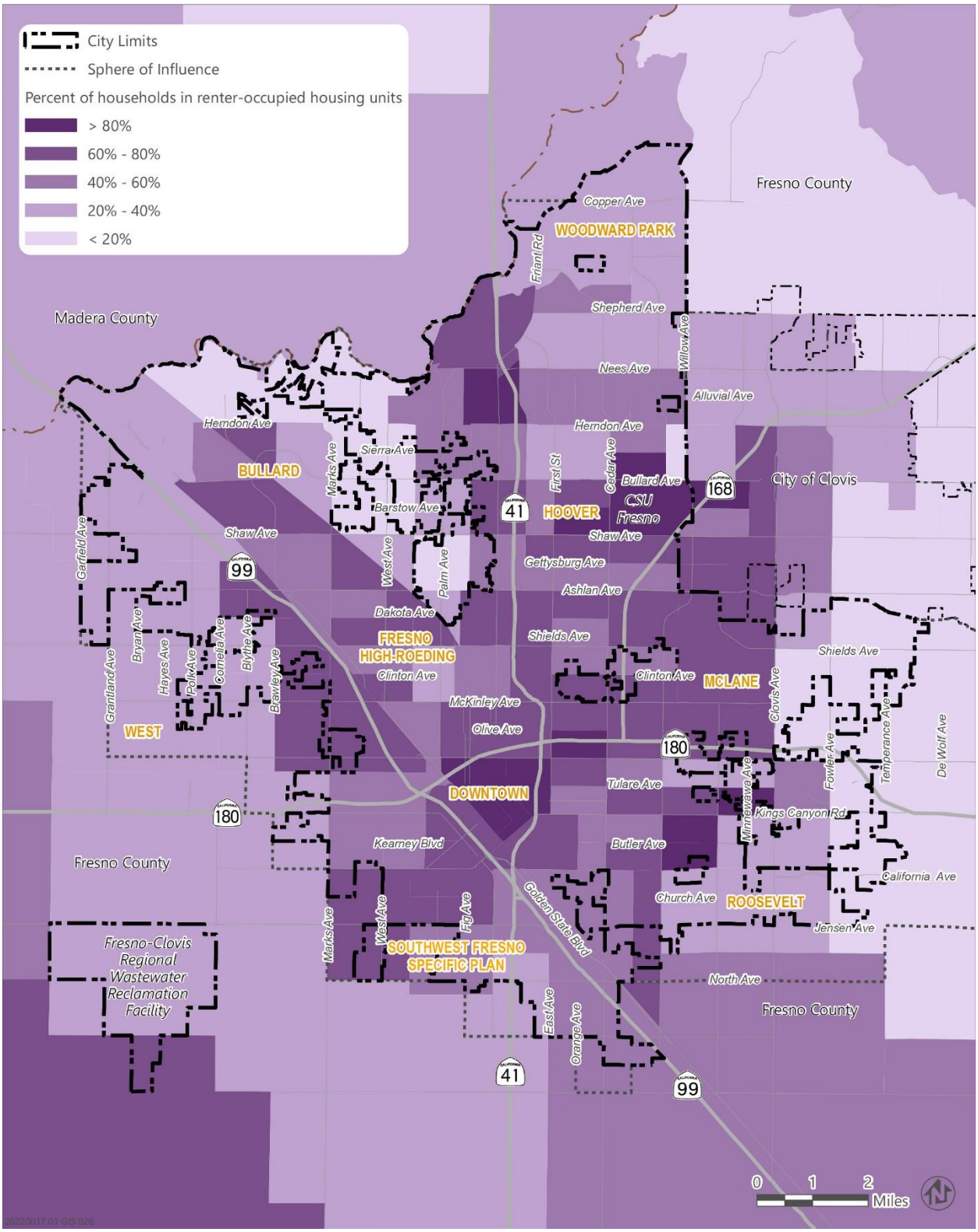
Figure 1E-3.26: Housing Tenure by Race and Hispanic Origin



Source: U.S. Census Bureau, ACS 16-20 (5-year Estimates), Table B25003

Figure 1E-3.27 shows the distribution of renter-occupied households in the city and indicates that renters are more predominant in central Fresno. Areas where the percentage of renters exceeds 80 percent are near Fresno State University, Downtown, southeast Fresno, and in the Pinedale neighborhood of north Fresno. Conversely, there is low renter occupancy and homeownership is more prevalent in southeastern Fresno along north and south Fowler Avenues.

Figure 1E-3.27: Renter Households in Fresno, 2019



Source: Data downloaded from the HCD AFFH Data Tool in 2021.

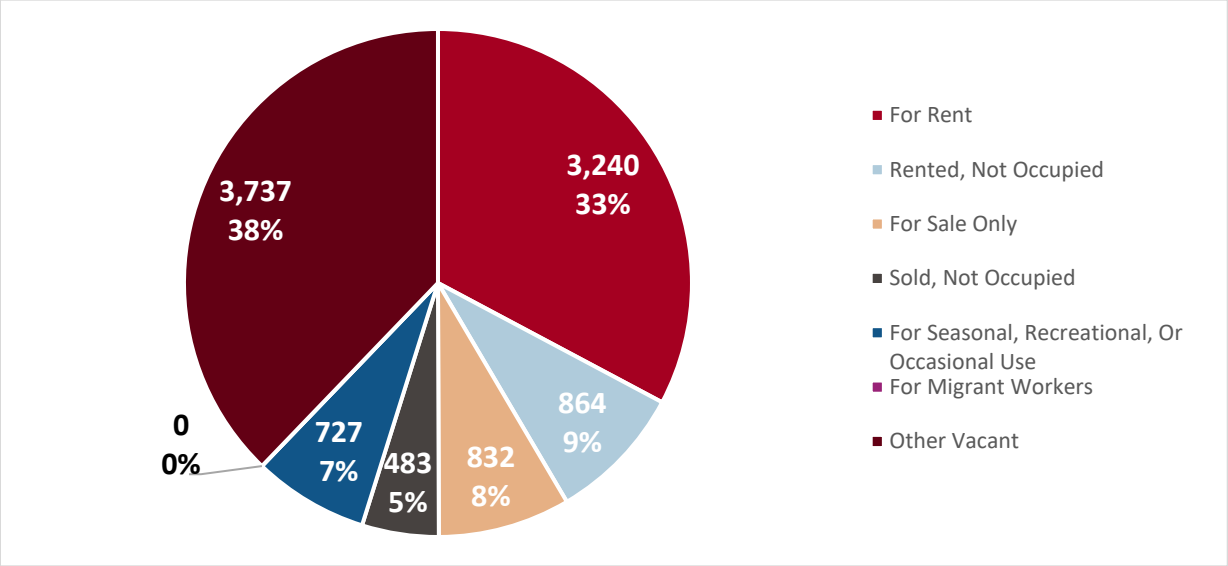
Housing Supply Summary

According to the 2016-2020 American Community Survey, there are 180,020 housing units in Fresno, which represents an increase of 5.1 percent since 2010 and 20.8 percent since 2000.

Vacancy Rates

Of Fresno's total housing units, 95.5 percent are occupied, and 5.5 percent are vacant. Vacancies in Fresno County are at 7.0 percent of all housing units. The vacancy rate, calculated from ACS data, includes housing that is available for sale or rent, housing that has been rented or sold but not yet occupied, seasonal housing, and other vacant units. **Figure 1E-3.28** displays the total number of vacant units in Fresno by type. Note the categories are determined by the U.S. Census Bureau.

Figure 1E-3.28: Vacant Units by Type, City of Fresno, 2020



Source: U.S. Census Bureau, ACS 16-20 (5-year Estimates), Table B25004

Seasonal, Recreational, or Occasional Use units are typically used or intended for use only in certain seasons or for weekends or other occasional use throughout the year. Seasonal units include those used for summer or winter sports or recreation, such as beach cottages and hunting cabins. Seasonal units also may include quarters for such workers as herders and loggers. Interval ownership units, sometimes called shared-ownership or timesharing condominiums, also are included here. Migrant Worker units include vacant units intended for occupancy by migratory workers employed in farm work during the crop season. If a vacant unit does not fall into any of the categories specified above, it is classified as "Other vacant." For example, this category includes units held for occupancy by a caretaker or janitor, and units held for personal reasons of the owner.

Unit Sizes

Availability of housing in a variety of sizes is important to meet the needs of different demographic groups. Neighborhoods with multi-bedroom detached, single-family homes will typically attract larger families, whereas dense residential developments with smaller unit sizes and fewer bedrooms often accommodate single-person households or small families. But market forces and affordability impact housing choice and

the ability to obtain housing of a suitable size, and markets that do not offer a variety of housing sizes at different price points can lead to barriers for some groups. Rising housing costs can, for example, lead to overcrowding as large households with lower incomes are unable to afford pricier, larger homes and are forced to reside in smaller units. On the other hand, people with disabilities or seniors with fixed incomes may not require large units but can be limited by higher housing costs in densely populated areas where most studio or one-bedroom units are located.

Table 1E-3.5 summarizes housing units in Fresno by size and tenure. Housing units with two- and three-bedrooms represent the largest share of renter-occupied units in Fresno (approximately 65 percent). Three- and four-bedroom units represent the largest share of owner-occupied units (approximately 80 percent). For comparison, only 5.9 percent of renters occupy four-bedroom units, which may indicate limited choice for larger renter families. Stakeholder outreach for the 2020 Analysis of Impediments to Fair Housing in Fresno noted the need for larger, affordable units to meet the needs of large families[22].

Table 1E-3.5: Housing Tenure by Number of Bedrooms (2020)

	City of Fresno		Fresno County	
	Number of Households	Percent	Number of Households	Percent
Homeowners				
Owner - No Bedroom	614	0.8%	1,024	0.6%
Owner - 1 Bedroom	756	0.9%	1,534	0.9%
Owner - 2 Bedrooms	10,392	13.0%	19,752	11.9%
Owner - 3 Bedrooms	44,342	55.6%	91,033	54.7%
Owner - 4 Bedrooms	19,534	24.5%	43,719	26.3%
Owner - 5 or More Bedrooms	4,059	5.1%	9,358	5.6%
Owner - Subtotal	**79,697**	**46.8%**	**166,420**	**53.7%**
Renters				
Renter - No Bedroom	10,353	11.4%	12,510	8.7%
Renter - 1 Bedroom	14,720	16.3%	21,532	15.0%
Renter - 2 Bedrooms	35,433	39.2%	54,803	38.1%
Renter - 3 Bedrooms	23,789	26.3%	42,406	29.5%
Renter - 4 Bedrooms	5,346	5.9%	10,847	7.5%
Renter - 5 or More Bedrooms	799	0.9%	1,579	1.1%
Renter - Subtotal	**90,440**	**53.2%**	**143,677**	**46.3%**
Total Households	**170,137**		**310,097**	

Source: U.S. Census Bureau, ACS 16-20 (5-year Estimates), Table B25042

[22] Draft 2020 Analysis of Impediments to Fair Housing Choice Fresno. Available via: https://www.fresno.gov/darm/wp-content/uploads/sites/10/2020/02/Draft-2020-Analysis-of-Impediments-to-Fair-Housing-Choice.pdf

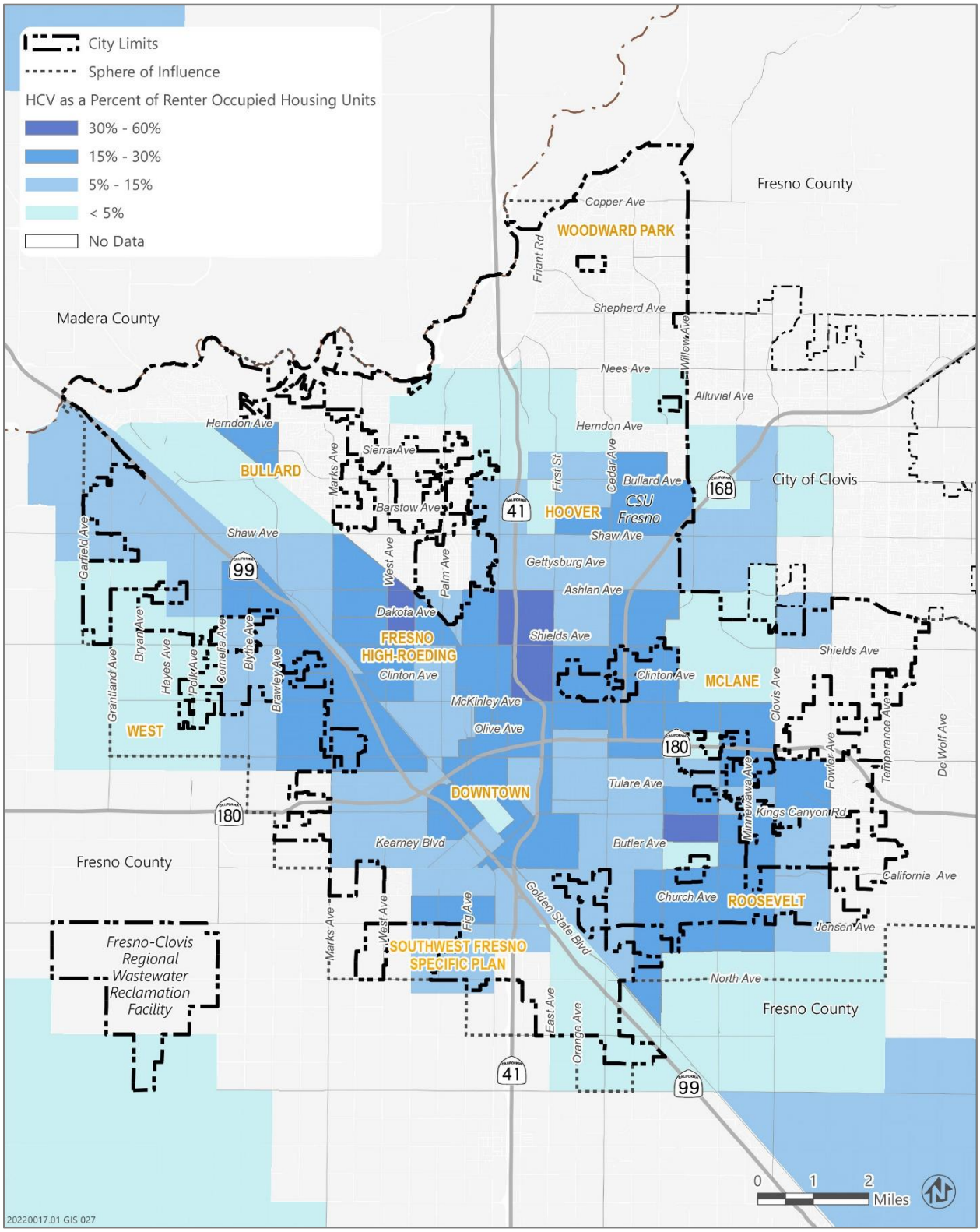
Housing Choice Voucher Usage

The Housing Choice Voucher Program (HCV, formerly Section 8) is a federally funded program that provides rental assistance through approximately 11,000 vouchers, to eligible low-income individuals and families in Fresno County. Eligible applicants who receive a voucher are responsible for finding an apartment or house in the private rental market. HCVs are portable and their distribution throughout the city is subject to fluctuate based on location preferences of individual voucher households and the participation of landlords in the HCV program. Approximately 3,000 owners of rental properties in Fresno County accept tenants who participate in the program, but HCV use is most concentrated within the city of Fresno, with rates up to 52.2 percent of households in tracts along State Route 41 and a concentration of areas with rates between 15.0 and 30.0 percent of households in the central portion of the city and along the State Route 99 corridor. The higher rates of HCV use also tend to correspond to, or are adjacent to, census tracts where public housing or subsidized housing is located.

Figure **1E-3.29** displays the rate of HCV usage in the city. HCVs are used most across west, central, and south Fresno. Central Fresno has clusters of HCV use east of State Route 41 and south of East Ashlan Avenue. In Southeast Fresno, census tracts abutting Sequoia-Kings Canyon Freeway, and further south along East Kings Canyon Road show clustering of HCV use. HCV use is also prevalent in West Fresno, south of North Santa Fe Avenue. This area, separated by railroad tracks from northwest Fresno, indicates the stark difference between northwest and northeast Fresno and the rest of the city. Northeast Fresno has very limited HCV use, with only four census tracts north of Herndon Avenue containing any HCVs, and of those four tracts, no tract exceeds 5 percent HCV use. Northwest Fresno also has limited HCV use; the single census tract north of North Santa Fe Avenue with HCV use is composed of approximately 18 percent vouchers.

A recent change to state law went into effect in January 2020 that protects HCV holders from discrimination by landlords based on their participation in the HCV program. With this new prohibition against landlords refusing HCV tenants, resources to educate northeast and northwest Fresno landlords who have traditionally not participated in the HCV program are included in the Housing Element as a way to improve and balance the distribution of HCVs in the city.

Figure 1E-3.29: Housing Choice Voucher (HCV) Usage, Fresno



Source: Data download from the HCD AFFH Data Tool in 2021.

Disproportionate Housing Needs and Displacement Risk

In the city of Fresno and Fresno county, renter-occupied households and households of color are more likely to have a housing need than White households or owner-occupied households.[23] In fact, several demographic groups experience a disproportionately greater rate of housing need compared to White households and owner-occupied households. There are four housing problems that are typically reported on to assess affordability and other types of housing needs. These are: 1) housing units that lack complete kitchen facilities; 2) housing units that lack complete plumbing facilities; 3) households that are overcrowded (i.e., more than 1.0 people per room); and 4) households that are cost burdened (i.e., monthly housing costs exceed 30 percent of monthly income). A household is said to have a housing problem if they have one or more of these four problems. A household is said to have a severe housing problem if the housing unit lacks complete kitchen or plumbing facilities and/or includes severe cost burden (more than 50 percent of monthly income is spent on housing costs) or severe overcrowding (more than 1.5 people per room). As shown in **Table 1E-3.6**, more than 80,870 households have at least one housing problem in Fresno, comprising 51 percent of all households. Of these, nearly one-third (31 percent) of all households have a severe housing problem. In the region, housing problems occur at slightly lesser rates; 137,555 households (48 percent) have at least one housing problem and 83,265 households (29 percent) have a severe housing problem.

Table 1E-3.6: Demographics of Disproportionate Housing Needs, 2017

	City of Fresno			Fresno County		
	Total Number of Households	Number with Problems	Percent with Problems	Total Number of Households	Number with Problems	Percent with Problems
Households Experiencing Any of the Four Housing Problems						
White	64,665	25,400	39.3%	126,010	46,335	36.8%
Black of African American	13,775	8,140	59.1%	15,785	9,105	57.7%
Hispanic	61,070	36,850	60.3%	118,935	67,555	56.8%
Asian Pacific Islander	15,637	8,443	54.0%	22,482	11,353	50.5%
Native American	684	445	65.1%	1,522	764	50.2%
Other	3,338	1,595	47.8%	5,100	2,455	48.1%
Total	**159,165**	**80,870**	**50.8%**	**137,555**	**289,815**	**47.5%**

23 Draft 2020 Analysis of Impediments to Fair Housing Choice Fresno. Available via: https://www.fresno.gov/darm/wp-content/uploads/sites/10/2020/02/Draft-2020-Analysis-of-Impediments-to-Fair-Housing-Choice.pdf.

	City of Fresno			Fresno County		
	Total Number of Households	Number with Problems	Percent with Problems	Total Number of Households	Number with Problems	Percent with Problems
Households Experiencing Any of the Four Severe Housing Problems						
White	64,665	13,305	20.6%	126,010	23,600	18.7%
Black or African American	13,775	5,290	38.4%	15,785	5,860	37.1%
Hispanic	61,070	24,615	40.3%	118,935	44,840	37.7%
Asian Pacific Islander	15,637	5,402	34.6%	22,482	7,121	31.7%
Native American	684	250	36.6%	1,522	429	28.2%
Other	3,338	960	28.8%	5,100	1,420	27.8%
Total	**159,165**	**49,810**	**31.3%**	**289,815**	**83,265**	**28.7%**

Note: All % represent a share of the total population.

Source: Draft Assessment of Impediments to Fair Housing Choice, Fresno, 2020. CHAS, 2017.

The highest rates of housing needs are found in census tract 54.08 around Fresno State University, census tract 25.02 along parts of Sequoia Kings Canyon Freeway that are immediately east of Downtown, and census tract 47.04 in northwest Fresno bordered by West Shields Avenue to the south, North West Avenue to the east, and West Dakota Avenue to the north. Census tracts in southwest, southeast, west, and central Fresno have elevated levels of housing problems with tracts typically having at least 50 percent of all households having at least one housing problem.

The following sections describe trends in households experiencing the greatest housing needs.

Overcrowding

A household is overcrowded if there is more than 1.0 people per room, not including kitchen or bathrooms. Severe overcrowding refers to households with more than 1.5 people per room. Nearly 11 percent of households in the city are considered overcrowded. Similar to trends across the state, overcrowding is more common among renters than homeowners. By tenure, approximately 15.3 percent of Fresno renter-occupied households are overcrowded compared to 4.4 percent of owner-occupied households are overcrowded (See **Table 1E-3.7**). This is consistent with the previously described summary of housing unit sizes which suggested that larger rental families have less housing options.

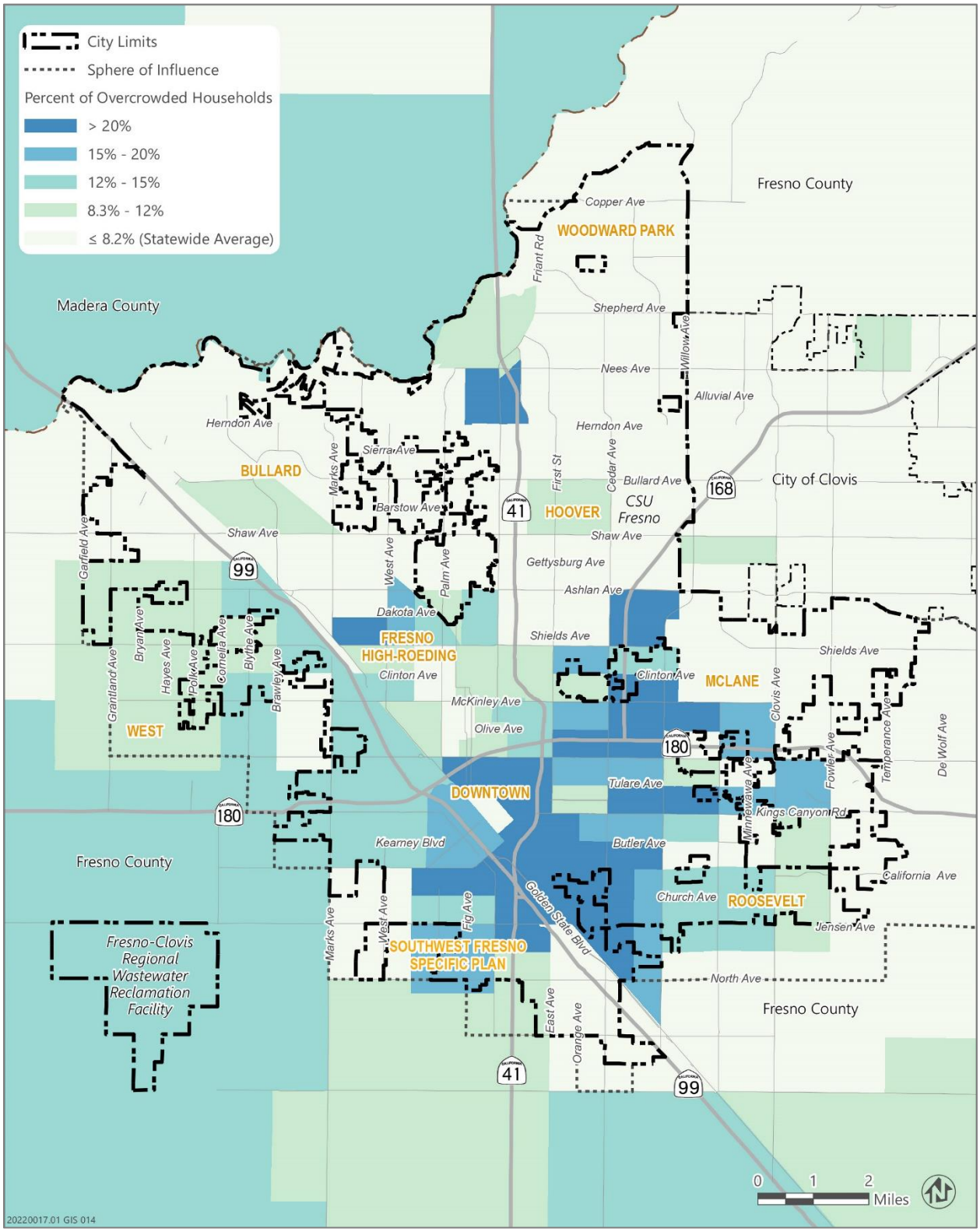
Table 1E-3.7: Tenure and Occupants per Room, Fresno, 2020

	Households	Percent
Owner Occupied		
0.50 or less occupants per room	51,937	65.2%
0.51 to 1.00 occupants per room	23,298	29.2%
1.01 to 1.50 occupants per room	3,215	4.0%
1.51 to 2.00 occupants per room	807	1.0%
2.01 or more occupants per room	440	0.6%
Total Owner Occupied Units	**79,697**	**46.8%**
Renter Occupied		
0.50 or less occupants per room	38,052	42.1%
0.51 to 1.00 occupants per room	38,522	42.6%
1.01 to 1.50 occupants per room	7,311	8.1%
1.51 to 2.00 occupants per room	3,541	3.9%
2.01 or more occupants per room	3,014	3.3%
Total Renter Occupied Units	**90,440**	**53.2%**
Total	**170,137**	**100.0%**

Source: U.S. Census Bureau, ACS 16-20 (5-year Estimates), Table B25014.

As shown in **Figure 1E-3.30**, the ACS estimates that there is a higher rate of overcrowding in Southwest Fresno and Downtown. As shown in the racial segregation and integration trends discussed previously, these areas correlate to areas with the highest rates of POC segregation. In addition, there is a greater presence of single-parent households and low levels of labor market engagement. Data indicates that there are a few areas of more severe overcrowding conditions (more than 20 percent) in the Pinedale area, around the Fresno Yosemite International Airport, in Downtown, and south of Downtown. Overall, the neighborhoods that are most impacted by high rates of overcrowding align with racially concentrated areas of poverty in the city.

Figure 1E-3.30: Overcrowding in Fresno, 2020



Source: Data downloaded from HCD AFFH Data and Mapping Tool in 2021.

Overpayment

This section provides an analysis of the proportion of households overpaying for housing. Current standards measure housing cost in relation to gross household income: households spending more than 30 percent of their income, including utilities, are generally considered to be overpaying or cost burdened. Severe overpayment occurs when households pay 50 percent or more of their gross income for housing. For owners housing costs include mortgage payment, taxes, insurance, and utilities.

Typically, the impact of high housing costs falls disproportionately on extremely low-, very low-, and low-income households, especially renter households. Lower-income households are defined as those that earn 80 percent or less of the area median household income (AMI). While some higher-income households may choose to spend a greater proportion of their income on housing, lower-income households may be limited by a lack of affordable housing.

In Fresno, 33,460 households (19.8 percent of all households) are cost burdened and 34,945 (20.7 percent of all households) are severely cost-burdened, for a total of 68,405 households (40.6 percent) (see **Table 1E-3.8**, Overview of Cost Burden in Fresno, 2019). As discussed in the Overpayment section of the Housing Needs Assessment, overpayment often impacts lower-income households at a higher rate due to financial constraints. Of the cost-burdened households in Fresno, approximately 48,615 (71.0 percent) are renters and 19,790 (28.9 percent) are homeowners.

Table 1E-3.8: Overview of Cost Burden in Fresno, 2019

	Number of Households (Owners + Renters)	Percent of Households
Cost Burden <=30%	97,620	57.9%
Cost Burden >30% to <=50%	33,460	19.8%
Cost Burden >50%	34,945	20.7%
Cost Burden not available	2,600	1.5%
Total	**168,625**	**100.0%**

Source: CHAS (Comprehensive Housing Affordability Strategy) data 2015-2019

Since 2010, overpayment rates have decreased. As seen in **Table 1E-3.9**, there was a 32.0 percent decrease in overpayment for moderate-income homeowner households and a 64.5 percent decrease for above-moderate income homeowner households. Overpayment rates also decreased amongst low-income households (incomes between 50 percent and 80 percent of the AMI) since 2010. This is largely due to the fluctuation in the number of low-income homeowners experiencing cost burden. As shown in the table, severe overpayment rates decreased for low-income homeowners by 48.1 percent and 28.8 percent for low-income renters, thus influencing the percent change for all low-income households.

On the other end of the income spectrum, extremely low-income households have experienced a disproportionate growth in overpayment regardless of tenure. Since 2010, overpayment rates have increased by 36.0 percent for extremely low-income households and severe overpayment rates have increased 26.9 percent.

Table 1E-3.9: Cost Burden in Fresno, 2010-2019

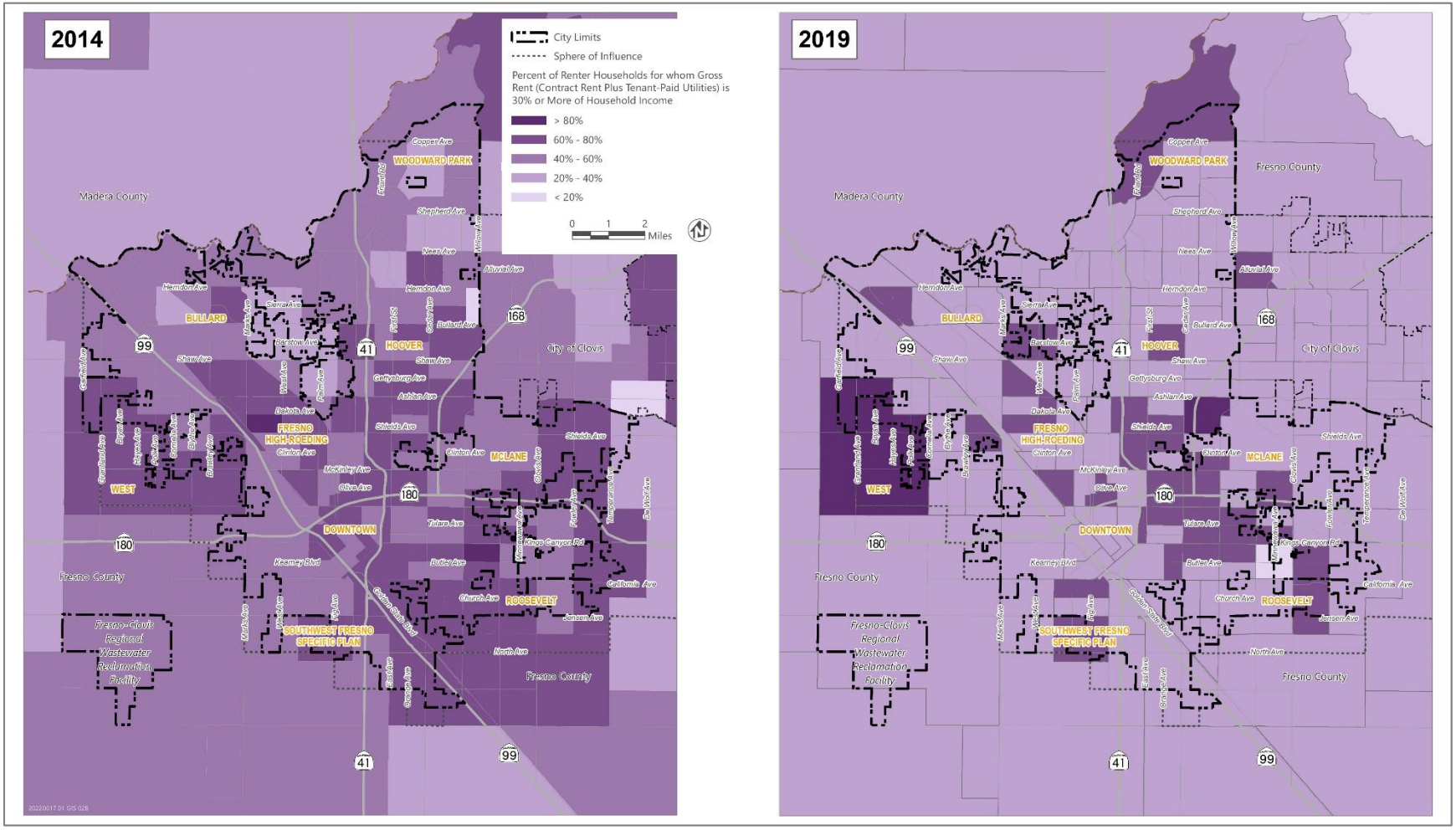
Household Type by Tenure and Income Level	Cost Burdened			Severely Cost Burdened		
	2010	2019	% Change (2010-2019)	2010	2019	% Change (2010-2019)
Total Households	156,225	168,625	-	156,225	168,625	-
All Households	70,700	68,410	-3.2%	36,110	34,945	-3.2%
Renters	42,320	48,615	14.9%	24,375	26,735	9.7%
Homeowners	28,380	19,790	-30.3%	11,735	8,210	-30.0%
Extremely Low-Income Households *(Income is less than or equal to 30% of AMI)*	19,530	26,555	36.0%	17,255	21,905	26.9%
Renters	16,965	22,285	31.4%	15,120	18,555	22.7%
Homeowners	2,560	4,270	66.8%	2,130	3,350	57.3%
Very Low-Income Households *(Income is between 30% and 50% of AMI)*	17,145	19,295	12.5%	10,310	9,050	-12.2%
Renters	12,310	14,845	20.6%	6,940	6,640	-4.3%
Homeowners	4,840	4,455	-8.0%	3,375	2,415	-28.4%
Low-Income Households *(Income is between 50% and 80% of AMI)*	14,985	13,965	-6.8%	4,945	2,920	-41.0%
Renters	8,995	8,650	-3.8%	1,840	1,310	-28.8%
Homeowners	5,995	5,310	-11.4%	3,105	1,610	-48.1%
Moderate-Income Households *(Income is between 80% and 100% of AMI)*	5,655	3,845	-32.0%	1,455	615	-57.7%
Renters	2,300	1,745	-24.1%	350	130	-62.9%
Homeowners	3,350	2,095	-37.5%	1,105	480	-56.6%
Above Moderate-Income Households *(Income is greater than 100% of AMI)*	13,385	4,750	-64.5%	2,145	455	-78.8%
Renters	1,750	1,090	-37.7%	125	100	-20.0%
Homeowners	11,635	3,660	-68.5%	2,020	355	-82.4%

Source: CHAS (Comprehensive Housing Affordability Strategy) data 2006-2010 and 2015-2019.

Figure 1E-3.31 and **Figure 1E-3.32** display the trends of overpayment for renters and homeowners in Fresno between 2014 and 2019. As described above, the rate of households experiencing overpayment significantly decreased during this time. As shown below, overpayment is most concentrated in census tract 54.08 around Fresno State University, census tract 25.02 along parts of Sequoia Kings Canyon Freeway that are immediate east of Downtown, and census tract 47.04 in northwest Fresno bordered by West Shields Avenue to the south, North West Avenue to the east and West Dakota Avenue to the north. Census tracts in south and west Fresno have the most elevated levels of overpayment with tracts having at least 40 to 60 percent of all households overpaying towards housing costs. These areas tend to align with racially concentrated areas of poverty where there is a greater presence of children in single female-headed households and low job market engagement. Downtown and the neighborhoods north and south of Shaw Avenue display lower rates of overpayment overall. In 2020, HUD released a comprehensive housing market analysis which summarizes housing market trends in Fresno between 2010 and 2020. [24] According to the report, after the Great Recession of 2008, home sales and prices began to stabilize again during 2010 and 2011. Home prices then increased every year between 2012 and 2018, although there were some fluctuations around 2014. The sales market began to balance out while rental market conditions began tightening. In the Fresno rental market, high levels of renter household growth and decreased rental construction contributed to a decline in vacancy rates and rising rents since 2015. Although rents rose, local economic conditions reportedly kept pace as the city experienced a net increase in jobs available. Between 2010 and 2018, the median gross rent increased by a total of 21 percent, while the median income of renter households increased by 29 percent. As shown in the figure below, overpayment amongst renters decreased throughout most of the city between 2014 and 2019. Overpayment amongst homeowners generally decreased in the existing neighborhoods north and south of Shaw Avenue during the same time period. Overpayment remained higher for both renters and homeowners closer to new growth areas and priority development areas such as neighborhoods along BRT corridors.

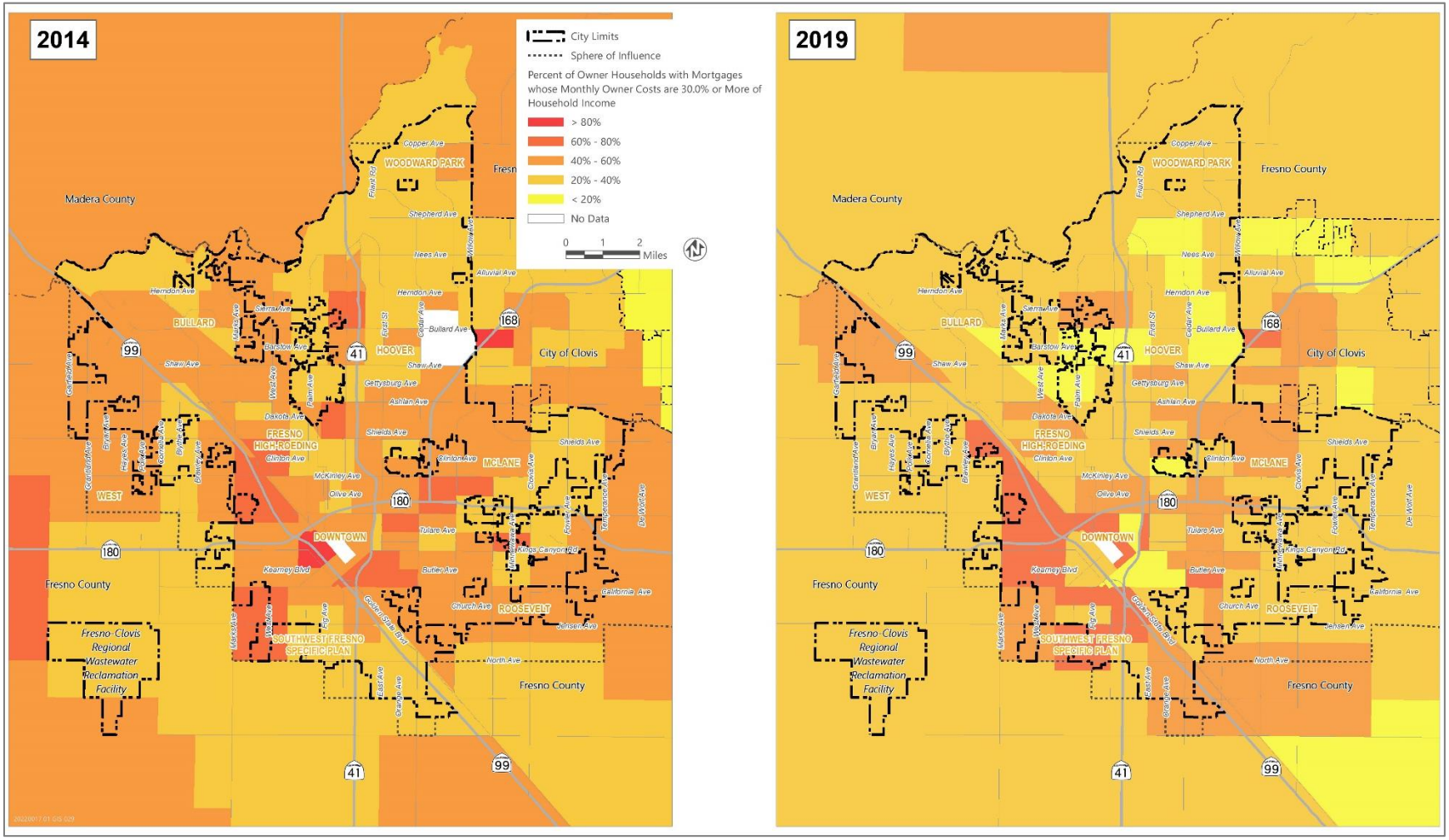
[24] U.S. Department of Housing and Urban Development, 2020. Comprehensive Housing Market Analysis: Fresno, California. Retrieved from: https://www.huduser.gov/portal/publications/pdf/FresnoCA-CHMA-20.pdf.

Figure 1E-3.31: Percent of Renters Overpaying, Fresno, 2014-2019



Source: Data download from the HCD AFFH Data Tool in 2021.

Figure 1E-3.32: Percent of Homeowners Overpaying, Fresno, 2014-2019



Source: Data download from the HCD AFFH Data Tool in 2021.

Substandard Housing Conditions

More than 65 percent of housing units in Fresno were built prior to 1990, making a majority of the housing stock over 30 years old, and approximately half of those are over 50 years old (Table 2-19, Age of Housing Stock (2020), in the Regional Housing Needs Assessment). Older units are generally more frequently subject to maintenance issues than newer housing stock. Even units that are not urgently in need of repair may benefit from energy-efficiency improvements to reduce energy usage and related climate impacts.

In Fresno, older homes are primarily concentrated the city's Downtown Neighborhoods historic core, including in Downtown, Chinatown, Southwest Fresno, Huntington, and Fulton-Lowell. Outside of the Downtown Neighborhoods, older homes also exist in historic communities that were annexed into the city, like Highway City and Pinedale. As the city grew outward, many commercial, office, and educational opportunities did as well, having the impact of reducing resources within these older, established neighborhoods. Homes in these neighborhoods are often in greater need of repair due to the limitation of available resources compounded with their age. Another measure of substandard housing conditions is the lack of presence of kitchen and plumbing facilities. The 2016–2020 ACS estimated that there are 1,804 renter-occupied units and 291 owner-occupied units in Fresno that lack a complete kitchen or plumbing. In total, these 2,095 units account for less than 2.0 percent of the total housing stock in Fresno. This indicates that renters are disproportionately burdened by substandard housing conditions and risk displacement if conditions deteriorate beyond the lack of a kitchen or plumbing, particularly beyond what is considered habitable.

Input received during the community engagement process for the City's 2020 Analysis of Impediments to Fair Housing Choice aligns with age trends to indicate the need for housing rehabilitation in Fresno. Residents and other stakeholders noted the need for single-family home repair and rehabilitation, rental rehabilitation, and improvements to aging mobile homes, particularly roof repair. This need was most identified in Southwest Fresno, although some participants noted homes in need of rehabilitation in other areas as well.

The Housing Element includes a program to provide targeted assistance to extremely low-income homeowners and targeting marketing in mobile home parks and similar areas. In addition, a program has been added to market the availability of additional rehabilitation assistance programs in areas of greatest need, such as the Southwest Fresno neighborhoods.

Homelessness

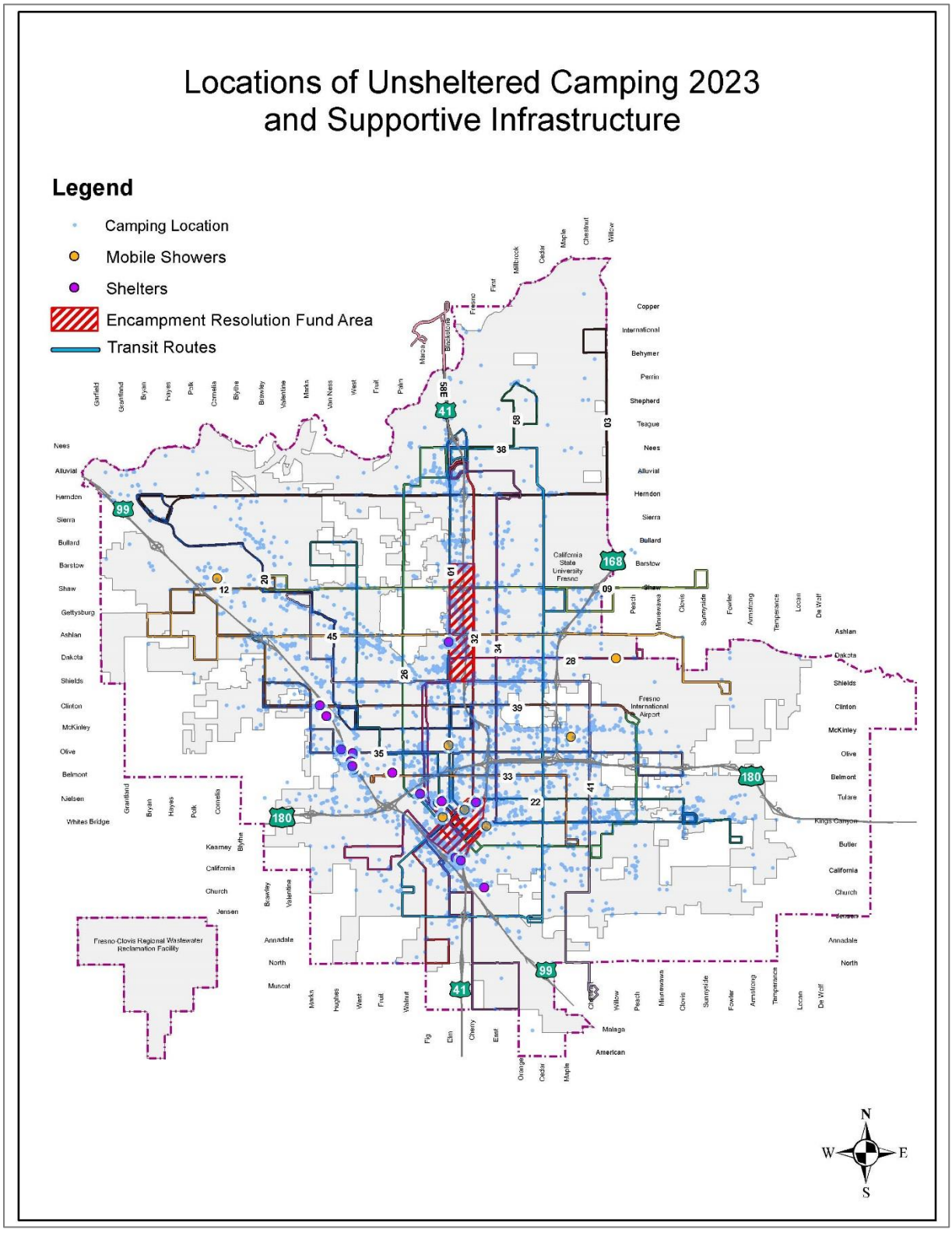
In January 2023, the Fresno-Madera Continuum of Care (FMCoC) conducted its annual Homeless Census and Survey Point-in-Time (PIT) Report, which estimated 3,207 individuals experiencing homelessness in the city of Fresno (71.4 percent) out of 4,493 persons experiencing homelessness throughout the entire Continuum of Care area (both Fresno and Madera Counties). Of that number, 1,388 persons were sheltered and 1,819 were unsheltered. Between 2022 and 2023, the total number of people experiencing homelessness in the city decreased by 5.6 percent, although the number of people unsheltered increased by 7.3 percent. Based on Fresno's quarterly tally, those experiencing unsheltered homelessness are living in all parts of the city, with a modest concentration in downtown Fresno and Southern Blackstone Corridor areas, where approximately 175 people are living. Generally, the unhoused population tends to be more concentrated in areas where they can more easily access services and public transportation. **Figure 1E-3.33** shows generally where unsheltered camping areas exist in the city, along with supportive infrastructure (i.e., mobile showers, shelters, and transit) that exists nearby and in the city. The main service providers for people experiencing homelessness in the city are in the central core of the city while north Fresno and the fringe neighborhoods have fewer services available.

The City utilizes the Fresno Madera Continuum of Care network as access sites (entry points) to homeless services. The access sites are part of the coordinated entry system for individuals that are experiencing homelessness or are at risk of homelessness. Access sites offer services ranging from shelter to diversion, depending on needs and availability of service. In addition to the 9 Fresno sites listed below, there are two mobile teams called Homeless Outreach Progressive Engagement (HOPE) teams which provide mobile services, connecting to locations known to be frequent camp locations or based on service requests.

Fresno-Madera Continuum of Care Access Sites:

- MAP Point at Poverello House
- Naomis House
- Poverello House Outreach Team
- The Welcome Center
- Fresno Home
- Golden State Triage Center
- Clinica Sierra Vista
- Marjaree Mason Center
- WestCare California Inc

Figure 1E-3.33: Locations of Unsheltered Camping (2023) and Supportive Infrastructure



Source: City of Fresno, 2024

Throughout the FMCoC area, which includes both Fresno and Madera Counties, approximately 63 percent of the homeless population identified as male, 36 percent as female, and 1 percent as transgender, questioning, or a gender that is not singularly male or female (e.g., non-binary, genderfluid, agender). Approximately half of the population identified as Hispanic (51 percent), with Hispanic individuals in Fresno being disproportionately represented among those experiencing homelessness. By race, 7 percent identified as Native American or Alaska Native, 3 percent as Asian, 16 percent as Black or African American, 1 percent as Native Hawaiian or Pacific Islander, 70 percent as White, and 3 percent as multi-racial or belonging to another race. Additionally, 235 people, or 6 percent of the homeless population, were veterans — veterans are overrepresented compared to the general population and nearly twice as likely to experience homelessness. About 19 percent were survivors of domestic violence (769 people), a group that is particularly vulnerable to homelessness due to the nature of domestic violence leaving individuals with few safe housing options. Approximately 33 percent of the homeless population reported a mental health problem, compared to 14 percent of the general population with a disability in the city of Fresno. Additionally, 36 percent reported a substance use disorder. In Fresno, individuals with mental health issues or substance abuse disorders are significantly more likely to experience homelessness due to difficulties maintaining employment, housing stability, and social support. Among the FMCoC homeless population, 389 persons (9 percent) were under 18 and 278 persons (6 percent) were 64 or older, with older adults facing a heightened risk of homelessness due to fixed incomes. Single adults and couples accounted for 86 percent of the population experiencing homelessness, while persons in family households (with children) accounted for 14 percent. The PIT report does not distinguish the characteristics of the homeless population in Fresno County or the city of Fresno separately from the COC, so it is assumed that these statistics generally represent the City of Fresno and Fresno County population.

Table 1E-3.10, Demographic Characteristics of Homeless Population, Fresno-Madera COC2023, identifies the proportion of each of protected characteristics identified in the 2023 Fresno-Madera COC dashboard report compared to the proportion of the population in Fresno and Madera counties, to identify whether any protected classes are disproportionately represented as part of the homeless population. Individuals that identify as White (including both White Hispanic and non-Hispanic) and Asian are the only demographic groups that are underrepresented in the homeless population compared to the total population living in Fresno and Madera counties. Residents identifying as Hispanic, Native American or Alaska Native, and Black or African American, are overrepresented in the homeless population.

Table 1E-3.10: Demographic Characteristics of the Homeless Population, Fresno-Madera COC, 2023

Characteristic	Homeless Population	Total Population (Fresno and Madera Counties)
Hispanic	51%	45%
Native American or Alaska Native	7%	3%
Asian	3%	10%
Black or African-American	16%	6%
Native Hawaiian or Pacific Islander	1%	0.3%
White[1]	70%	77%
Other/Multiple Races	3%	3%

[1]White is assumed to include both Hispanic and non-Hispanic.

Source: Fresno/Madera Continuum of Care Point-in-Time Executive Summary, 2023.

Homelessness is often a cross-jurisdictional issue; therefore, the City participates in and offers several homelessness resources and programs that are available regionally, identified in **Table 1E-3.11**.

Table 1E-3.11: City and County of Fresno Services to Address Homelessness

Service/Resource	Description	Operator	Location
Multi-Agency Access Program (MAP Point)	Traveling food truck and fixed locations that provide linkage to government resources and services (housing, behavioral health, physical health, food linkages, and transportation) at no cost to all residents of Fresno County	Fresno County Department of Behavioral Health (funding)/ Kings View Corporation (operation)	Countywide Physical locations: Firebaugh, Fowler, Fresno, Huron, Kerman, Mendota, Parlier, and Reedley
Fresno County Behavioral Health WARM Line	Available during weekday business hours for non-emergency emotional and coping support for residents throughout the county	Fresno County Department of Behavioral Health	Countywide
Multi-Agency Response to Community Homelessness (MARCH)	Countywide collaboration to address homelessness through coordination of resources regionally and cross-jurisdictionally, engagement of the community, attracting private funding to support community-specific programs, and inclusion of rural representatives selected by FCOG	FCOG/Jurisdictions	Countywide
Turning Point of Central California	Mental health services including a full-service partnership program	Contracted by Fresno County Department of Behavioral Health	Countywide
Fresno County Department of Social Services Homeless Assistance	Temporary housing, permanent housing, or arrears payments for families eligible for CalWorks once during a 12-month period	Fresno County Department of Social Services	Countywide

Service/Resource	Description	Operator	Location
Catholic Charities	Clothing, shelter, diapers, a food pantry, rent and mortgage assistance, DMV ID vouchers, application assistance for CalFresh and food stamps, application assistance for PG&E discounts, assistance with immigration services, and senior companionship assistance. Also has a Rural Outreach Program to serve residents throughout the region and work with migrant farmworkers.	Catholic Charities	Countywide Physical location: City of Fresno
Emergency Housing Voucher	Assist persons experiencing, at-risk of becoming, or recently homeless and those fleeing domestic violence, dating violence, sexual assault, stalking, or human trafficking	Fresno Housing and FMCoC	Countywide
United Way	Emergency informational services to connect persons in need with Homeless Prevention Programs, food and shelter assistance, help with landlord-tenant issues, legal services referrals, and more	United Way	Countywide
Groceries2Go	Provides grocery boxes of shelf-stable food items through an appointment-based system.	Central California Food Bank	Countywide
CalFresh Enrollment Assistance	Application assistance and assistance navigating the CalFresh process.	Central California Food Bank	Countywide
Fresh Produce Distribution	Mobile Pantry Program and Neighborhood Markets operating out of self-contained vehicles that travel to rural and remote areas throughout the county. A schedule of distribution locations is available online.	Central California Food Bank	Countywide
Senior Hunger Program	Food boxes to senior-serving partners tailored to the dietary needs of seniors.	Central California Food Bank	Countywide
Partner Feeding Sites	Provides food to over 220 sites including churches, community centers, and other organizations to feed hungry residents in local neighborhoods	Central California Food Bank	Countywide
USDA Partnership	Distribute food acquired by the USDA to 47 organizations in Fresno County.	Central California Food Bank	Countywide
Fresno County Food Map	Online service mapping locations of feeding sites, food banks, etc.	Fresno County	Countywide
Projects for Assistance in Transition from Homelessness (PATH)	Street outreach for people experiencing or at risk of homelessness and referrals to housing resources, medical care, mental health counseling, and social services.	Fresno County Department of Behavioral Health (funding)/ Kings View Corporation (operation)	Countywide
City of Fresno Mobile Shower and Restroom	Mobile trailers with bathing and restroom facilities for the unhoused. Facilities include showers, toilets and sinks, with ADA accessibility.	Contracted by City of Fresno	Various locations: City of Fresno

Service/Resource	Description	Operator	Location
Emergency Shelter services	Providing critical intervention for individuals and families experiencing homelessness with short-term shelter accommodations.	Elevate	Location: City of Fresno
Youth Emergency Shelter services	Providing access to immediate help and supportive resources for youth in crisis. Also assisting with overnight shelter for homeless youth ages 18-24.	Fresno Economic Opportunities Commission (EOC)	Location: City of Fresno
Fresno Home Bridge and Triage shelter	Providing temporary housing to homeless individuals that are located throughout the City of Fresno.	Mental Health System (TURN)	Countywide. Physical location: City of Fresno
Emergency Shelters Services	Providing short-term shelter accommodation at multiple sites throughout the City. Poverello provides 24-staffing, meals, case management to the unhoused community.	Poverello House	Citywide
Domestic Violence Services	Marjaree Mason Center provides county wide collaboration to provides services that focus on services for victims of Domestic Violence. MMC also provides safe houses for survivors to ensure the victims have a safe place to reside.	Marjaree Mason Center	Countywide. Physical location: City of Fresno
Fresno Rescue Mission	Providing 24-hour services for those in need. Services range from Case management, food services, counseling, employment and temporary housing	Fresno Rescue Mission	Physical Location: City of Fresno

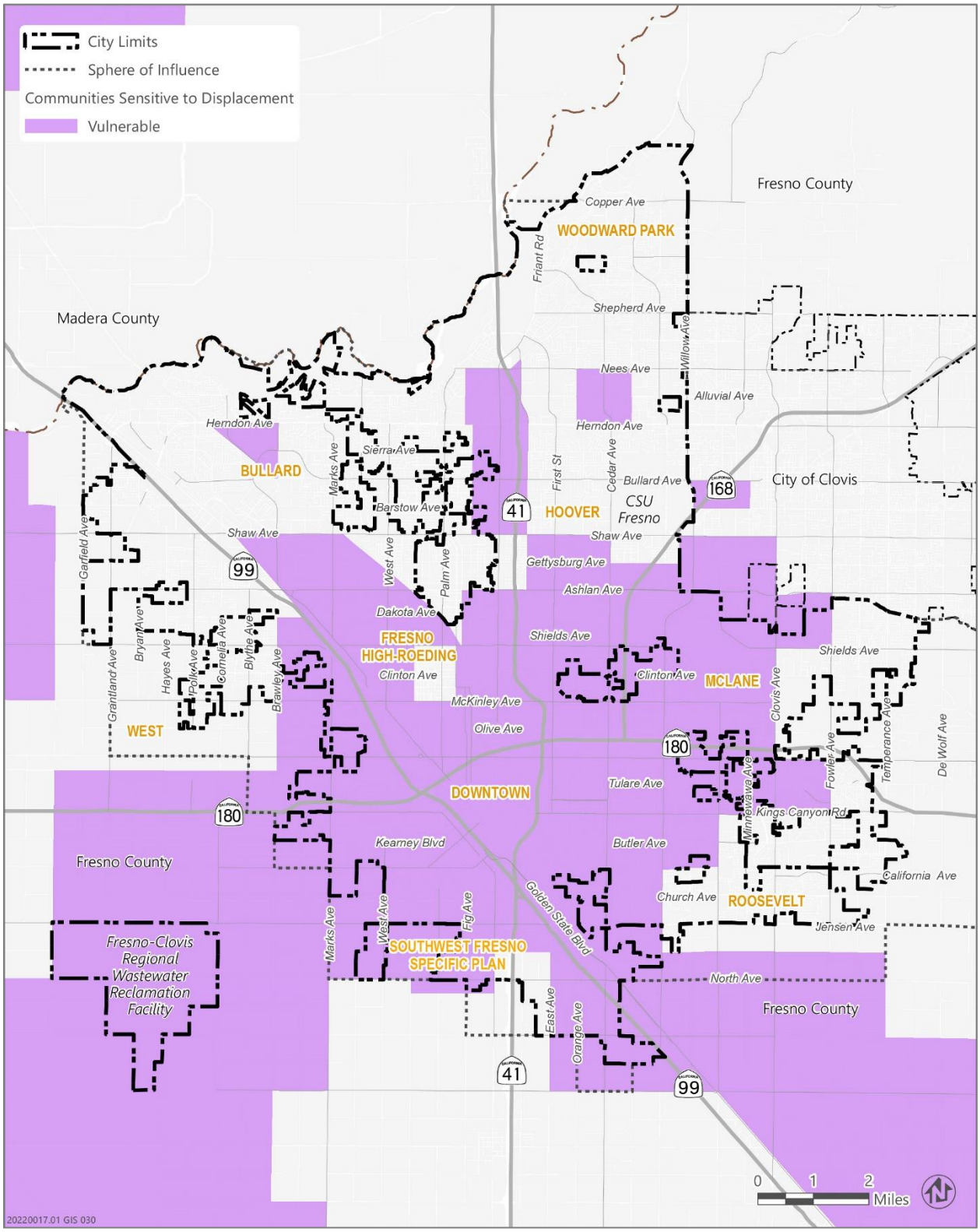
Source: City of Fresno, 2024

Emergency shelters also include Marjaree Mason Center, Fresno Rescue Mission, Evangel Home Inc., and Plaza Terrace. To address the needs of residents experiencing or at risk of homelessness, the Housing Element includes a program to connect vulnerable households with available resources and collaborate with County jurisdictions to increase the availability of homelessness resources.

Displacement Risk

The Urban Displacement Project, a joint research and action initiative of UC Berkeley and the University of Toronto, analyzes income patterns and housing availability to determine the level of displacement risk at the census tract level. **Figure 1E-3.34** shows the communities in Fresno that are sensitive to displacement as of 2017, according to the Urban Displacement Project. Sensitive communities include areas where a high proportion of residents may be vulnerable to displacement due to rising housing costs and market-based displacement pressures present in and/or near the community. In total, 27 percent of census tracts in the state of California are identified as areas that are sensitive to displacement.

Figure 1E-3.34: Communities Sensitive to Displacement, Fresno



Source: Data downloaded from the AFFH Data Viewer in 2021. Based on data from the Urban Displacement Project.

Displacement pressures are generally defined as a percent change in rent greater than the county median for rent increases or a difference between the tract median rent and median rents for surrounding tracts that are greater than the median for all tracts in the county. Communities were designated "sensitive" if they met the following criteria:

1) They currently have populations vulnerable to displacement in the event of increased redevelopment and drastic shifts in housing cost. Vulnerability is defined as:
    - Share of very low-income residents is above 20 percent in 2017; and,
    - The tract meets two of the following criteria:
        - Share of renters is above 40 percent in 2017
        - Share of people of color is above 50 percent in 2017
        - Share of very low-income households that are severely rent burdened households is above the county median in 2017
2) They, or areas in proximity, have been experiencing displacement pressures. Displacement pressure is defined as:
    - A percent change in rent above the county median for rent increased between 2012 and 2017; or
    - Local and nearby increases in rent were greater than the regional median between 2012-2017 OR the 2017 rent gap is greater than the regional median rent gap.

As shown in **Figure 1E-3.34**, a substantial amount of the land area in the city is sensitive to displacement pressure. Tracts identified as sensitive to displacement correspond with concentrated areas of poverty and neighborhoods which generally have lower median incomes, greater populations of color, and larger proportion of renter households. While the Urban Displacement Project does not specify the conditions that led to the vulnerability determination for Fresno, it can be assumed that residents of Fresno experience heightened displacement risk compared to residents elsewhere in the county due to a combination of lower incomes and high housing prices. Notably, the West and north Woodward Park area neighborhoods, which are experiencing higher percentages of cost burden from housing costs but have lower percentages of renter-occupied households than central core neighborhoods, were not found to be sensitive to displacement (see **Figure 1E-3.34**).

Using 2015 to 2019 data, Urban Displacement Project released an Estimated Displacement Risk (EDR) model for California that identifies varying levels of displacement risk for low-income renter households in all census tracts in the state. The model includes three separate displacement layers: the "Overall Displacement" layer, the "50-80% AMI" layer which shows the level of displacement risk for low-income households specifically, and the "0-50% AMI" layer which shows the level of displacement risk for extremely low-income and very low-income households combined. [25] These are shown for the City of Fresno below in **Figures 1E-3.35 through 1E-3.37**.

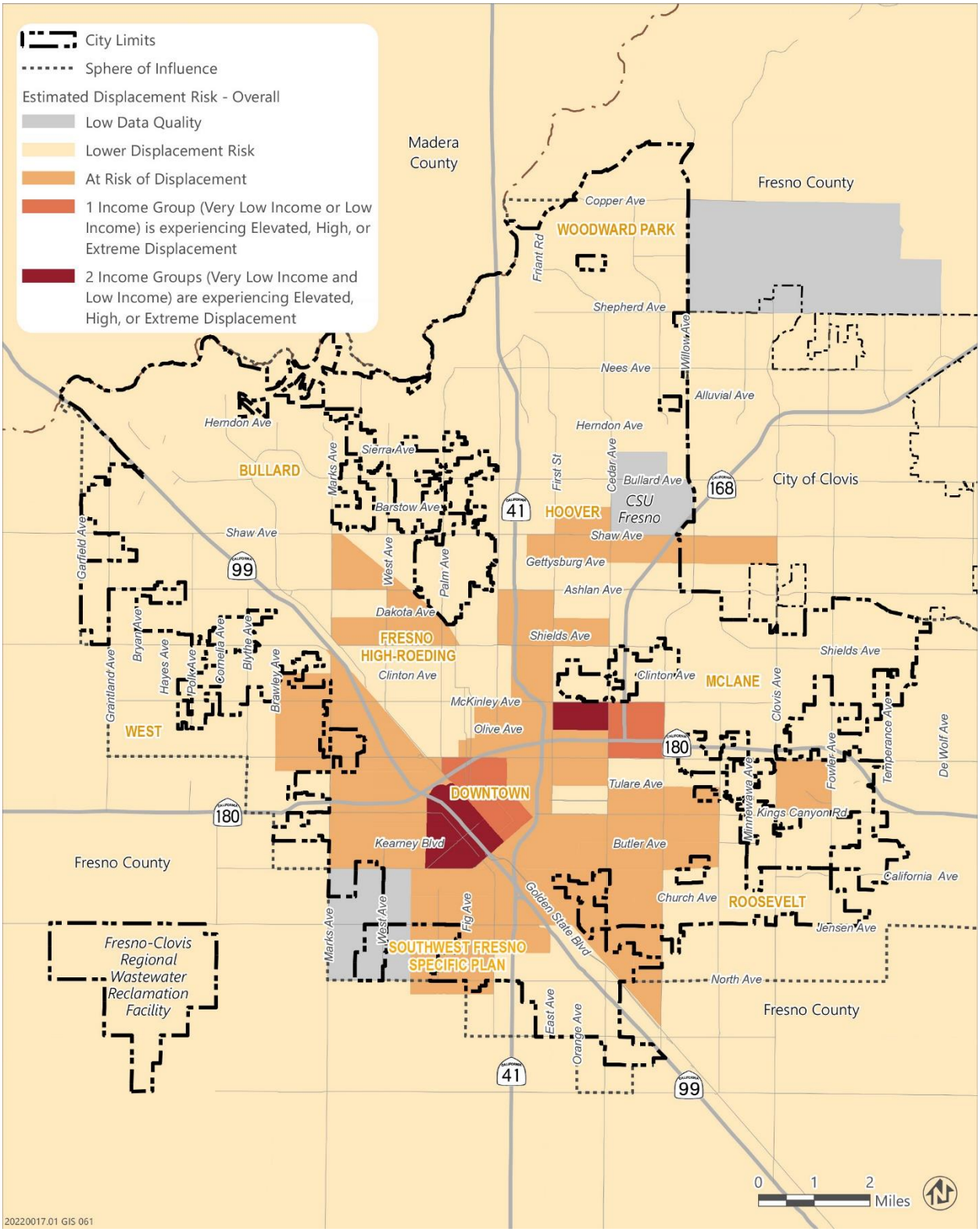
Tracts are assigned to one of the following categories, with darker red colors representing higher displacement risk and lighter orange colors representing less risk:

- **Low Data Quality:** the tract has less than 500 total households and/or the census margins of error were greater than 15 percent of the estimate (shaded gray).
- **Lower Displacement Risk:** the model estimates that the loss of low-income households is less than the gain in low-income households. However, some of these areas may have small pockets of displacement within their boundaries.
- **At Risk of Displacement:** the model estimates there is potential displacement or risk of displacement of the given population in these tracts.
- **Elevated Displacement:** the model estimates there is a small amount of displacement (e.g., 10 percent) of the given population.
- **High Displacement:** the model estimates there is a relatively high amount of displacement (e.g., 20 percent) of the given population.
- **Extreme Displacement:** the model estimates there is an extreme level of displacement (e.g., greater than 20 percent) of the given population.

In Fresno, very low-income and low-income households are experiencing elevated, high, or extreme displacement risk in downtown and in central core neighborhoods (displayed in the dark red tracts). Looking more closely at displacement risk by income group in **Figure 1E-3.36** and **Figure 1E-3.37**, very low- and extremely low-income households (0-50 percent of AMI) are experiencing extreme levels of displacement risk California's recent history has shown that environmental disasters such as wildfires, earthquakes, and floods can also be significant causes of displacement, and that climate change is accelerating the risk from such disaster events.

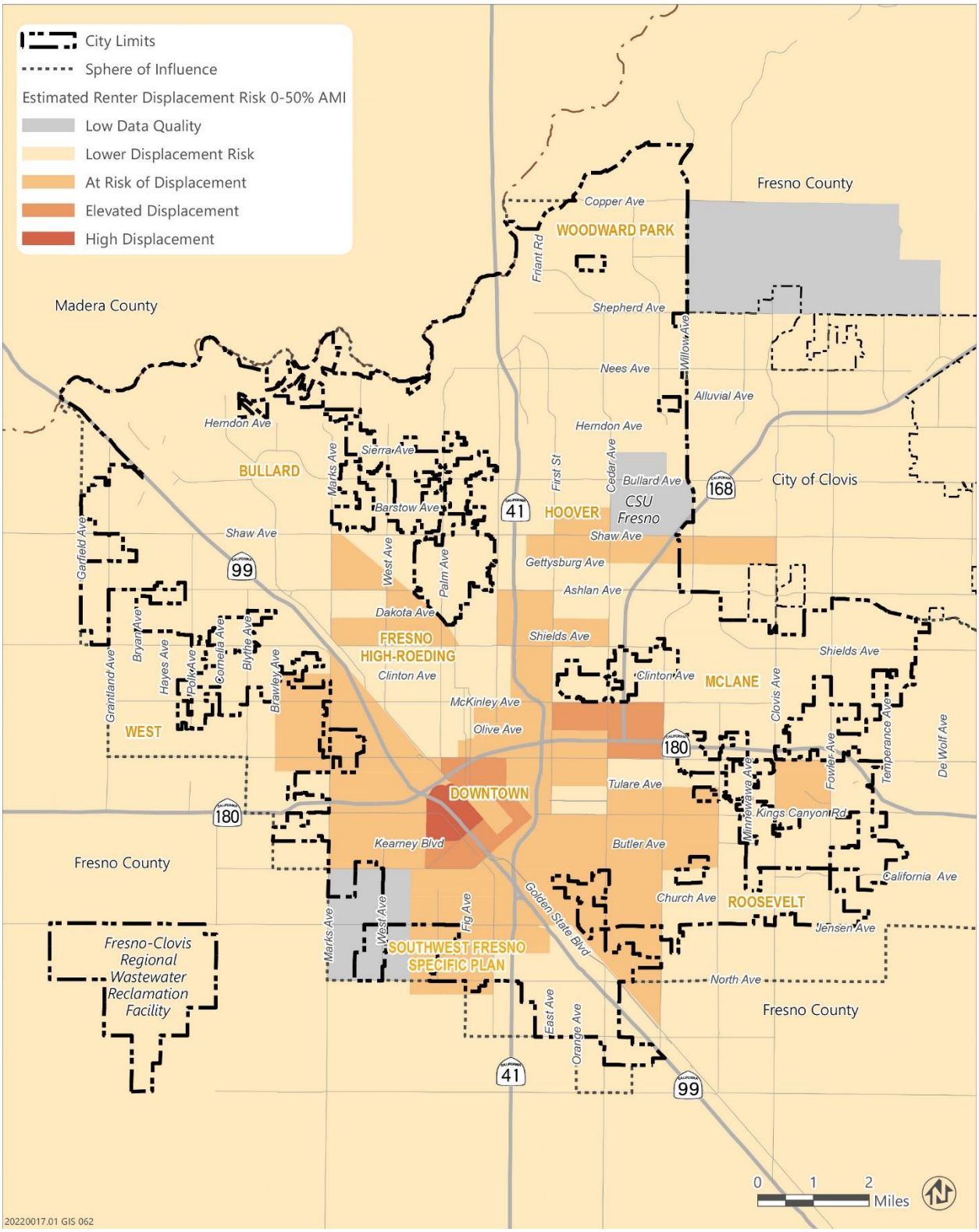
[25] Urban Displacement Project modeled displacement risk as the net migration rate of renter households at varying income levels. Tracts that have a predicted net loss within these groups are considered to experience displacement.

Figure 1E-3.35: Estimated Displacement Risk - 2019



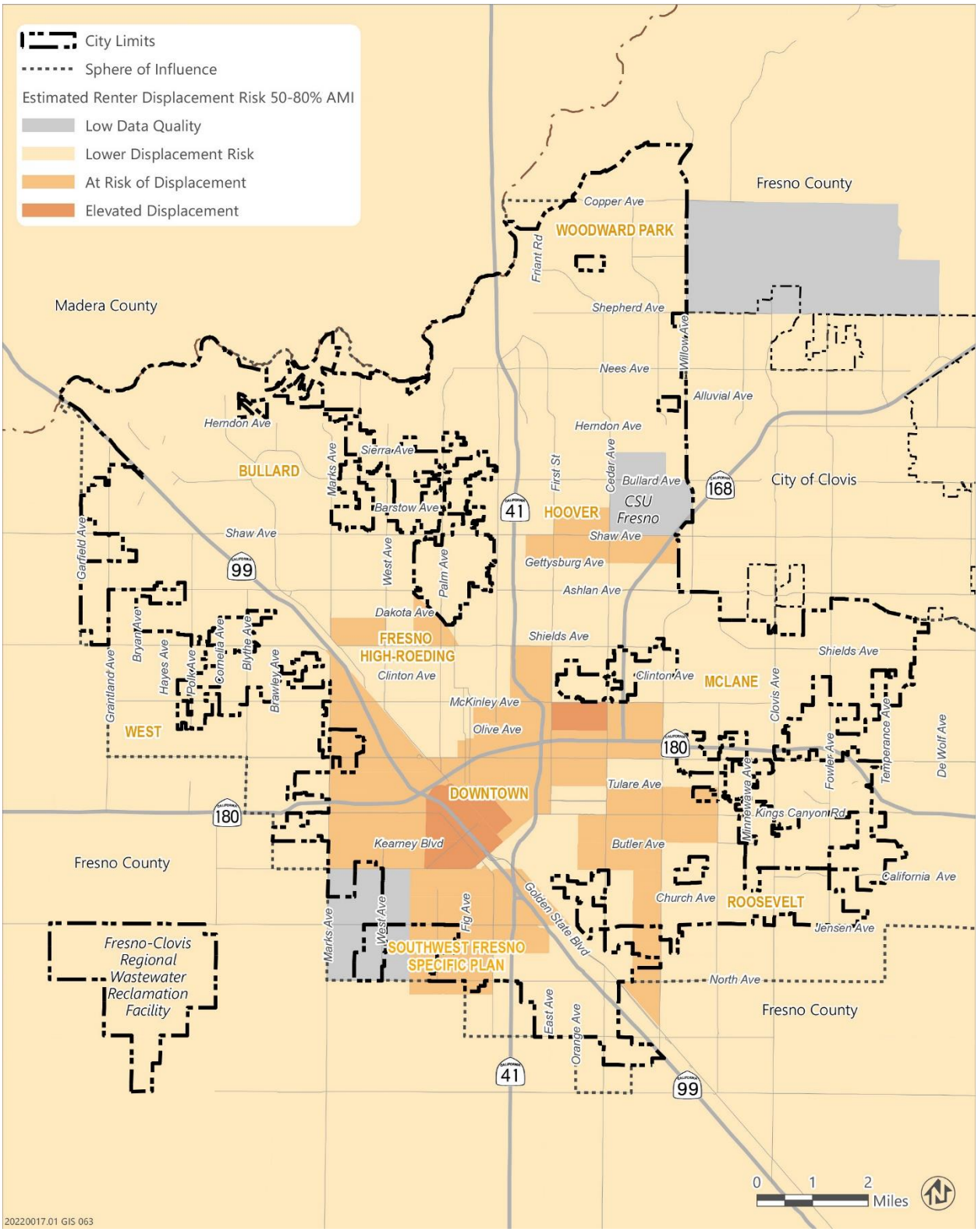
Source: Data downloaded from the AFFH Data Viewer in 2023. Based on data from the Urban Displacement Project and 2014-2019 5-year American Community Survey data.

Figure 1E-3.36: Estimated Displacement Risk - 0% - 50% AMI (2019)



Source: Data downloaded from the AFFH Data Viewer in 2023. Based on data from the Urban Displacement Project and 2014-2019 5-year American Community Survey data.

Figure 1E-3.37: Estimated Displacement Risk - 50% - 80% AMI (2019)



Source: Data downloaded from the AFFH Data Viewer in 2023. Based on data from the Urban Displacement Project and 2014-2019 5-year American Community Survey data.

Displacement Avoidance Efforts

The Fresno Transformative Climate Communities Collaborative (Collaborative) began with a participatory process to identify a series of projects to invest in that will result in significant environmental and economic benefits in Downtown, Chinatown, and Southwest Fresno. Anyone who lived, worked, or owned property in these areas was encouraged to participate. The purpose of the Collaborative was to promote and nurture creative project ideas, develop local criteria to define the type of catalytic and connective impact projects should have, and provide the City of Fresno with direction on the proposal of integrated projects included in the application to the Strategic Growth Council (SGC) for funding.

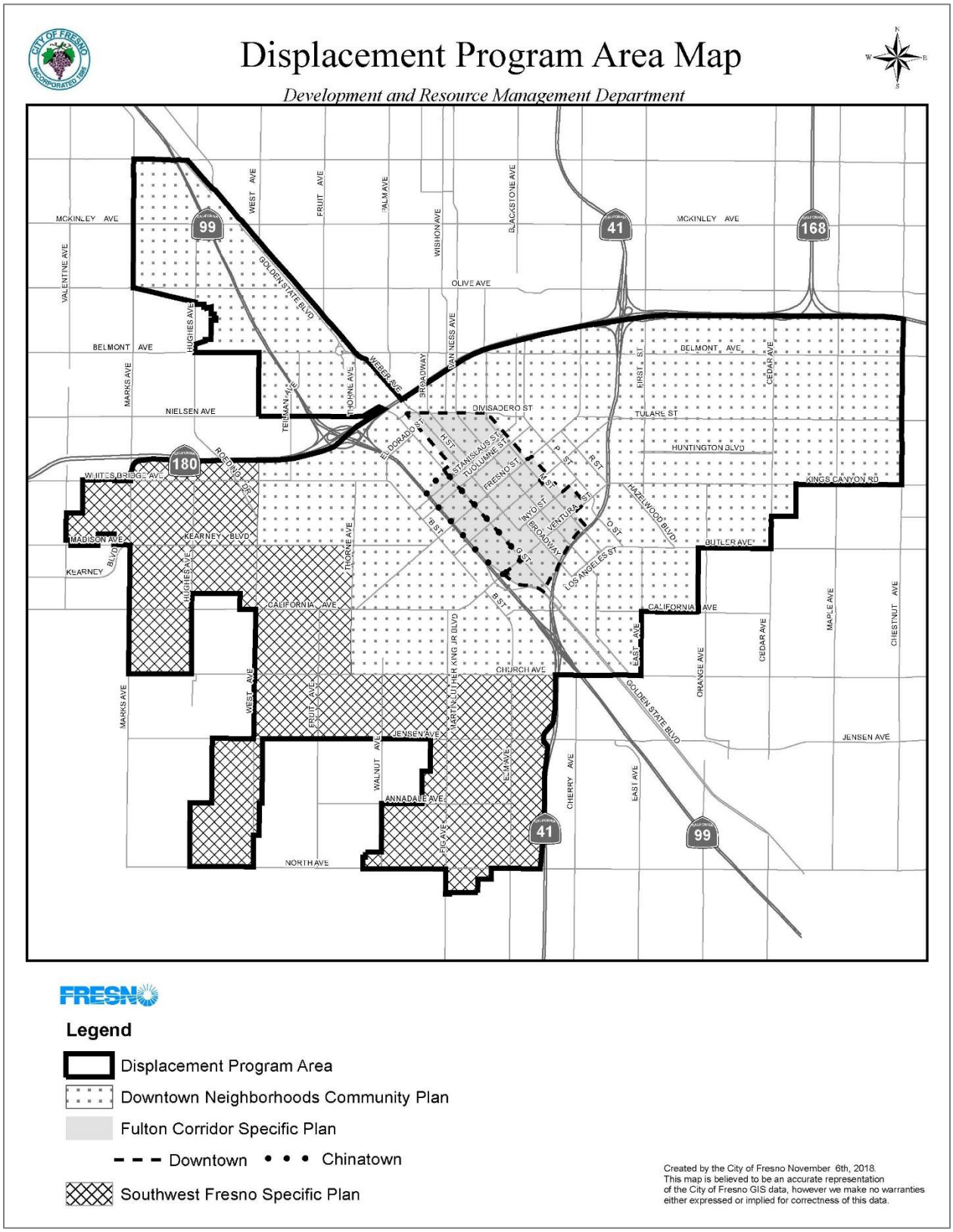
The Collaborative met regularly in 2017 and resulted in an active, engaged, 164 member Community Steering Committee. During these meetings, participants were encouraged to propose projects, and eligible projects were then gathered into five packages that were presented for a community vote. At the final Community Steering Committee public meeting, voting members approved a project package designed by residents of Southwest Fresno and developed and submitted a proposal to SGC for $66.5 million from the Transformative Climate Communities Program (TCC).

These engagement efforts resulted in Transform Fresno, a community-driven initiative to transform the 4.9 square mile project area— comprised of Chinatown, Downtown and Southwest Fresno —through a suite of projects and plans that will reduce greenhouse gas (GHG) emissions while also providing local environmental, health, and economic and social equity benefits (see **Figure 1E-3.38**, Transform Fresno Project Area). In early 2018, SGC awarded Transform Fresno a TCC grant of $66.5 million to implement the projects identified through community-driven planning processes.

Transform Fresno is anticipated to bring a number of benefits to residents of the city; however, there are reasons to be concerned about the negative effect that increased investment and development might have on vulnerable populations as displacement can occur whether a neighborhood is experiencing disinvestment or reinvestment. Disinvestment-related displacement describes when the value of a property does not justify investing in its maintenance, leading to decay and abandonment. Reinvestment-related displacement refers to the process in which investments in a neighborhood result in increased rent to a point where it is profitable for landowners to sell or raise the rent and existing tenants are forced to leave.

The City of Fresno has taken actions to prevent displacement of residents and businesses in and around the Transform Fresno project area. Notably, TCC funded projects will not cause direct displacement, as all proposed housing units will be constructed on vacant lots and transportation activities will occur within the public right-of-way. However, indirect displacement from rising property values - as a result of large-scale investment in historically underserved TCC neighborhoods - remains a concern for residents and business owners. To address these concerns in a meaningful way, the City of Fresno established an Anti-Displacement Task Force (ADTF) in November of 2018.

Figure 1E-3.38: Transform Fresno Displacement Program Area



Source: City of Fresno

The TCC Program also requires policies and programs to avoid the displacement of existing residents and local businesses, to help ensure all members of the community benefit from the investment. The City of Fresno adopted a Displacement Avoidance Plan (DAP) in 2019 in efforts to reduce economic displacement risk within the Transform Fresno project area. The DAP outlines policies intended to understand the impact of TCC investments on existing households and businesses, while opening discussions about preventative measures and proactive solutions to displacement. To support this effort, Thrivance Group – a contracted local consultant selected to implement the DAP –gathered and analyzed data related to displacement vulnerability within the Transform Fresno project area, conducted educational and informational community workshops, and made 48 displacement avoidance policy recommendations in the 2021 "Here to Stay: A Policy-Based Blueprint for Displacement Avoidance in Fresno." The City incorporated several recommendations from "Here to Stay" into the One Fresno Housing Strategy, which was the basis for several new implementation programs in this Housing Element.

Farmworkers

Farmworkers are traditionally defined as persons whose primary incomes are earned through seasonal or permanent agricultural labor. There are generally three types of farmworkers in the state:

- Permanent Residents: Permanent residents of the county in which they work who may require housing that accommodates families, including housing affordable to extremely low-income households for seasonal workers who do not work in the off-season.
- Migrant Farmworkers: Temporary residents who perform agricultural labor on a seasonal or temporary basis and typically need housing for individuals, such as single occupancy rooms, bunkhouses, or dormitory style living.
- H-2A Visa Workers: Temporary residents who enter the U.S. under a federal guest worker program for a limited term and require a sponsor employer who provides housing, meals, and transportation to the job site.

Farmworkers are essential to Fresno County's and the city's economies as well as to local and national food supplies. Across the state, housing for farmworkers has been recognized as an important and unique concern. Farmworkers are generally considered a special housing needs group due to their limited income and often-unstable nature of their employment. According to one of the more recent studies (2022) that touches on the housing needs of farmworkers, "Farmworker Health in California, Health in a Time of Contagion, Drought, and Climate Change," published by the Community and Labor Center at UC Merced, over half of the state's farmworker population lives in the San Joaquin Valley (61 percent). The study was based on interviews with a sampling of over 1,200 California farmworkers from five agricultural regions, including the San Joaquin Valley. Some key findings related to farmworker housing needs from the study included:

- Only three percent of farmworkers primarily speak English at home, which indicates that language barriers could pose a challenge to securing housing.
- 92 percent of farmworkers rent their housing, indicating that there are barriers to accessing homeownership and that there may be a higher risk of displacement amongst farmworkers.
- Farmworkers face a range of housing problems, indicating a need for assistance with repairs to housing or assistance with finding more suitable housing. The housing problems included lack of access to water inside the home (10 percent), bad tasting water at home (24 percent very bad; 13 percent bad), challenges in keeping the home cool (39 percent) or warm (36 percent), and other poor housing conditions such as rotting wood (16 percent), mold (14 percent), water damage (13 percent), water leaks (12 percent), cockroaches (24 percent), or rodents (17 percent).
- Survey respondents, "lived in large, overcrowded households with low incomes and several household problems." Approximately 70 percent of the sample lived with children under the age of 18. The median household size was four, and one-fourth of farmworkers lived in households with six or more persons, indicating a need for larger family-sized housing units, while more than one-fourth reported sleeping in a room with three or more persons, indicating overcrowding.
- Along with large household sizes, the farmworkers reported a median annual household income of $25,000. Although the study acknowledged that this figure may have under-reported the income of the entire household, it likely still underscores the fact that housing affordability would be an acute need for a very large portion of farmworker households who would struggle to afford larger-sized homes on the relatively low wages associated with farm work.
- The accompanying data dashboard[26] indicates that of the 512 responses received from farmworkers in the San Joaquin Valley region, 70.1 percent of respondents occupy a single-family home; 16.8 percent live in an apartment; 4.1 percent live in a labor camp/boarding house/ or motel; 8.6 percent are sleeping in a car, RV, or garage; and about 0.4 percent of respondents are renting a room or did not specify their living arrangement.

Data collected as part of the USDA Census of Agriculture indicates that the composition of farmworker households has changed since 1996 to include more families and fewer individuals. As a result, farmworker housing needs have likely shifted from primarily seasonal housing for migrant workers (such as dormitory-style housing available during peak labor activity in May through October) towards more permanent affordable housing for low wage working families, although there remains a need for both housing types.

[26] UC Merced, 2022. Farmworker Health Study Data Dashboard. https://clc.ucmerced.edu/farmworker-health-study/farmworker-health-study-data-dashboard. Accessed March 2024.

As shown in **Table 1E-3.12**, the 2017 USDA Agricultural Census reported 2,540 farms and an estimated 37,819 farmworkers in Fresno County. Most farmworkers were seasonal (55.4 percent), working less than 150 days per year. Estimates from the 2020 ACS report that there were 36,163 people in Fresno County (8.8 percent of the overall workforce) employed in the Agriculture, Forestry, Fishing and Hunting, and Mining industries. In the city of Fresno, there were 9,414 people employed in this category (4.3 percent of the overall workforce). However, ACS data does not accurately capture the farmworker population as it includes employment in various non-agricultural industries and excludes farm labor contractors, which significantly underestimates the number of farmworkers. Moreover, the seasonal and often migrant nature of farm labor, and accounting for undocumented workers, suggest that this data likely underrepresents the actual farmworker population, because undocumented residents do not often participate in traditional data collection. As such, there is little data available on farmworkers in the city.

Table 1E-3.12: Hired Farm Labor (Countywide), 2017

Labor Term	Number of Farm Operations	Number of Workers
Year-Round Labor (150 days or more)	1,557	16,876
Seasonal Labor (Less than 150 days)	1,753	20,943

Source: USDA Agricultural Census, Table 7, 2017.

Although census data indicates that there is a small population of farmworkers in the city relative to other jurisdictions in Fresno County, school enrollment data suggests that some of region's farmworker population utilize services within Fresno. While these estimates are at the school district level (students can live in one city and attend a school located in a different city), the data shows there were approximately 5,902 migrant students enrolled in school districts throughout Fresno County with 2,975 migrant students enrolled in schools in the city of Fresno and 43 enrolled in Clovis Unified during the 2020-2021 school year, as shown in **Table 1E-3.13**. Generally, migrant student enrollment has increased steadily throughout the county. Nearly half of the county's migrant student population attend school in the city of Fresno. The greatest enrollment of migrant students is in Orange Center Elementary, located in the unincorporated county outside the southwestern fringe of the city.

Table 1E-3.13: Migrant Student Enrollment

School District	2016-2017	2017-2018	2018-2019	2019-2020	2020-2021
Clovis					
Clovis Unified	51	51	49	44	43
City of Fresno					
American Union	-	-	-	-	-
Fresno County Office of Ed	32	22	39	32	33
Fresno Unified	725	867	850	713	918
Monroe Elementary	41	43	33	25	22
Orange Center Elementary	1,139	1,289	1,392	1,481	1,607
Pacific Union Elementary	-	-	-	-	-
Washington Colony Elementary	-	-	-	-	-
Washington Unified	155	175	189	203	218
Washington Union High	-	-	-	-	-
West Fresno Elementary	-	-	-	-	-
West Park Elementary	14	19	17	15	13
Central Unified	208	179	172	153	164
Total City of Fresno	**2,314**	**2,594**	**2,692**	**2,622**	**2,975**
Total Fresno County	**4,780**	**5,061**	**5,185**	**5,445**	**5,902**

Source: California Department of Education, California Longitudinal Pupil Achievement Data System (CALPADS), Cumulative Enrollment Data (Academic Years 2016-2017, 2017-2018, 2018-2019, 2019-2020, 2020-2021)

Farmworkers face unique challenges securing affordable housing due to a combination of limited English language skills, very low household incomes, and difficulty qualifying for rental units or home purchase loans. Based on farmworker employment figures collected by the California Employment Development Department (EDD) in 2022, the median wage for farmworkers statewide was $14.72 per hour or $30,625 annually. Farmworkers in the Fresno region had a slightly lower median wage of $14.52 per hour or $30,202 annually, which is considered a very low-income based on HCD's household income limits for Fresno County. Seasonal farmworkers (employed in farm labor less than 150 days per year) who do not find supplemental income during the off-season are often considered extremely low income. Many farmworkers pay market-rate prices for housing, despite having incomes qualifying for housing assistance, due to a shortage of employer-provided housing and difficulty securing publicly-assisted housing.

Fresno Housing manages 194 units of seasonal farmworker housing for migrant farmworkers, none of which are within the city of Fresno. According to HCD's Employee Housing Facilities database, there are 23 permanent employee housing facilities in the city of Fresno which can house 478 employees. Of these, 12 facilities are reserved for workers with H-2A visa which often are bunkhouses, dorms, or motel rooms which could accommodate 185 workers. These units are privately funded and provided by employers as a requirement of the H-2A visa program.

Between September 2021 and January 2022, Fresno County conducted a Farmworker Survey and a Farmworker Employer Survey. A second round of each survey was conducted between February 2022 and July 2022. In total, County staff surveyed a total of 240 farmworkers and 170 farm employers. Twenty-five farm employers currently have some type of farm labor housing on site (not necessarily in use); five of those employers would consider retaining the farm labor housing. Staff surveyed 145 farm employers who do not have any farm labor housing on site; 28 of those surveyed would consider adding labor housing as single houses or cottages; one farm employer specified labor housing as apartments. Farmworkers expressed a preference for detached single-family housing and a very small percentage (0.02 percent) expressed farmworker housing as desirable future housing.

In summary, the surveys indicate that traditional farm labor/worker camp housing is not desired by the Fresno County farmworkers/laborers, and even though there was a small number of Fresno County farm employers that might be interested in providing housing, it would only be if the housing was subsidized. Similar to other special needs groups, much of the housing need for farmworkers, especially farmworker households with families, is best met near services, schools, and other resources and amenities.

The following is a list of organizations that provide resources and support to Central Valley farmworkers that can be accessed by Fresno residents:

- **Binational Central California:** Provides services related to immigration, health care, and educational resources.
- **California Farmworker Foundation:** Provides services related to education, workforce development, health care, immigration, and community wellness.
- **California Rural Legal Assistance:** Provides legal counseling and representation in matters of housing advocacy, immigration law, removal defense, impact litigation, labor and employment, pesticide and work safety, sexual harassment prevention.
- **Central California Legal Services:** Provides legal counseling and support.
- **Centro La Familia:** Offers domestic violence assistance, sexual assault and human trafficking services, consumer and family advocacy, CalFresh outreach and education, telecommunications education and assistance in multiple languages, and immigration support services.
- **Cultiva la Salud:** Provides services to build leadership capacity and improve access to healthy food, beverages, and physical activity opportunities.
- **Fair Housing Council of Central California:** Provides fair housing advocacy and tenant support.
- **Green Raiteros:** Provides transportation assistance, workforce development, and small business support.
- **Rural Mobile Health:** Offers medical services and screenings at no cost.
- **Self-Help Enterprises:** Provides financial assistance, rental housing, housing rehabilitation, community development, and other support services to address housing and community development needs in rural and disadvantaged communities.

- **United Farm Workers Foundation:** Provides assistance related to immigration status filings, including Deferred Action for Childhood Arrivals, family-based petitions, naturalization/citizenship, representation before the Board of Immigration Appeals, legislative advocacy, and referrals to other support services.

In addition, the Housing Element includes **Program 24** to address the housing needs of farmworkers. Through **Program 24**, the City will identify development opportunities for farmworker housing and meet with farmworker housing developers and advocates on a biannual basis to discuss their needs and offer assistance in the form of letters of recommendation for grant applications and discuss incentives for constructing farmworker housing. The City will also offer incentives such as density bonuses, streamlined processing, and the minor deviation process to facilitate development of farmworker housing.

Other Relevant Factors and Local Knowledge

In addition to the indicators analyzed above, there are several other factors that can influence housing mobility and access to opportunity in a jurisdiction. Historic development patterns in Fresno have resulted in neighborhoods that are largely or exclusively made up of single-family homes and historic discrimination has influenced the city's racial and ethnic composition. Further, given current market trends, newer market rate neighborhoods may not be financially accessible to low-, moderate-, and some above-moderate income households without overpayment or overcrowding. Other factors may include the distribution of public and private investments, local regulatory or economic development plans, and historic policies. Those factors that are considered relevant vary between jurisdictions and are described at the local level below.

Local History of Fresno

The San Joaquin Valley is the traditional homeland of the Yokuts people, who lived in the foothills, and Mono peoples, who occupied the upper reaches of Fresno County's rivers.[27] Missionaries and trappers were the first non-native people to roam the area, beginning in the late 1770s. Miners soon followed during the "Gold Rush" period.[28]

By 1869, railroad investors were constructing a railroad through the valley and speculating on sites for new town development. Fresno was founded by the Central Pacific Railroad Company in 1872, and Leland J. Stanford, a Director for the Railroad, is credited with selecting the site of the city.[29] The new site was formally named Fresno Station in 1874, and was later incorporated into the City of Fresno in 1885.[30] By the 1900s, the city of Fresno was the county's metropolis, "a true Victorian city" with its horse-car lines, dirt streets, and wood sidewalks.[31]

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[27] Fresno County Historical Society. The People and Communities of the 19th Century Central Valley - Native Americans. Accessed via: https://www.valleyhistory.org/native-americans

[28] UCLA Luskin Center for Innovation, 2023. 2023 Progress Report on Implementation of the Transformative Climate Communities Program Grant, "*A Brief History of Fresno: The Legacy of Environmental Injustice*" Accessed via: https://innovation.luskin.ucla.edu/wp-content/uploads/2023/06/Transform-Fresno-2023-Progress-Report.pdf

[29] City of Fresno, n.d. Historic Preservation. Accessed via: https://www.fresno.gov/planning/historic-preservation/

[30] Calvarese, M., Osborne, B., Moulton, J. (2016). Downtown Land-Use Change: A Historical Geography of Fresno, California's Central Business District, 1860–2010. The California Geographer, Volume 55, p 19-38. Accessed via: https://scholarworks.csun.edu/handle/10211.3/170952?show=full

[31] Fresno County Historical Society, Past and Present Journal Volume 42 No. 4. Accessed via: https://www.valleyhistory.org/history-of-fresno-county

After Fresno was established, it saw a boom in agriculture that demanded an expanded labor force.[32] Throughout the 1850s and 1860s, Asian settlers were recruited as a major source of labor for the mining and railroad industries in the western U.S. Because of the railroad and its geographical location, the new city quickly attracted hundreds of settlers and became the county seat.

In the early 1880s, the U.S. Congress passed the Chinese Exclusion Act of 1882, which restricted Chinese immigration to the U.S. Other exclusionary laws aimed at Chinese immigrants were passed by Congress between 1888 and 1902, effectively reducing the number of Chinese people entering the U.S. Although Chinese immigrants helped build the Central Pacific Railroad, they were viewed as outsiders by local White residents and were forced to settle west of the tracks in what is now Chinatown. Nearly all Valley cities including Lodi, Stockton, Modesto, Turlock, Merced, Madera, Fresno, Visalia, Tulare, and Delano developed strict land use policies to segregate and contain migrant immigrants, including Chinese settlers, to one "undesirable" side of town. In Fresno (home to California's second largest Chinatown), White residents convinced major landowners not to allow Chinese residents to own property east of the railroad tracks and local police criminalized any Non-Whites found on the east side of town.[33] As the city grew, Black or African American people and many immigrant groups – including Germans and Armenians – were relegated to the Southwest and Downtown. Today, Germantown and Armeniantown along with Chinatown are cherished as some of Fresno's early ethnic neighborhoods.

In 1918, Fresno's first City plan was created by Charles Henry Cheney, Architect and City Planner. It sought to establish a land use plan that limited industrial encroachment into residential areas and vice versa. At that time, the industrial area of the city was established in the south, strategically located to utilize the railroads and take advantage of the prevailing winds, which were from the northwest. Residential neighborhoods were shown equally distributed to the west, north, and east upwind of the industrial area. Building on development patterns that were already existing at the time, the plan designated areas for single family dwellings, flats, group housing and apartments, churches, schools and parks, businesses, and various types of industrial development. The development patterns in the plan are still reflected in the Downtown and surrounding neighborhoods as they stand today.

The population continued to grow in the San Joaquin Valley where most jurisdictions, including Fresno, built tract housing and new subdivisions in formerly agricultural areas. As more and more people came to the city, migration from central neighborhoods began to occur. Development away from the urban core, in combination with newly constructed freeways, Clovis Unified School District's high performing schools, available riverfront property, and a healthcare sector along Herndon Avenue, attracted White and residents of other races and ethnicities to the affluent neighborhoods of north Fresno. These new, often larger homes, attracted a variety of middle- and upper-class residents away from the urban core of the city. As these suburbs grew, resources were not distributed evenly due to the financial burden to provide schools, transit, and infrastructure.

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[32]Pacheco-Werner, T. L., Corona, K., Corona, G., Chan, S., Conley, A., & Dhillon, H. (2018). Fresno Building Healthy Communities (BHC) Timeline. Central Valley Health Policy Institute. California State University, Fresno. Accessed via: https://www.sutori.com/en/story/fresno-bhc-timeline--wGb27reQQeEt6ZoHv1qgPZfx

[33] San Joaquin Valley Fair Housing and Equity Assessment. Ramon D. Chacon, "A Case Study of Ghettoization and Segregation: West Fresno's Black and Chicano Community During the 1970s," Standford Center for Chicano Research. Working Paper Series No. 12 (Jan 1986): 2,5, 7, Table 4.

As a result of this outward expansion, the core of the city gradually became a severely concentrated area of poverty. Shaw Avenue, for example, is often described by local leaders as "an economic line of demarcation between the more affluent northern parts of Fresno and the modest-to-poorer neighborhoods in central and south Fresno." [34] Several stakeholders consulted during the Housing Element update process also provided local knowledge reiterating a trend of disinvestment in west and southwest Fresno due to urban sprawl. According to CSU Fresno researchers, "obsolete buildings, congested roads, difficult access, and increased crime rates coupled with lower land prices outside the city core, left [the city] less alluring than in previous decades. With less investment and fewer middle class residents, the quality of the community in terms of crime rates and school quality suffered. However, adoption of the General Plan in 2014 with its focus on downtown and infill investment, as well as the Transform Fresno program are current efforts to reverse these trends.

Redlining and Urban Renewal

Many of the racial and spatial divisions described in the assessment above originated through land use patterns that paved the way for rural and urban concentrated areas of poverty.The process of urban renewal, prevalent practices of redlining, and the construction of high density, low-income housing projects perpetuated the segregation of lower income communities of color on one side of town, and higher income communities on the other.

The Federal Housing Act of 1949 focused on eliminating substandard living conditions through the clearance of central-city slum areas and provided federal subsidies for cities attempting to remedy serious housing shortages. The Act originally centered on improving the housing stock in "blighted" communities and stipulated that all redevelopment projects be predominantly residential. During this era, government officials saw the opportunity to capitalize on state and national urban renewal programs to assist in the construction of State Routes 99, 41, and 180 to form a freeway loop through Downtown, redirect traffic around the city's core rather than through it. The construction of the freeway loop had a devastating impact on Downtown and its surrounding neighborhoods. The efforts resulted in the demolition of more than 20 blocks of residences in West Fresno and isolation of historic immigrant neighborhoods from the rest of the city. Formerly unified neighborhoods were cut in two by freeways without surface crossings. The new freeway cemented racial divides and led to the northern areas of the city becoming increasingly affluent and White, while the south became increasingly poor, Latino, Black or African American, and Asian. Facilitated by the freeways, the City continued to stretch onto inexpensive land to the north and east, aiding the migration of people and businesses away from the city.

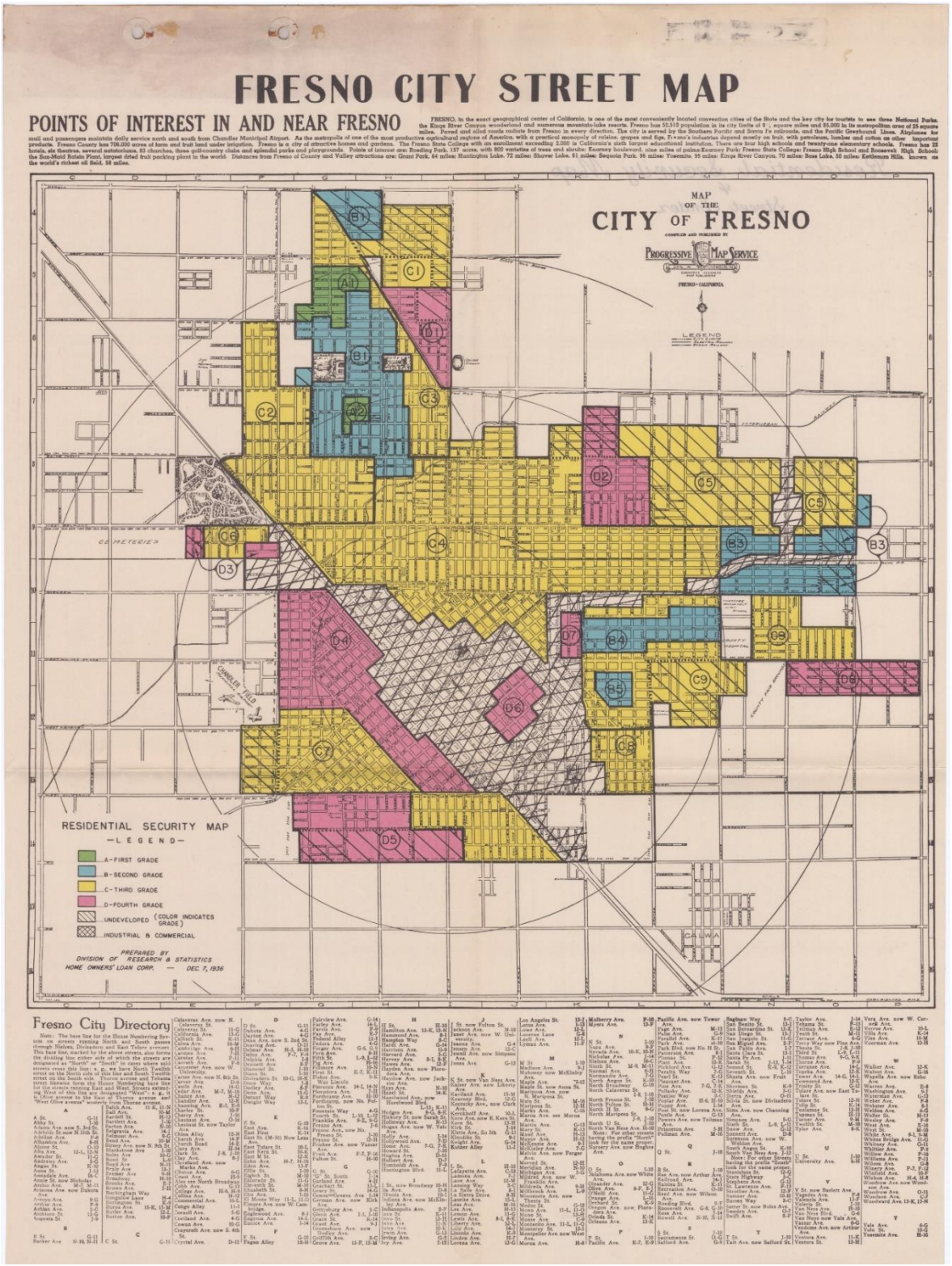
[34] Sheehan, T. 2019. "Fresno's Tale of Two Cities: Which neighborhoods receive the most government aid?" Fresno Bee. Available via: https://www.fresnobee.com/news/local/article236821658.html

[35] San Joaquin Valley Fair Housing and Equity Assessment, 2014. Available via: https://academics.fresnostate.edu/oced/documents/SJV_Fair-Housing-and-Equity-Assessment_April-2014.pdf

Redlining refers to the process of delineating neighborhoods worthy or unworthy of private investment. Even before the Depression, private lenders chose to avoid certain areas, particularly those home to certain ethic groups including Black or African Americans, new immigrants, and neighborhoods with older cheaper housing. During the 1930s, the federal government established the Home Owner's Loan Corporation (HOLC) and HOLC developed an evaluation method to rate neighborhoods based on their desirability. Investors categorized neighborhoods as "red" or "yellow" if there was said to be an "infiltration of undesirable populations" or a "lack of homogeneity." Once a neighborhood was "redlined," banks refused to grant home mortgages and loans to residents in the area. **Figure 1E-3.39** is an illustration of HOLC maps in Fresno. Red and yellow neighborhoods were prevalent. HOLC maps demonstrate the role that access to credit plays in the well-being of urban neighborhoods as most of the red and yellow neighborhoods remain low-income, low resource communities today.

[36] Amy E. Hillier. "Redlining and the Homeowners' Loan Corporation." of Urban History, Volume 29, Issue 4, 2003, pages 394-420. Available via: https://repository.upenn.edu/cgi/viewcontent.cgi?referer=https://www.google.com/&httpsredir=1&article=1002&context=cplan_papers

Figure 1E-3.39: HOLC Maps, Fresno, 1936



Source: Robert K. Nelson, LaDale Winling, Richard Marciano, Nathan Connolly, et al., "Mapping Inequality," American Panorama, ed. Robert K. Nelson and Edward L. Ayers, accessed November 22, 2022, https://dsl.richmond.edu/panorama/redlining/#loc=13/36.751/-119.834&city=fresno-ca.

Land Use and Zoning Patterns

Decisions regarding land use and zoning have a direct and profound impact on affordable housing and fair housing choice, shaping a community or region's potential diversity, growth, and access to opportunity. Zoning determines where housing can be built, the type of housing that is allowed, and the amount and density of housing that can be provided. Zoning also can directly or indirectly affect the cost of developing housing, making it harder or easier to accommodate affordable housing.

In Fresno, the Development Code (Chapter 15 of the Code of Ordinances) divides the city into 29 primary zoning districts, including six single family dwelling districts, three multifamily dwelling districts, one mobile/manufactured home district, and six mixed-use and Downtown residential districts, plus overlay zones (mostly related to historic and environmental resources protection). **Figure 1E-3.40** displays the City's Official Zoning Map. Through the adoption of the Fresno General Plan in 2014 and subsequent rezonings implemented through the new Development Code and Zoning Map in 2015, Fresno shifted from a preference for single-family detached housing to residential and mixed-use zones that allow more density and housing diversity. The Development Code and Zoning Map, however, still maintain single family detached only zoning districts (RE, RS-1, RS-2, and RS-3) – with no duplexes, townhomes, triplexes, row homes, garden homes, zero lot line dwellings, or the like. (Accessory/Secondary dwelling units are permitted, however, in all single-family districts.)

Affordable housing development typically requires high density zones to support construction and financing; therefore, zones limited to single dwelling units on each lot do not support affordable development. Although there are opportunities to expand the array of housing types in traditionally single-unit neighborhoods, multiplexes are not sufficient to accommodate housing needs for all economic segments of the community. The flexibility of multi-unit and mixed-use zoning increases opportunities for affordable housing.

As shown in **Figure 1E-3.40**, multi-family zones in Fresno are located along major corridors that span throughout the city. Rather than being concentrated in one area, the City has adopted amendments to the citywide development code to encourage higher density development along strategic infill corridors, referred to as Activity Centers in the Fresno General Plan. Some of these Activity Centers are generally located on land along the first phase of the BRT system, composed of corridors along Blackstone Avenue between Downtown and the major shopping centers from Herndon Avenue to Nees Avenue, and along Ventura Avenue-Kings Canyon Road from Downtown to Clovis Avenue.

Fresno has made significant policy changes to make it easier to build higher-density housing in Downtown and along Bus Rapid Transit (BRT) corridors, creating the first by-right zoning district in the city through the adoption of the Downtown Neighborhoods Community Plan in 2016 and lifting the caps off maximum dwelling units in mixed-use zone districts through the adoption of the mixed-use text amendment in 2022. Despite the policy changes, it continues to be difficult to build any new affordable housing without significant public subsidy.

Also, through the adoption of the Fresno General Plan in 2014, Fresno prioritized locating roughly one-half of future development in infill areas (within the city limits as of December 31, 2012) and roughly one-half of future development in growth areas. Tracking residential development from July 2013 to July 2020 as shown in **Table 1E-3.14** below, there were a total of 8,223 dwelling units built and the breakdown was as follows: 4,099 single family in city limits, 1,165 single family in Sphere of Influence (SOI), 2,787 multifamily in city limits, and 176 multifamily in SOI. A total of 6,886 dwelling units (84 percent) were built in the city limits and 1,341 dwelling units (16 percent) were built in the SOI.

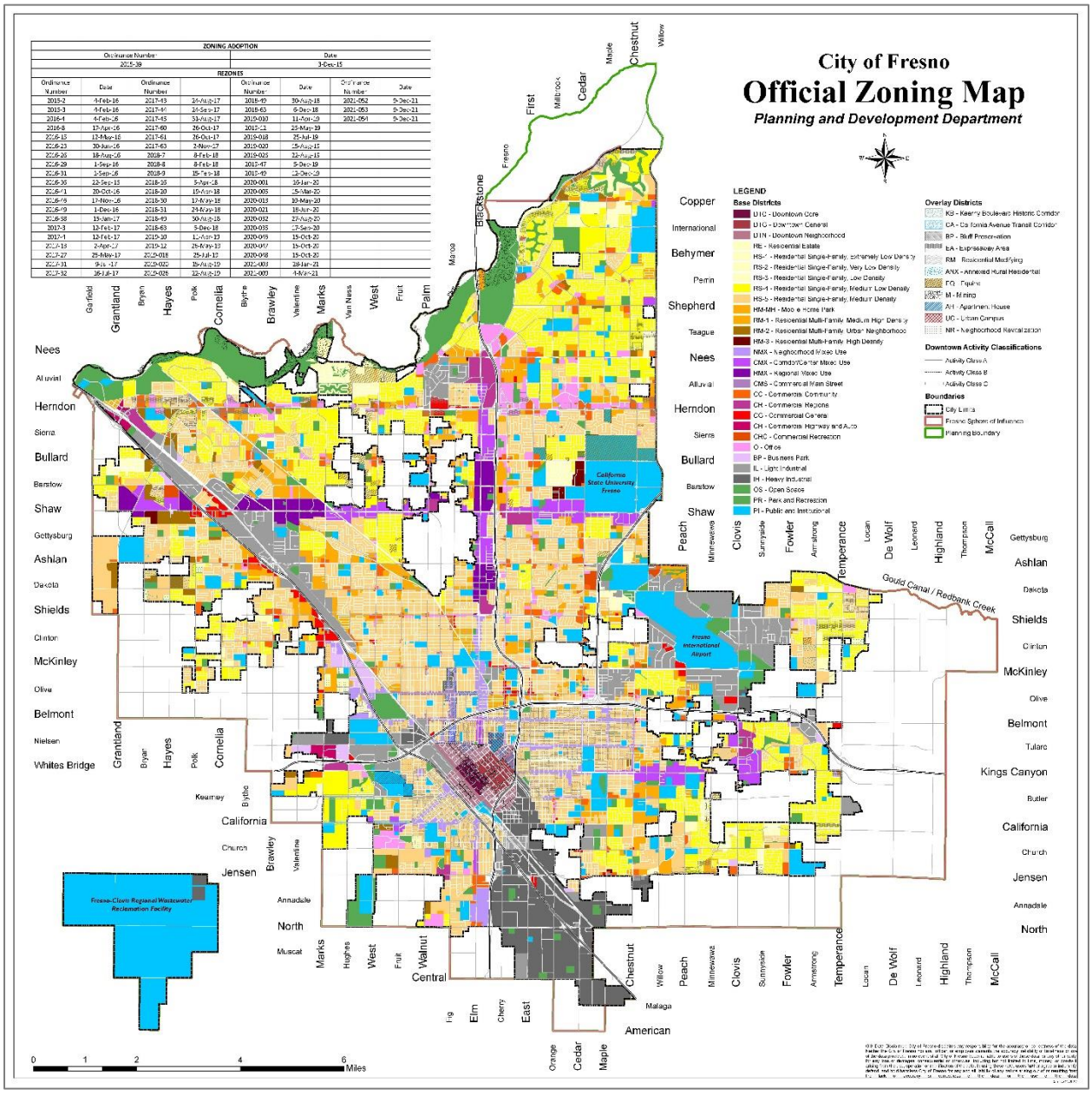
Table 1E-3.14: Residential Development Built Between July 2013 and July 2020

Area	Type of Dwelling Unit		Location of Development		Total
	Multifamily and Townhouse	Single Family	Dwelling Units in City Limits (December 31,2012)	Dwelling Units in Growth Areas (SOI) Annexed after December 31, 2012	
Downtown Planning Area and BRT Corridors	364	20	384	0	384
Established Neighborhoods South of Shaw	272	2,304	2,563	13	2,576
Established Neighborhoods North of Shaw	2,279	1,109	3,060	328	3,388
South Industrial	0	0	0	0	0
DA-1: North	7	834	658	183	841
DA-1: South	41	2	43	0	43
DA-2: North	0	279	0	279	279
DA-2: South	0	402	0	402	402
DA-3: Southeast	0	0	0	0	0
DA-4: East	0	116	0	116	116
DA-4: West	0	198	178	20	198
Sub Totals	*2,963*	*5,264*	*6,886*	*1,341*	*8,227*
Total Units 2013- 2020	**8,227**		**8,227**		**8,227**

Source: City of Fresno, Annual Progress Report submitted to The Governor's Office of Planning and Research, April 1, 2021. Retrieved from: https://www.fresno.gov/darm/wp-content/uploads/sites/10/2022/07/6_2020-General-Plan-Annual-Progress-Report.pdf.

In most cases, the Development Code and other land use code sections are reasonably permissive and allow for flexibility as to the most common fair housing issues. The highest density zones, and the majority of mobile home park designations are sited next to or close to State Routes. Medium and high density residential mixed use zones are equally distributed over all TCAC/HCD resource opportunity designations.

Figure 1E-3.40: Zoning Map, City of Fresno



Source: City of Fresno, 2022. Accessed January 2023.

Public Investment Patterns

Public and private investment typically includes construction, maintenance, and improvements to public facilities, including infrastructure, acquisition of land, and major equipment. Investments are typically prioritized based on need and available funding. Public investments such as subsidized housing, roads, infrastructure, and economic development can significantly impact access to opportunities in any given neighborhood. While the city has experienced patterns of disinvestment in certain areas particularly near the inner core of the city including such areas as Downtown, south, and southwest parts of the city, some of these patterns of disinvestment can be traced back to the variety of systemic factors that have influenced segregation nationwide including discriminatory lending practices, redlining, and urban renewal policies. Specific areas of the city have historically been underserved and have faced a lack of economic opportunity and social mobility, including various challenges like high poverty rates, limited job opportunities, and insufficient access to affordable housing or quality healthcare. This section will describe investments occurring in Fresno to improve quality of life throughout the city. In recent years, the City has focused on several key areas of investment, including:

- **Parks and Recreation:** The City recently adopted a Parks Transactions and Use Tax through ballot Measure P. Measure P was developed by Fresno for Parks, a diverse, non-partisan group of Fresno residents who believed that safer, cleaner parks for all Fresnans was important to the health, safety and overall quality of life of the community and placed the measure on the November 2018 ballot after gathering more than 35,000 signatures of local support. The citizen-led measure provides a guaranteed, local funding source for parks through a 3/8-cent sales tax in the city of Fresno. It generates an estimated $38 million per year to be used for clean and safe parks; new parks and recreation facilities; youth and senior recreation and after-school facilities and job training; improved walking and biking trails; the San Joaquin River Parkway; beautification of streets; and expanded access to arts and culture.
- **Public Safety:** Fresno has invested in public safety initiatives to reduce crime and improve community safety. These initiatives include the implementation of community policing programs and hiring more officers including the recently added Park Rangers to patrol city parks and addressing non-emergency calls for service while maintaining clean parks.
- **Economic Development:** To attract new businesses and create new job opportunities in the city, the City has invested in several economic development initiatives including business incubators, workforce training programs, and Downtown revitalization.
- **Transportation:** A multitude of transportation projects have been executed in the city to improve mobility and connectivity. Projects include the construction of new bike lanes, the expansion of the FAX bus system, and the development of the high-speed rail system. In September of 2013 the City of Fresno received a $15.9 million Transportation Investment Generating Economic Recovery (TIGER) grant from the U.S. Department of Transportation for the Fulton Mall Reconstruction Project which returned the Fulton Mall in Downtown to a complete street, reintroducing vehicle traffic to Downtown's former main street. The restoration of Fulton Main Street occurred over 11 city blocks and included bicycle and pedestrian accommodations, streetscape improvement elements, and integration of existing fountains and sculptures.

- **Housing:** The City also invests in housing initiatives to address housing needs in the city. The City utilizes Federal, State, and locally sourced funding to aid in the development of new housing, new affordable housing units, housing rehabilitation, displacement avoidance, emergency and supportive housing, and homebuyer assistance. In 2018, the City established its Rental Housing Registry Division of the Code Enforcement team. The purpose of the Rental Housing Division is to address the issue of substandard rental properties, promote greater compliance with health and safety standards and to preserve the quality of Fresno's neighborhoods and available housing opportunities. The goal is to work with property owners to achieve compliance of health and safety code violations that are a threat to the occupant's safety, structural integrity of the building, and have a negative impact on the surrounding neighborhoods.
- **Infrastructure:** In 2023, the City was awarded funding from HCD to finance key infrastructure improvements to water, sewer, streets, and parking to support a minimum of 862 Downtown housing units — of which 557 are marked for affordable housing.[37] On top of the $250 million in state funds for revitalizing Downtown over the next three years, the City is set to receive $43.7 million in state grants to build Downtown infrastructure for housing. The following estimates depict how the City intends to allocate this funding:
  - $16.8 million for sewer improvements
  - $14.3 million for water infrastructure improvements
  - $11.7 million for a structured parking garage on Fulton Street
  - $913,000 for street improvements near the Tuolumne Street and Van Ness Avenue intersection

High-Speed Rail Project

The California High Speed Rail project is a major infrastructure investment impacting multiple communities across the state. One line of the rail system is designed to connect San Francisco to Los Angeles, running through the San Joaquin Valley with a stop in Fresno. The Fresno Station will be located in Downtown between H and G Streets and Fresno and Tulare Streets. The California High Speed Rail Authority has been working closely with the City of Fresno to ensure that the project is completed successfully. The authority has conducted environmental studies, community outreach, and design work in Fresno to ensure that the project meets the needs of the community and is integrated into the existing transportation infrastructure. The City also dedicated staff to help relocate residents and businesses located in the proposed High Speed Rail right of way. Sometimes the City offered creative solutions to help incentivize the move such as offering publicly owned land at the convention center for the Cosmopolitan to build a new restaurant. The High Speed Rail is expected to be completed in several phases, with the first phase connecting San Francisco to Los Angeles by 2033.

[37] Shaikh Rahsad,O. 2023. "Fresno mayor wants 10,000 people to live in the city's downtown. Here's the plan." Fresnoland. Accessed via: https://fresnoland.org/2023/08/30/revitalizing-downtown-fresno/

The project is expected to create thousands of jobs in Fresno, providing employment opportunities and stimulating economic growth in Fresno. New businesses and new job opportunities in Fresno are likely to increase demand for housing. The improved transportation connectivity resulting from the High Speed Rail project could also increase mobility for commuter households that want to live in the city and commute elsewhere. Overall, the high-speed rail system is expected to promote transit-oriented development around the transit station in Fresno which could increase access to affordable housing for residents who rely on public transportation.

Funding for Housing, Economic, and Community Development

The City receives HUD funding for capital improvement projects in qualifying low- and moderate-income neighborhoods within the city's sphere of influence. The City's Public Works Construction Management Division typically oversees the infrastructure projects that are approved. More than $200 million in funding has gone toward CDBG projects during the previous Housing Element cycle. Projects included street construction, parks, traffic signal, sewer and water, and transportation projects.

In 2022 alone, the City initiated funding in two locations– the Burroughs Elementary Neighborhood Street Reconstruction Project (Phase I) and the West Fresno Elementary and MLK Neighborhood Street Improvements Project. The City also funded additional projects for overall neighborhood street improvements – the Yosemite Middle School Complete Streets Project, the Ericson Elementary Neighborhood Project, the Highway City Neighborhood Reconstruction Project, the Maple-Gettysburg-Holland Street Reconstruction Project, the Olive-Maple-Whitney-Chestnut Street Reconstruction Project, the Shields-Cedar-Dakota-Maple Street Reconstruction Project, and the Burroughs Elementary Neighborhood Street Reconstruction Project (Phase II). Across these eight projects, it is estimated that the City served 66,685 people.

The City also used $4.9 million in CDBG funds to acquire property on Blackstone Avenue for the future development of a senior center. The senior center is anticipated to be about 29,000 square feet and will provide various services and indoor and outdoor amenities.

The 2020-2024 Consolidated Plan also identifies Affordable Housing Development in high opportunity areas as a priority. In 2022, the City allocated $3.1 million in HOME funds for Affordable Housing Development or Rehabilitation and an additional $3.6 million in CDBG funds for land acquisition in support of affordable housing development. Additionally, the City allocated 28.5 percent of its third allocation of Permanent Local Housing Allocation (PLHA) for development of affordable multifamily rental housing and 28.5 percent for development of affordable single-family housing, focusing on areas of opportunity. Out of the total PLHA allocations, the City will have $4.1 million for the development of affordable multifamily rental housing and another $4.1 million for the development of single-family housing. The City is awaiting receipt of executed Standard Agreements from the State of California for these funds.

Priority Investments in Established Neighborhoods

Roughly one half of development in the city is anticipated to be within infill areas through 2035, as described in the General Plan. The other half or so of development in the city is anticipated to be in new growth areas, which include unincorporated land planned for urban use.

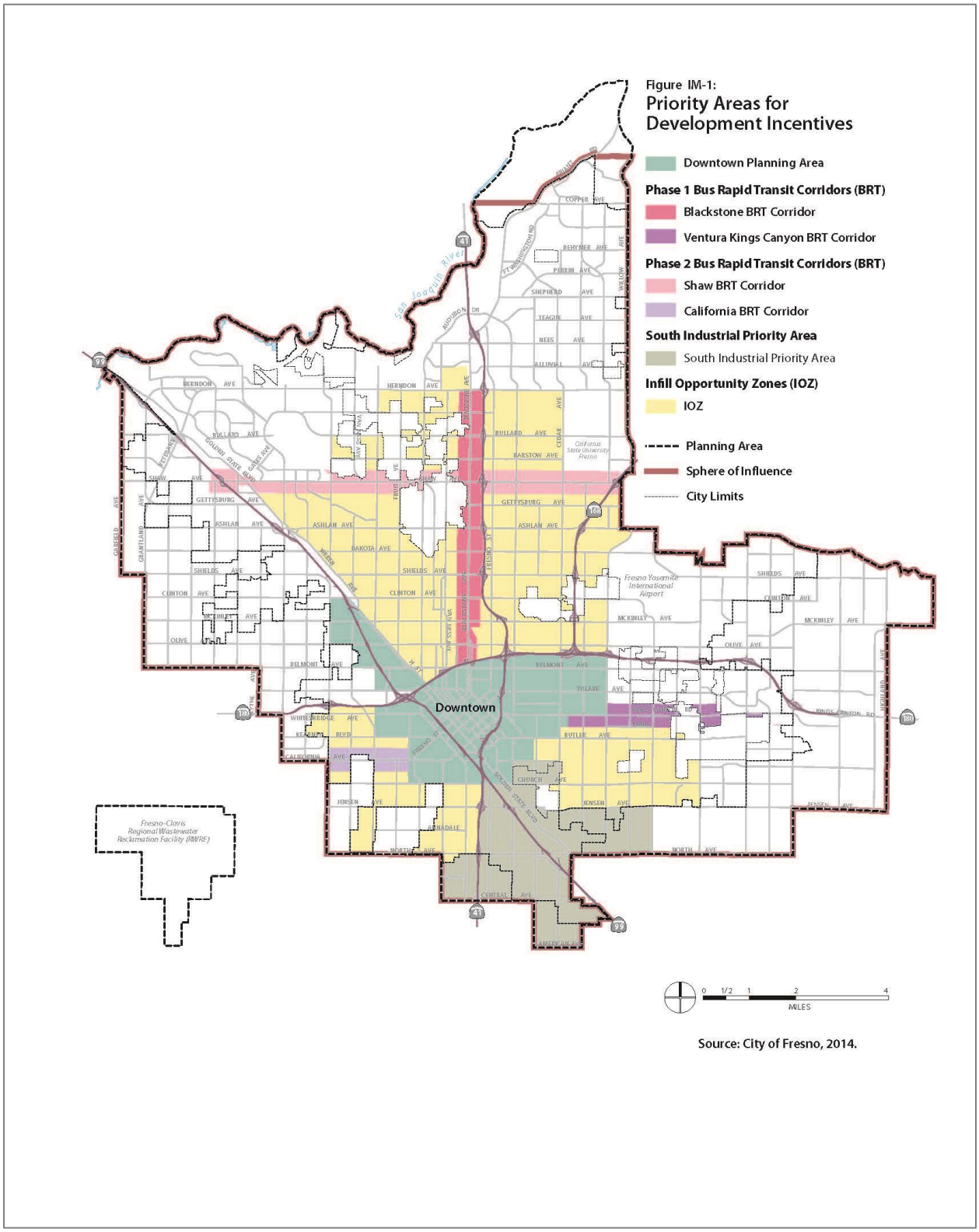
One of the City's primary planning considerations is to address the need for increasing the affordable housing opportunities for low- and moderate-income households, with special emphasis on persons with disabilities, people experiencing homelessness, large families, persons living in substandard housing, and persons paying rent that exceeds 50 percent of their monthly income. Through the General Plan, the City prioritized specific areas within the core of the city for incentives and other benefits to accelerate reinvestment and rehabilitation for homes and businesses.

Figure 1E-3.40 displays the City's Priority Areas for Development Incentives, these areas include:

- **"Infill Opportunity Zones" (IOZs) – Established Neighborhoods Generally South of Herndon Avenue,** including many of Fresno's established neighborhoods, which are in need of both large, catalytic reinvestment projects, as well as smaller-scale strategic interventions;
- **BRT corridors,** including the Phase 1 corridors along Blackstone Avenue and Ventura Avenue/Kings Canyon Road and the Phase 2 corridors along Shaw Avenue and California Avenue;
- **Downtown Planning Area,** which includes the Central Business District, Civic Center and other Downtown centers, Chinatown, South Stadium/South Van Ness, Downtown neighborhoods and special districts; and
- **South Industrial Area,** including much of Fresno's established heavy industrial uses, which may need infrastructure investment to meet the needs of major job-creation industry sectors, as well as improvements to enhance current business operations.

Priority for infrastructure projects will be given to serving established neighborhoods, including generally south of Herndon Avenue as shown in **Figure 1E-3.41: Priority Areas for Development Incentives**, along BRT and enhanced transit corridors, and in the Downtown Planning Area, consistent with General Plan policies.

Figure 1E-3.41: Priority Areas for Development Incentives, City of Fresno

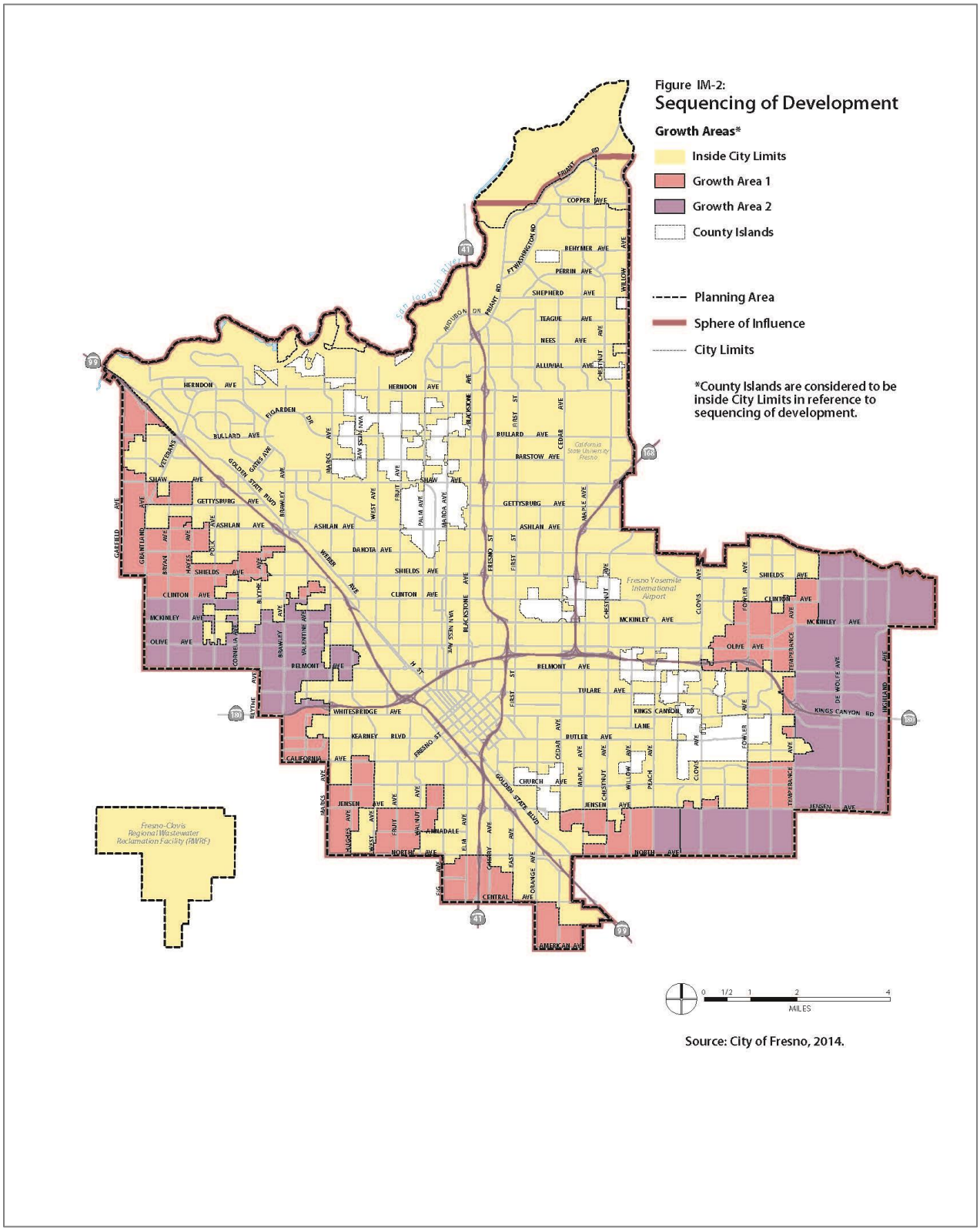


Source: City of Fresno, 2014. Figure 1M-1 of the Fresno General Plan.

Figure 1E-3.42 presents the sequencing of development on the fringe of the city, as presented in the City's General Plan. To prioritize infrastructure investments within Growth Area 1 the City considers planned infrastructure expansion, public service capacity, and other fiscal considerations. The boundaries of these areas are Development Areas 1 North, 1 South, 2 North, and 2 South. Growth Area 2 has significantly less access to completed infrastructure. Any development in these areas would require all infrastructure costs to be borne by the new development.

As part of the implementation of the Housing Element, programs are identified to upgrade the city's infrastructure as needed in low- and moderate-income neighborhoods with the greatest needs.

Figure 1E-3.42: Sequencing of Development, City of Fresno General Plan



Source: City of Fresno, 2014. Figure 1M-2 of the Fresno General Plan.

Building Healthy Communities Initiative

The City has been coordinating with community groups to address priorities of residents in south Fresno – generally those neighborhoods south of State Route 180. One such group, The California Endowment, launched a Building Healthy Communities Initiative (BHC). The BHC is a 10-year, $1 billion investment which began in 2010 with the goal of improving employment opportunities, education, housing, neighborhood safety, unhealthy environmental conditions, and inequitable access to healthy foods in 14 communities throughout the state. Central, Southeast, and Southwest Fresno have received and allocated funding as part of the BHC initiative. The BHC Initiative addresses a broad range of land use and social issues, which include:

- Ensure that the built environment is clean, well maintained, and conducive to health in all city neighborhoods and includes adequate and equitable provision of sewer and water within a reasonably priced homeownership market.
- Establish effective education and job training for area youth that is both academic and trade oriented.
- Ensure that underserved neighborhoods are included in strategies for job creation, including opportunities for home grown business development.
- Actively seek opportunities to create and maintain safe parks of all sizes in every city neighborhood to provide families with spaces to interact with their neighbors and promote physical activity.
- Create opportunities both public and private for the Downtown neighborhoods that include entertainment, stores (e.g., retail, food, clothing), parks, recreation centers and after school programs, especially for youth.
- Acknowledge and address attitudes within the government institutions, economic systems and law enforcement culture toward immigrant and ethnic minority communities that perpetuate inequality.
- Develop a system of transportation that responds to the needs of the most vulnerable sectors of the community, including focused bus routes for specific geographic areas of need and/or particularly vulnerable subgroups (e.g., the elderly, disabled and farm workers).
- Provide accessible healthcare services beyond emergency care.
- Establish an equitable system of public safety that supports community while also reducing crime.

Transform Fresno

As described previously the City is also actively engaged in the Transform Fresno initiative, which includes a number of community-driven projects to revitalize and improve the physical and social infrastructure in Chinatown, Downtown, and Southwest Fresno. Projects will reduce GHG emissions while also providing local environmental, health, and economic and social equity benefits. Much has happened after SGC's announcement of Fresno's TCC award in January 2018. From then through the close of the 2021-2022 fiscal year (June 30, 2022), a period of four and a half years, project partners have made considerable progress toward implementing an ambitious, unprecedented climate action initiative. Actions have included retrofitting homes to use less energy, increased urban tree cover, and workforce development.

Location of Existing Publicly Supported Housing

There are two divisions of Fresno Housing – one serves residents in the city of Fresno and the other serves residents in the greater Fresno County region. Fresno Housing's 2023 Annual Plan provide the most recent record of the public housing inventory. Fresno Housing reports that there are 4,912 public housing units and 10,638 housing choice vouchers in use, totaling 15,550 publicly supported housing units in the city of Fresno, see **Table 1E-3.15**. There are more than 43,000 subsidized affordable housing units in the county of Fresno as a whole.

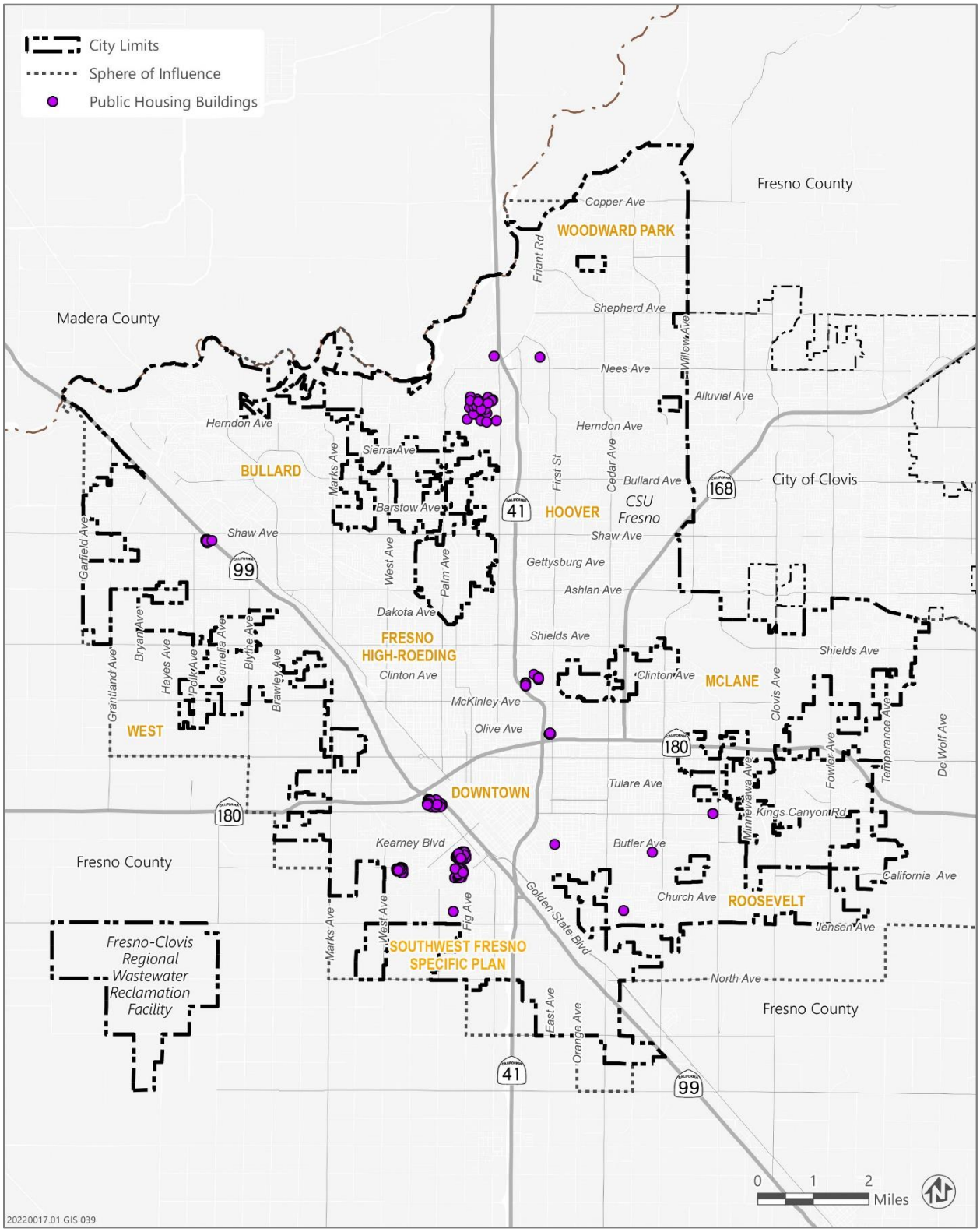
Table 1E-3.15: Public Housing Units by Fresno Housing, 2023

	Public Housing Units	Housing Choice Vouchers	Jurisdiction Total
City of Fresno Housing Authority	4,912	10,638	15,550
Housing Authority of the County of Fresno	19,505	8,294	27,799
Region Total	**24,417**	**18,932**	**43,349**

Source: 2023 Annual Plan for Fresno Housing and the City of Fresno.

Figure 1E-3.42 below depicts the location of individual buildings with public housing units throughout the city of Fresno, based on HUD's national feature layer "Public Housing Buildings" from the National Geospatial Data Asset dataset. Public housing comes in all sizes and types, from scattered single family houses to high-rise apartments for elderly families. HUD administers federal aid to local housing agencies that manage the housing for low-income residents at rents they can afford. HUD furnishes technical and professional assistance in planning, developing and managing these developments. Publicly supported housing in Fresno is concentrated in certain areas of the city including in existing neighborhoods north of Shaw Avenue as well as in the southwest neighborhoods west of State Route 41 and north of the industrial district. (**Figure 1E-3.43**).

Figure 1E-3.43: Public Housing Buildings



Source: HCD, AFFH 2.0 Data Viewer. HUD, 2021.

Food Access

Food access is another important component of access to opportunity, as access to food that is both affordable and nutritious is a challenge for many individuals and families in the United States. While data on food access by neighborhood or census tract is not available for the city of Fresno, stakeholders interviewed to prepare the 2020 Analysis of Impediments to Fair Housing Choice noted a lack of access to fresh food outlets in south and west Fresno.

In the survey issued to inform that planning process, respondents repeated concerns surrounding food access in the city, with 52 percent noting that grocery stores and other shopping opportunities are not equally provided. Only 22 percent of respondents described grocery stores and other shopping as equally provided in the city. As higher proportions of Hispanic residents live in south and west Fresno, lower levels of food access in these areas of the city may present fair housing concerns.

Enforcement and Outreach Capacity

Compliance with Fair Housing Laws

Fair housing enforcement and outreach capacity refers to the ability of a locality and fair housing entities to disseminate information related to fair housing laws and rights and provide outreach and education to community members. Enforcement and outreach capacity also includes the ability to address compliance with fair housing laws, such as investigating complaints, obtaining remedies, and engaging in fair housing testing. The Fair Employment and Housing Act and the Unruh Civil Rights Act are the primary California fair housing laws. California state law further extends anti-discrimination protections in housing to several classes that are not covered by the federal FHA of 1968, including prohibiting discrimination on the basis of sexual orientation.

California's Department of Fair Employment and Housing (DFEH) has statutory mandates to protect the people of California from discrimination pursuant to the California Fair Employment and Housing Act (FEHA), Ralph Civil Rights Act, and Unruh Civil Rights Act (with regards to housing).

- **FEHA** prohibits discrimination and harassment on the basis of race, color, religion, sex (including pregnancy, childbirth, or related medical conditions), gender, gender identity, gender expression, sexual orientation, marital status, military or veteran status, national origin, ancestry, familial status, source of income, disability, and genetic information, or because another person perceives the tenant or applicant to have one or more of these characteristics.
- **Unruh Civil Rights Act (Civ. Code, § 51)** prohibits business establishments in California from discriminating in the provision of services, accommodations, advantages, facilities and privileges to clients, patrons and customers because of their sex, race, color, religion, ancestry, national origin, disability, medical condition, genetic information, marital status, sexual orientation, citizenship, primary language, or immigration status.

- **Ralph Civil Rights Act (Civ. Code, § 51.7)** guarantees the right of all persons within California to be free from any violence, or intimidation by threat of violence, committed against their persons or property because of political affiliation, or on account of sex, race, color, religion, ancestry, national origin, disability, medical condition, genetic information, marital status, sexual orientation, citizenship, primary language, immigration status, or position in a labor dispute, or because another person perceives them to have one or more of these characteristics.

The City enforces fair housing and complies with fair housing laws and regulation through a twofold process: review of local policies and code for compliance with state law and the referral of fair housing complaints for investigation and resolution by the regional fair housing provider. **Table 1E-3.16** demonstrates the City's compliance with fair housing laws and other related laws.

In Fresno and Fresno County, local housing, social services, and legal service organizations include the Fair Housing Council of Central California, Central California Legal Services, California Rural Legal Services, and the Leadership Counsel for Justice and Accountability. A summary of each organization's focus is included in **Table 1E-3.17**.

Table 1E-3.16: City of Fresno Compliance with Fair Housing Laws

State Law/ Requirement	Description of Compliance
Housing Accountability Act and Housing Crisis Act. The Housing Accountability Act (Government Code Section 65589.5) limits the ability of a local government to deny, reduce the density of, or make infeasible housing development projects, emergency shelters, or farmworker housing that are consistent with objective local development standards and contribute to meeting housing need. The Housing Crisis Act of 2019, commonly known as Senate Bill 330 (SB 330) expedites permit processing for housing projects and restricts local governments' ability to downzone and limits fee increases on housing applications.	The City complies with the Housing Accountability Act and the Housing Crisis Act in reviewing and approving projects. The City has taken steps to facilitate housing in mixed use zones by removing maximum densities and adopting objective standards. Currently (2023), the City offers an optional preliminary application checklist for all entitlement applications to advise a prospective applicant of current City standards and requirements. Pre-application meetings have helped to shorten the review process and allow for better communication between applicants, City departments, and utility providers. The City has not yet developed an SB 330 preliminary application form, however it does enforce SB 330. The Housing Element includes a program to establish such an application to streamline processing procedures. The City complies with regulations set forth in state law for processing preliminary application for housing development projects, conducting no more than five hearings for housing projects that comply with objective general plan and development standards, and making a decision on a residential project within 90 days after certification of an environmental impact report, or 60 days after adoption of a mitigated negative declaration or an environmental report for an affordable housing project. The Housing Element includes a program to further review and amend site development and design standards in the Development Code for residential and mixed use zones to ensure standards are clear and objective (**Program 6** – Objective Design Standards).
Density Bonus. State Density Bonus Law (Gov. Code Section 65915-65918) allows developers to increase density on a property above the maximum set under a jurisdiction's General Plan land use plan if specific conditions are met.	The City complies with State density bonus law. The City has included **Program 25** (Development Code Amendments for Compliance with State Law and to Reduce Barriers to Housing Development) to amend the ordinance to be consistent with the most recent changes in state law and to continue to monitor density bonus law to make further modifications as needed.
No-Net-Loss. No Net Loss Law (Gov. Code Section 65863) requires a jurisdiction to always maintain a sufficient supply of adequate sites in its housing element throughout the housing element planning period to meet a jurisdiction's remaining unmet share of the Regional Housing Needs Allocation (RHNA) for each income category.	The City will continue to comply with No-Net-Loss through identifying a surplus of sites available to meet the RHNA allocation and tracking the remaining capacity as projects are approved on sites in the inventory (**Program 1**).
Least Cost Zoning Law. Gov. Code Section 65913.1 establishes a duty for local governments to designate and zone sufficient vacant land for residential use with appropriate standards. "Appropriate standards" means densities and requirements with respect to minimum floor areas, building setbacks, rear and side yards, parking, the percentage of a lot that may be occupied by a structure, amenities, and other requirements	The City conducted a comprehensive inventory of all vacant and non-vacant developable land within city limits, demonstrating that there is enough housing capacity to meet RHNA targets within the Housing Element planning period. By designating and zoning this land with appropriate standards, Fresno ensures the economic feasibility of producing housing at the lowest possible cost while balancing economic and environmental factors and maintaining public health and safety.

State Law/ Requirement	Description of Compliance
imposed on residential lots pursuant to the zoning authority which contribute to the economic feasibility of producing housing at the lowest possible cost given economic and environmental factors, the public health and safety.	
Fair Housing Law / Discrimination in Land Use. Government Code Section 65008 prohibits actions by a local government that deny residence, tenancy or ownership based on familial status or method of financing for proposed developments or intended occupancy of developments by persons of very low, low, moderate or middle-income.	The City complies with Government Code Section 65008. In addition, the Housing Element includes strategies to affirmatively further the objectives of fair housing law. Strategies include enforcing source of income protection and providing education to property owners on laws prohibiting the ability to refuse to rent to an applicant based on their source of income (**Program 20**); referring discrimination to appropriate State and Federal enforcement agencies (**Program 26**); and working to mitigate impediments to fair housing opportunities, with an emphasis on supporting the needs of populations and neighborhoods most impacted by fair housing issues (**Program 27**).
Anti-Discrimination. California Government Code Section 11135 prohibits discrimination on the basis of sex, race, color, religion, ancestry, national origin, ethnic group identification, age, mental disability, physical disability, medical condition, genetic information, marital status, or sexual orientation, and provides protection from discrimination from any program or activity that is conducted, funded directly by, or receives any financial assistance from the State.	The City of Fresno recognizes the rights of all its residents, workers, and visitors, including the right to reside, work, and visit. No discrimination shall be exercised, threatened or promised by any person in the employ of the city against or in favor of any applicant, eligible or employee because of any classification protected by state or federal law.
Local Fair Housing Enforcement	
Eviction Protection Program. The Eviction Protection Program (EPP) is a local program which defends tenants renting an apartment or house in the City of Fresno from unlawful eviction. If the City determines a tenant is potentially facing unlawful eviction, the tenant may be eligible to receive a City-appointed attorney or legal services to assist in the judicial process at no charge. This program is open to any City of Fresno resident who is facing an unlawful eviction regardless of financial or documented status.	
Emergency Rental Assistance Program. In response to the impacts of COVID-19, the City received nearly $64 million for emergency rental assistance from state and federal governments. The Emergency Rental Assistance Program provides relief to lower-income renters and landlords that were negatively impacted by COVID-19 and were unable to pay their rent and utilities. As of 2023, the City of Fresno's Emergency Rental Assistance Program has distributed all available funding and the program is now closed.	
Mobile Home Park Rent Review and Stabilization Program. Adopted in 1987, the purpose of this program is to protect mobile home park residents from excessive rent increases while at the same time providing mobile home park owners a level of rent sufficient to provide a just, fair and reasonable return on their investment in mobile home park property and to cover increased costs of repairs, maintenance, rehabilitation, capital improvements, services, amenities, upkeep and insurance. The ordinance provides a structure for consideration of proposed mobile home park rent increases through resident's committees and a Mobile Home Park Rent Review and Stabilization Commission. See Fresno Municipal Code Article 20 for more information.	

Source: City of Fresno, 2024.

Table 1E-3.17: Fair Housing Advocacy Organizations, Fresno County

Organization	Focus Area
Fair Housing Council of Central California	The Fair Housing Council of Central California is a professional, non-profit, civil rights organization dedicated to the elimination of discrimination in housing and the expansion of housing opportunities for all persons. The Fair Housing Council accomplishes its goal through the advocacy of equal housing opportunities, assisting victims of housing discrimination and enforcing compliance with fair housing laws, including the Community Reinvestment Act and the Equal Credit Opportunity Act. It provides a multifaceted program of private enforcement, education and outreach, research and advocacy to affirmatively further the goal of equal housing opportunity in the San Joaquin Valley
Central California Legal Services	Central California Legal Services Inc. is a private, not-for-profit, public interest law firm established for the purpose of providing free civil legal assistance to low-income individuals, families, organizations, and communities.
California Rural Legal Services	California Rural Legal Assistance, Inc. (CRLA) is a nonprofit law firm serving low-income residents of California's rural areas and small cities.
Community Housing Council of Fresno	Community Housing Council of Fresno (CHC) is a nonprofit organization which provides first time homebuyer assistance, counseling and other assistance to home buyers and owners who are struggling with their mortgage obligations.
Leadership Counsel for Justice and Accountability	The Leadership Counsel for Justice and Accountability (Leadership Counsel) advocates at the local, regional, and statewide levels on the overlapping issues of land use, transportation, climate change, safe and affordable drinking water, housing, environmental justice, equitable investment, and government accountability. Based in the San Joaquin and Eastern Coachella Valleys, Leadership Counsel services include community organizing, research, legal representation, and policy advocacy.
Resources for Independence Central Valley	Resources for Independence, Central Valley is 1 of 28 Centers for Independent Living in California. Independent Living Centers, like Resources for Independence Central Valley, are community-benefit, nonprofit organization run by and for persons with disabilities. Both the staff and board of directors must consist of at least 51 percent persons with disabilities. As a hub for independent living services and disability resources, Resources for Independence, Central Valley provides a foundation of core consumer-controlled, community-based, cross-disability and person-focused programs and assistance.
Central Valley Regional Center	Central Valley Regional Center is 1 of 21 regional centers in the State of California. Each regional center is a private non-profit entity on contract with California’s Department of Developmental Services (DDS). The Center’s mission is to help families and individuals with developmental disabilities.

Source: City of Fresno, Ascent, 2023.

Fair Housing Complaints

The City complies with federal and state fair housing laws, which are enforced by HUD and the California Department of Fair Employment and Housing (DFEH). Both the City and Fresno County refer discrimination complaints to FEH, which dual files fair housing cases with HUD's Region IX Office of Fair Housing and Equal Opportunity (FHEO), as part of the Fair Housing Assistance Program. In Fresno County, the most common types of housing discrimination complaints between 2006 and 2020 were discrimination on the basis of disability or race (see **Table 1E-3.18**).

Table 1E-3.18: Housing Discrimination Complaints Filed with HUD, Fresno County, 2006-2020

Basis of Complaint	Number of Complaints
Race	72
Color	7
National origin	28
Disability	136
Familial status	38
Religion	5
Sex	24
Retaliation	39
Total Complaints Filed	**272**

Source: HUD FHEO 2020.

HUD FHEO reported that there were 150 complaints filed by residents of the City of Fresno between 2015 and 2019. Of the complaints that resulted in a potential case, 76 cases were received and processed by HUD for housing in Fresno. As shown in **Table 1E-3.19**, disability was cited as the basis of discrimination in 42 cases, followed by race in 25 cases; retaliation in 11 cases; familial status in 9 cases; color in 6 cases; national origin in 5 cases; and sex in 5 cases. More than one basis of discrimination may be cited in a single complaint.

Table 1E-3.19: Housing Discrimination Complaints Filed with HUD, City of Fresno, 2015-2019

Basis of Complaint*	Number of Complaints
Race	25
Color	6
National origin	5
Disability	42
Familial status	9
Religion	0
Sex	5
Retaliation	11
Total Complaints Filed	**76**

**More than one basis of discrimination may be cited in a single complaint.*

Source: 2020 Analysis of Impediments to Fair Housing Choice, City of Fresno.

The City contracts with local fair housing service providers to support enforcement of State and federal Fair Housing Laws and provide fair housing services that include, but are not limited to, the following fair housing services:

- Referring inquiries and landlord/tenant complaints concerning housing discrimination to the applicable regulatory body (State Department of Fair Employment and Housing, HUD, or private counsel) for processing;
- Disseminating fair housing information citywide by sponsoring workshops, housing information fairs, monitoring of affirmative marketing, and working closely with the State Department of Fair Employment and Housing;
- Advertising fair housing laws and complaint procedures through literature displays at City and County offices, non-profit organizations such as Central California Legal Services, Lao Family Organization, Fresno Interdenominational Refugee Ministries, Central Valley Regional Center, property management organizations, lenders, and other such organizations. Literature is provided in English, Spanish, Hmong, Cambodian, Vietnamese, and Lao; and,
- Disseminating fair housing information through radio, television, and other media.

From 2016 to 2020, the City made annual CDBG contributions to the Fair Housing Council of Central California (FHCCC) for education, complaint, and referral services. During this time, FHCC addressed an average of 800 fair housing complaints per year. **Table 1E-3.20** displays the cases that were opened by FHCCC for further investigation and/or referral for relief. A small percentage of complaints were referred to HUD for administrative or injunctive relief. FHCCC's work often results in referral of cases to attorneys for further action or direct assistance to complainants. For example, FHCCC was able to cause reasonable accommodations to be provided that had initially been denied in several apartment complexes in Fresno.

Table 1E-3.20: Fair Housing Cases Opened by FHCCC, City of Fresno, 2017-2020

Discrimination Complaints (Protected Basis)	2017	2018	2019	2020
Race	35	78	65	28
Religion	2	0	-	2
Color	30	76	64	30
Sex/Gender	7	6	5	2
Disability	47	50	76	32
Familial Status	25	10	14	9
National Origin	8	56	31	3
Other State Violations (FEHA, Unruh, Ralph Civil Rights)	11	11	20	7
Total	**165**	**287**	**275**	**116**

Source: City of Fresno, Fair Housing Council of Central California Reports, 2017-2019

In 2021, CCLS received approximately 70 complaints of housing discrimination during the reporting period and made referrals, as appropriate, see **Table 1E-3.21**.

Table 1E-3.21: Discrimination Complaints, City of Fresno (March 1 – August 30, 2021)

Discrimination Complaints (Protected Basis)	Number of Complaints	Discrimination Complaints (Issue/Type)	Number of Complaints
Race	16	Rental	25
Religion	0	Sales	0
Color	4	Advertisement	0
Sex/Gender	7	Lending/Redlining	0
Handicap	2	Zoning	0
Familial Status	0	Accessibility	0
National Origin	3	Terms/Conditions	4
Other State Violations (FEHA, Unruh, Ralph Civil Rights)	4	Harassment	5
Total	**36**	**Total**	**34**

Source: City of Fresno, 2023. Central California Legal Services Quarterly Reports, 2021.

Since July 2021, the City has contracted with other service providers to provide various fair housing services including the Fresno Interdenominational Refugee Ministries (FIRM), Resources for Independence Central Valley, Inc. (RICV), Central California Legal Services (CCLS), and the Community Housing Council of Fresno. Through FIRM, in 2023-24, the City provided public Fair Housing education and outreach to 13,007 persons or households through webinars, in-person outreach events, ethnic media, and informational resource distribution both city-wide and by targeted canvassing (e.g., dropping materials off at relevant agencies and organizations). Outreach materials were distributed in five languages throughout areas where low-income Southeast Asian, Spanish, and Arabic-speaking communities congregate, including zip codes 93702, 93722, 93727, 93703, and 93725. RICV also worked on an outreach and education program for vulnerable populations in the city with specific emphasis on easy-to-understand information on housing rights, housing discrimination, housing resources and subsidies, and overall fair housing issues. Training and materials were made available through social media, direct mail, the RICV newsletter, and email blasts. RICV also distributed an easy-to-understand booklet to 217 low-income individuals through individual outreach. The City works with Central California Legal Services (CCLS) to refer inquiries and landlord/tenant complaints; and the Community Housing Council of Fresno to conduct fair housing workshops for prospective homebuyers and real estate/finance professionals.

Outreach Effectiveness

Outreach reached significantly more persons and households from the prior year (13,007 households in 2024 compared to 3,700 households in 2023). The zip codes where the outreach was conducted included portions of the central, southeast, and northwest portions of the City. Downtown (93721) Southwest Fresno (93706) areas were harder to document due to difficulty in securing trusted locations (usually markets and bakeries) and participants who decline to share their demographic information, but these areas also house populations that may be vulnerable to fair housing issues. Tables 1E – 3.3 Racial Segregation by Census Tract and 1E-3.7, Distribution of Poverty, show high concentrations of people of color and over 40 percent of households living in poverty in the Downtown and Southwest areas of Fresno. In addition, Table 1E-3.10 shows a high percentage of population with a disability in these areas. Program 26, Fair Housing, includes strengthened language to ensure fair housing outreach is conducted in all neighborhoods of high need.

Fair Housing Testing

FHCCC conducted a Systemic Testing project in Fresno. The target area was all available new home developments on the basis of race and familial status. During PY 2019, 16 paired tests (32 tests) were completed. 5 paired tests were conducted on the basis of race and 11 paired tests were conducted on the basis of familial status. All testing was done according to the available rental market. Testing at 25 properties were located within the metropolitan area with most of the area zip codes. Results showed that people of color suffered some form of housing discrimination in new developments across the city 48 percent of the time (i.e., refusal to rent, lying about availability, or imposing different rules, terms, or conditions of tenancy).

The Housing Element includes a program committing the City to continue working with local fair housing providers to ensure residents and landlords are aware of fair housing laws, rights, and requirements. Through this action, the City will ensure resources are accessible to residents should they experience discrimination.

Fair Housing Lawsuits

Several noteworthy lawsuits have been litigated during the previous Housing Element planning period regarding alleged housing discrimination practices affecting fair and affordable housing in Fresno or the region: a HUD negotiated settlement targeting unfair lending practices by California mortgage lenders and two state court lawsuits against local jurisdictions seeking to compel compliance with their obligations under their respective General Plans and Housing Elements to provide affordable housing and services to disadvantaged groups.

[Redacted] v. Benchmark Communities, LLC, FHEO Case No. 09-16-5484-8 (Title VIII) (HUD Conciliation Agreement entered March 7, 2017).

HUD facilitated a settlement agreement resolving accusations of unfair lending practices between a complainant and three California mortgage lenders, American Financial Network of Brea in Orange County, Benchmark Communities of Fresno, Brigantino Enterprise of Hollister, and also a Benchmark employee. The complainant filed a housing discrimination complaint with the FHEO in 2016 alleging he was unfairly denied an opportunity to pre-qualify for a mortgage loan based on his perceived Hispanic national origin, which precluded him from purchasing a home in Hollister. Equal access to credit for

qualified individuals, regardless of their national origin or other protected status, is an important element of fair housing. Benchmark agreed to provide annual fair housing training to employees who interact with prospective homebuyers. American Financial agreed to train current and new employees and pay the complainant $5,000 in damages.

Comunidades Unidas por un Cambio v. County of Fresno, Case Number 18CECG04586 (Fresno County Sup. Ct., file date Dec. 28, 2018).

In 2018, Comunidades Unidas por un Cambio (Communities United for Change) with the assistance of nonprofit Leadership Counsel for Justice & Accountability, filed an action against Fresno County and its Board of Supervisors seeking to enforce the County's obligations under its General Plan and Housing Element to facilitate the development and maintenance of affordable housing and to address the needs of disadvantaged unincorporated communities (specifically for clean water and functioning sewer services, stormwater drainage, and other infrastructure). The lawsuit outlines multiple deadlines the County has missed for accommodating affordable housing and improving infrastructure and other needs in historically disadvantaged communities. Plaintiffs allege that the County's failure to comply disproportionately impacts Latinos and other minority groups and deprives them of the opportunity to live in decent, quality affordable housing and healthy and complete neighborhoods.

The County asserted that it is currently in the midst of a revision and update to the General Plan that will include elements that address some of the purported concerns of the Plaintiffs. The County also contends that Plaintiffs' suit is premature because the County should be given more time to complete the action items and programs identified in its General Plan, and also argues that the deadlines and HCD guidelines that Plaintiffs claim the County has failed to meet are nonbinding. In 2020, the Superior Court ruled in favor of the plaintiff, and issued a Preemptory Writ of Mandate ordering the County to implement several specific programs of the Housing Element and bring the General Plan into compliance by analyzing infrastructure needs in historically disadvantaged communities. Comunidades Unidas waived the other allegations of housing discrimination in violation of FEHA and discriminatory land use actions in violation of state law.

Martinez v. City of Clovis, Case Number 19CECG03855 (Fresno County Sup. Ct., file date Oct. 23, 2019).

In 2019, Central California Legal Services (CCLS), on behalf of local citizens, filed suit in the Fresno County Superior Court against the City of Clovis alleging that the City's Housing Element was out of compliance with state law by failing to meet a commitment in the 2016 Housing Element to provide an adequate supply of suitably zoned land for lower-income housing development. The complaint also alleged that the inadequate supply of land zoned for affordable housing is discriminatory towards people based on race and income, in violation of both federal fair housing law and state law. The Superior Court ruled in favor of the plaintiff, finding that the City's application of a zoning overlay for affordable high-density housing does not sufficiently meet the City's obligation to provide suitably zoned land for housing affordable to lower-income households. The Court, however, did not find that the City's housing policy violated federal fair housing law or that its actions were discriminatory. The City contended that its Housing Element was in full compliance with all regulations governing affordable housing. The City appealed, and

in April 2023, the appellate court upheld the zoning inadequacy ruling but remanded discrimination claims for further proceedings. The California Supreme Court denied the City's petition for review in July 2023. A settlement was reached on February 20, 2024, in which the City agreed to implement several actions to facilitate affordable housing.

HCD Technical Assistance Letter

The City of Fresno is in receipt of a letter of Technical Assistance from the Department of Housing and Community Development dated August 7, 2024 noting the City Council's vote to decline funds for Fresno's Quality Inn Homekey project. The Technical Assistance letter analyzed the impact of this action in relation to the City's obligation to Affirmatively Further Fair Housing and requested that the City strengthen program commitments to discourage similar decisions in the future. A requirement has been added to Program 2-Variety of Housing Opportunities in High Resource Areas to include in project approval documents a statement of the City's obligation to Affirmatively Further Fair Housing and an accompanying analysis of project consistency with the law.

Housing Sites Analysis

State housing element law, Government Code Section 65583(c)(10), requires that the sites inventory (see Section 1E-2) be analyzed with respect to AFFH to ensure that affordable housing is dispersed equitably throughout the city rather than concentrated in areas of high segregation and poverty or low resource areas that have historically been underserved. By comparing the sites inventory to the fair housing indicators in this assessment, this section analyzes whether the sites included in the Housing Element sites inventory improve or exacerbate fair housing conditions, patterns of segregation, and access to opportunity throughout the city.

As determined by the Fresno Council of Governments (FCOG), the City of Fresno's Regional Housing Needs Allocation (RHNA) is a total of 36,866 new housing units. This RHNA includes 9,440 very low-income units, 5,884 low-, 5,638 moderate-, and 15,904 above moderate-income units. Note that the City's extremely low-income RHNA is equal to 50 percent of the very low-income RHNA allocation (4,720 units). Within the city limits, available vacant and underutilized sites are adequate to accommodate the RHNA for all income categories. A summary of Fresno's ability to meet the 2023-2031 RHNA of 36,866 housing units is provided in Section 1E-2: Sites Inventory. Using data and research from the HCD AFFH Data and Mapping Tool 1.0, **Table 1E-3.22** presents the housing unit capacity and existing conditions as they relate to indicators of fair housing analyzed in this assessment for each census tract in the city. For more information about the indicators, refer to the local assessment discussed previously in this chapter.

Table 1E-3.22: Housing Capacity by Census Tract, City of Fresno, 2023-2031

Census Tracts	Existing Households	Housing Capacity					Patterns of Segregation				Access to Opportunity				Disproportionate Housing Needs/ Displacement Risk			
		Low	Mod	Above Mod	Total	%of Total	Population Majority	Median Income	Disability Rates	R/ECAP or RCAA	TCAC Score	Jobs Index	CES4 Scores	SB 35 DAC	Overcrowding	Overpayment (Renters)	Overpayment (Homeowners)	Displacement Risk
1.00	804	685	206	400	1,291	3.0%	Hispanic/Latino	<$55,000	<30%	R/ECAP	No Data	>80	>90-100	DAC	<8.2%	40%-60%	No Data	Y
2.00	728	471	0	140	610	1.4%	Hispanic/Latino	<$55,000	10%-20%	R/ECAP	HSR	>80	>90-100	DAC	15%-20%	40%-60%	20%-40%	Y
3.00	1,103	667	97	539	1,303	3.0%	Hispanic/Latino	<$55,000	20%-30%	R/ECAP	HSR	>80	>90-100	DAC	15%-20%	40%-60%	20%-40%	Y
4.00	1,337	781	0	418	1,199	2.8%	Hispanic/Latino	<$55,000	10%-20%	R/ECAP	HSR	>80	>90-100	DAC	>20%	40%-60%	<20%	Y
5.01	829	18	0	18	35	0.1%	Hispanic/Latino	<$55,000	10%-20%	R/ECAP	HSR	>80	>90-100	DAC	>20%	60%-80%	60%-80%	Y
5.02	1,019	141	0	174	315	0.7%	Hispanic/Latino	<$55,000	10%-20%	R/ECAP	HSR	>80	>90-100	DAC	>20%	40%-60%	<20%	Y
6.01	1,763	0	0	219	219	0.5%	Hispanic/Latino	<$55,000	10%-20%	R/ECAP	HSR	>80	>90-100	DAC	>20%	40%-60%	60%-80%	Y
6.02	366	625	0	389	1,014	2.3%	Hispanic/Latino	<$55,000	10%-20%	R/ECAP	HSR	>80	>90-100	DAC	>20%	40%-60%	60%-80%	Y
7.01	785	47	0	25	72	0.2%	Hispanic/Latino	No Data	20%-30%		HSR	>80	>90-100	DAC	12%-15%	40%-60%	60%-80%	Y
7.02	426	778	0	1,633	2,410	5.5%	Hispanic/Latino	<$55,000	20%-30%		HSR	>80	>90-100	DAC	12%-15%	40%-60%	60%-80%	Y
9.01	760	547	0	619	1,166	2.7%	Hispanic/Latino	<$55,000	10%-20%		HSR	>80	>90-100	DAC	12%-15%	40%-60%	20%-40%	Y
9.02	1,578	468	0	317	785	1.8%	Hispanic/Latino	<$55,000	10%-20%	R/ECAP	HSR	>80	>90-100	DAC	>20%	60%-80%	60%-80%	Y
10.00	1,179	179	273	625	1,078	2.5%	Hispanic/Latino	<$55,000	10%-20%	R/ECAP	HSR	>80	>90-100	DAC	15%-20%	60%-80%	60%-80%	Y
11.00	754	41	0	161	202	0.5%	Hispanic/Latino	<$55,000	10%-20%	R/ECAP	HSR	>80	>90-100	DAC	>20%	40%-60%	60%-80%	Y
12.01	1,387	0	0	59	59	0.1%	Hispanic/Latino	<$55,000	10%-20%	R/ECAP	HSR	60-80	>90-100	DAC	>20%	40%-60%	20%-40%	Y
12.02	1,147	0	75	328	403	0.9%	Hispanic/Latino	<$55,000	10%-20%		Low	40-80	>90-100	DAC	15%-20%	40%-60%	40%-60%	Y
13.01	1,521	109	12	72	192	0.4%	Hispanic/Latino	<$55,000	10%-20%	R/ECAP	Low	20-80	>90-100	DAC	15%-20%	60%-80%	40%-60%	Y
13.03	613	0	6	2	8	0.0%	Hispanic/Latino	<$55,000	10%-20%	R/ECAP	HSR	60-80	>90-100	DAC	>20%	40%-60%	<20%	Y
13.04	1,475	0	44	43	87	0.2%	Hispanic/Latino	<$55,000	10%-20%	R/ECAP	HSR	40-60	>90-100	DAC	>20%	40%-60%	60%-80%	Y
14.07	1,526	117	4	21	142	0.3%	Hispanic/Latino	<$55,000	10%-20%	R/ECAP	HSR	20-40	>80-90	DAC	12%-15%	60%-80%	40%-60%	Y
14.08	1,082	0	0	3	3	0.0%	White	$55,001-$87,100	<30%		Moderate	20-40	>60-70	DAC	<8.2%	40%-60%	20%-40%	Y
14.09	660	0	8	9	17	0.0%	White	$87,101-$99,999	10%-20%	RCAA	High	20-40	>50-60		<8.2%	<20%	20%-40%	
14.11	2,099	403	240	70	712	1.6%	Hispanic/Latino	$55,001-$87,100	10%-20%		High	20-60	>80-90	DAC	15%-20%	40%-60%	20%-40%	Y
14.12	755	0	0	162	162	0.4%	White	$55,001-$87,100	10%-20%		High	20-40	>60-70		<8.2%	40%-60%	20%-40%	
14.13	1,846	42	0	39	81	0.2%	Hispanic/Latino	$87,101-$99,999	<10%		High	<20	>60-70	DAC	<8.2%	40%-60%	20%-40%	
14.15	1,481	0	121	751	872	2.0%	Hispanic/Latino	$55,001-$87,100	10%-20%		Low	20-60	>80-90	DAC	12%-15%	40%-60%	20%-40%	
14.16	1,271	0	396	176	572	1.3%	Hispanic/Latino	$55,001-$87,100	10%-20%		Low	20-40	>80-90	DAC	12%-15%	40%-60%	20%-40%	
14.17	1,684	77	0	282	359	0.8%	Hispanic/Latino	$100,000-$149,999	10%-20%		High	<20	>70-80		8.3-12%	40%-60%	20%-40%	
14.18	731	1,005	0	26	1,031	2.4%	Hispanic/Latino	$100,000-$149,999	10%-20%		High	<20	>70-80		8.3-12%	60%-80%	20%-40%	
15.00	627	0	0	0	0	0.0%	Hispanic/Latino	<$55,000	10%-20%	R/ECAP	Low	>80	>90-100	DAC	<8.2%	40%-60%	40%-60%	Y
18.00	1,299	0	0	0	0	0.0%	Hispanic/Latino	<$55,000	10%-20%		Low	>80	>90-100	DAC	8.3-12%	20%-40%	20%-40%	
20.00	1,969	906	1	195	1,102	2.5%	Hispanic/Latino	<$55,000	10%-20%	R/ECAP	HSR	<20-80	>90-100	DAC	12%-15%	40%-60%	60%-80%	Y
21.00	2,080	0	2	27	29	0.1%	Hispanic/Latino	$55,001-$87,100	10%-20%		Low	40-80	>90-100	DAC	8.3-12%	40%-60%	20%-40%	Y
22.00	1,490	0	0	64	64	0.1%	Hispanic/Latino	<$55,000	10%-20%		Moderate	40-80	>80-90	DAC	<8.2%	40%-60%	40%-60%	Y

Census Tracts	Existing Households	Housing Capacity					Patterns of Segregation				Access to Opportunity				Disproportionate Housing Needs/ Displacement Risk			
		Low	Mod	Above Mod	Total	%of Total	Population Majority	Median Income	Disability Rates	R/ECAP or RCAA	TCAC Score	Jobs Index	CES4 Scores	SB 35 DAC	Overcrowding	Overpayment (Renters)	Overpayment (Homeowners)	Displacement Risk
23.00	1,299	71	0	120	191	0.4%	Hispanic/Latino	<$55,000	10%-20%		HSR	60->80	>90-100	DAC	8.3-12%	60%-80%	40%-60%	Y
24.00	1,474	33	50	32	115	0.3%	Hispanic/Latino	<$55,000	10%-20%	R/ECAP	HSR	60->80	>90-100	DAC	12%-15%	60%-80%	40%-60%	Y
25.01	1,214	0	0	41	41	0.1%	Hispanic/Latino	<$55,000	10%-20%	R/ECAP	HSR	20-60	>90-100	DAC	15%-20%	60%-80%	20%-40%	Y
25.02	1,233	0	13	50	63	0.1%	Hispanic/Latino	<$55,000	10%-20%	R/ECAP	HSR	40-80	>90-100	DAC	>20%	60%-80%	40%-60%	Y
26.01	1,380	36	0	33	69	0.2%	Hispanic/Latino	<$55,000	10%-20%	R/ECAP	HSR	40-<80	>90-100	DAC	15%-20%	60%-80%	20%-40%	Y
26.02	990	0	0	31	31	0.1%	Hispanic/Latino	<$55,000	10%-20%		Moderate	60->80	>90-100	DAC	8.3-12%	60%-80%	20%-40%	Y
27.01	1,300	0	0	60	60	0.1%	Hispanic/Latino	<$55,000	10%-20%		HSR	20-40	>80-90	DAC	15%-20%	60%-80%	40%-60%	Y
27.02	1,272	21	0	66	86	0.2%	Hispanic/Latino	<$55,000	10%-20%	R/ECAP	HSR	20-40	>90-100	DAC	>20%	60%-80%	40%-60%	Y
28.00	1,356	351	7	61	419	1.0%	Hispanic/Latino	<$55,000	10%-20%	R/ECAP	HSR	20-40	>90-100	DAC	>20%	60%-80%	40%-60%	Y
29.03	1,206	130	70	99	299	0.7%	Hispanic/Latino	<$55,000	20%-30%	R/ECAP	HSR	20-40	>80-90	DAC	>20%	60%-80%	20%-40%	Y
29.04	860	0	0	5	5	0.0%	Hispanic/Latino	<$55,000	10%-20%		Low	20-40	>70-80	DAC	8.3-12%	60%-80%	20%-40%	Y
29.05	888	0	0	9	9	0.0%	Hispanic/Latino	<$55,000	10%-20%		HSR	20-60	>80-90	DAC	<8.2%	40%-60%	40%-60%	Y
29.06	1,583	0	0	0	0	0.0%	Hispanic/Latino	<$55,000	10%-20%	R/ECAP	Moderate	40-80	>70-80	DAC	>20%	40%-60%	20%-40%	Y
30.01	916	503	57	3	562	1.3%	Hispanic/Latino	<$55,000	10%-20%	R/ECAP	Low	40-60	>90-100	DAC	15%-20%	60%-80%	20%-40%	Y
30.03	1,083	256	0	3	259	0.6%	Hispanic/Latino	<$55,000	10%-20%	R/ECAP	HSR	20-40	>80-90	DAC	15%-20%	60%-80%	20%-40%	Y
30.04	650	116	19	20	155	0.4%	Hispanic/Latino	$55,001-$87,100	20%-30%		Moderate	20-40	>70-80	DAC	<8.2%	40%-60%	20%-40%	Y
31.04	1,679	0	0	0	0	0.0%	White	$55,001-$87,100	10%-20%		High	60-80	>60-70		<8.2%	20%-40%	40%-60%	Y
32.01	1,708	0	6	1	7	0.0%	Hispanic/Latino	$55,001-$87,100	10%-20%		Low	20-60	>90-100	DAC	12%-15%	40%-60%	20%-40%	Y
32.02	1,581	0	4	0	4	0.0%	Hispanic/Latino	<$55,000	10%-20%		HSR	20-60	>90-100	DAC	>20%	60%-80%	20%-40%	Y
33.01	1,138	224	0	0	224	0.5%	Hispanic/Latino	<$55,000	10%-20%	R/ECAP	Moderate	20-40	>80-90	DAC	15%-20%	60%-80%	40%-60%	Y
33.02	1,668	0	0	2	2	0.0%	Hispanic/Latino	$55,001-$87,100	10%-20%		Moderate	20-40	>80-90	DAC	8.3-12%	40%-60%	<20%	Y
34.01	1,109	0	0	5	5	0.0%	Hispanic/Latino	<$55,000	10%-20%	R/ECAP	HSR	40-60	>90-100	DAC	8.3-12%	60%-80%	20%-40%	Y
34.02	710	0	0	5	5	0.0%	Hispanic/Latino	<$55,000	10%-20%	R/ECAP	HSR	40-60	>90-100	DAC	8.3-12%	60%-80%	20%-40%	Y
35.00	2,183	142	16	18	176	0.4%	Hispanic/Latino	$55,001-$87,100	20%-30%	R/ECAP	Moderate	20-60	>80-90	DAC	8.3-12%	60%-80%	20%-40%	Y
36.00	1,820	0	0	9	9	0.0%	White	$55,001-$87,100	10%-20%		High	20-60	>40-50		<8.2%	20%-40%	20%-40%	
37.01	1,026	0	0	4	4	0.0%	Hispanic/Latino	<$55,000	10%-20%	R/ECAP	Low	20-40	>80-90	DAC	12%-15%	40%-60%	20%-40%	Y
37.02	1,671	0	23	0	23	0.1%	Hispanic/Latino	<$55,000	10%-20%		HSR	<20-60	>90-100	DAC	8.3-12%	40%-60%	40%-60%	Y
38.04	1,704	0	0	136	136	0.3%	Hispanic/Latino	$55,001-$87,100	10%-20%		Moderate	<20	>60-70	DAC	8.3-12%	40%-60%	20%-40%	
38.05	2,095	83	197	130	410	0.9%	Hispanic/Latino	<$55,000	10%-20%		Low	<20-40	>90-100	DAC	12%-15%	60%-80%	60%-80%	Y
38.07	1,056	0	91	155	246	0.6%	Hispanic/Latino	<$55,000	10%-20%		HSR	<20-60	>90-100	DAC	<8.2%	40%-60%	20%-40%	Y
38.08	1,584	0	0	122	122	0.3%	Hispanic/Latino	$55,001-$87,100	10%-20%		High	<20	>60-70	DAC	12%-15%	40%-60%	20%-40%	
38.09	1,369	0	521	173	694	1.6%	Hispanic/Latino	<$55,000	<10%		Low	40-80	>80-90	DAC	12%-15%	40%-60%	20%-40%	
38.10	1,787	171	0	157	327	0.8%	Hispanic/Latino	$55,001-$87,100	10%-20%		High	20-40	>60-70		8.3-12%	40%-60%	20%-40%	
38.11	1,979	262	0	58	320	0.7%	Hispanic/Latino	$55,001-$87,100	10%-20%		High	<20	>60-70	DAC	8.3-12%	>80%	20%-40%	
38.12	539	525	244	3,235	4,005	9.2%	Hispanic/Latino	$100,000-$149,999	10%-20%		High	<20	>60-70	DAC	8.3-12%	>80%	20%-40%	
42.05	1,883	430	50	53	532	1.2%	Hispanic/Latino	$55,001-$87,100	10%-20%		HSR	60-80	>80-90	DAC	<8.2%	40%-60%	20%-40%	Y

Census Tracts	Existing Households	Housing Capacity					Patterns of Segregation				Access to Opportunity				Disproportionate Housing Needs/ Displacement Risk			
		Low	Mod	Above Mod	Total	%of Total	Population Majority	Median Income	Disability Rates	R/ECAP or RCAA	TCAC Score	Jobs Index	CES4 Scores	SB 35 DAC	Overcrowding	Overpayment (Renters)	Overpayment (Homeowners)	Displacement Risk
42.08	2,421	0	0	4	4	0.0%	White	$87,101-$99,999	<10%	RCAA	Highest	<20	>30-40		<8.2%	40%-60%	20%-40%	
42.10	1,300	0	4	3	7	0.0%	White	<$55,000	10%-20%		High	<20-40	>40-50		<8.2%	40%-60%	20%-40%	Y
42.11	2,408	0	0	0	0	0.0%	White	$55,001-$87,100	10%-20%		High	<20-40	>60-70		<8.2%	40%-60%	20%-40%	
42.12	4,323	241	109	26	376	0.9%	Hispanic/Latino	$55,001-$87,100	10%-20%		High	20-80	>70-80	DAC	8.3-12%	40%-60%	20%-40%	
42.13	1,302	0	0	0	0	0.0%	White	$55,001-$87,100	10%-20%		High	60-80	>40-50		<8.2%	20%-40%	<20%	
42.14	1,932	0	0	4	4	0.0%	White	$87,101-$99,999	20%-30%		Highest	20-60	>20-30		<8.2%	20%-40%	20%-40%	
42.15	1,345	1,056	0	15	1,070	2.5%	White	$55,001-$87,100	10%-20%		High	<20	>60-70		<8.2%	40%-60%	20%-40%	
42.16	1,441	0	184	0	184	0.4%	White	$55,001-$87,100	10%-20%		High	<20	>60-70	DAC	<8.2%	40%-60%	20%-40%	
42.17	987	367	90	96	553	1.3%	Hispanic/Latino	<$55,000	10%-20%		Moderate	40-60	>80-90	DAC	<8.2%	40%-60%	40%-60%	
42.18	1,853	2,032	1,937	695	4,665	10.7%	Hispanic/Latino	$87,101-$99,999	10%-20%		Moderate	20-40	>80-90	DAC	<8.2%	>80%	40%-60%	
43.01	1,745	68	0	13	81	0.2%	White	$150,000-$199,999	10%-20%	RCAA	Highest	40-80	>20-30		<8.2%	40%-60%	20%-40%	
43.02	1,897	0	0	0	0	0.0%	White	$100,000-$149,999	10%-20%	RCAA	Highest	60->80	>30-40		<8.2%	40%-60%	20%-40%	
43.03	1,948	0	0	2	2	0.0%	White	$87,101-$99,999	10%-20%	RCAA	Highest	60-80	>30-40		<8.2%	60%-80%	20%-40%	
44.04	984	342	0	92	434	1.0%	Hispanic/Latino	<$55,000	10%-20%		Moderate	>80	>90-100	DAC	>20%	40%-60%	20%-40%	Y
44.05	1,363	0	0	0	0	0.0%	White	$100,000-$149,999	10%-20%	RCAA	Highest	60-80	>20-30		<8.2%	40%-60%	<20%	
44.06	2,393	0	0	0	0	0.0%	White	$55,001-$87,100	<10%		Highest	>80	>30-40		<8.2%	40%-60%	20%-40%	
44.09	1,168	0	0	0	0	0.0%	White	$55,001-$87,100	10%-20%		High	>80	>60-70		<8.2%	20%-40%	20%-40%	
44.10	1,039	0	0	0	0	0.0%	White	$55,001-$87,100	<10%		Highest	>80	>40-50		8.3-12%	20%-40%	20%-40%	
44.11	777	0	0	66	66	0.2%	White	$87,101-$99,999	<10%		Highest	>80	>40-50		8.3-12%	40%-60%	20%-40%	
45.03	2,183	0	35	0	35	0.1%	White	$55,001-$87,100	20%-30%		High	>80	>50-60		<8.2%	40%-60%	40%-60%	
45.04	2,078	99	0	243	342	0.8%	White	<$55,000	10%-20%		High	>80	>80-90	DAC	<8.2%	40%-60%	40%-60%	Y
45.05	2,083	836	217	57	1,110	2.6%	Hispanic/Latino	$55,001-$87,100	10%-20%	R/ECAP	Moderate	60-80	>80-90	DAC	<8.2%	40%-60%	<20%	Y
45.06	1,418	150	0	6	156	0.4%	White	$87,101-$99,999	10%-20%	RCAA	Highest	>80			<8.2%	40%-60%	<20%	
46.01	1,383	19	10	3	32	0.1%	White	$55,001-$87,100	10%-20%		High	40-80	>40-50		<8.2%	40%-60%	<20%	
46.02	913	59	5	0	64	0.1%	White	$87,101-$99,999	<10%	RCAA	Highest	60-80	>40-50		<8.2%	40%-60%	<20%	
47.03	1,181	0	0	0	0	0.0%	Hispanic/Latino	<$55,000	10%-20%		Moderate	20-60	>70-80	DAC	<8.2%	40%-60%	40%-60%	Y
47.04	1,515	0	24	63	86	0.2%	Hispanic/Latino	<$55,000	10%-20%	R/ECAP	HSR	<20-40	>80-90	DAC	>20%	60%-80%	20%-40%	Y
47.05	654	0	0	0	0	0.0%	Hispanic/Latino	<$55,000	10%-20%		Moderate	40-80	>70-80	DAC	<8.2%	60%-80%	20%-40%	Y
47.06	1,812	0	0	0	0	0.0%	Hispanic/Latino	<$55,000	10%-20%		Moderate	40-80	>70-80	DAC	<8.2%	40%-60%	20%-40%	Y
48.01	1,791	0	0	0	0	0.0%	Hispanic/Latino	$55,001-$87,100	<10%	R/ECAP	HSR	20-40	>60-70		12%-15%	40%-60%	40%-60%	Y
48.02	1,441	0	84	0	84	0.2%	Hispanic/Latino	<$55,000	10%-20%	R/ECAP	HSR	<20-40	>70-80	DAC	15%-20%	60%-80%	40%-60%	Y
49.01	1,659	0	12	3	15	0.0%	Hispanic/Latino	$55,001-$87,100	10%-20%		High	40-60	>50-60		12%-15%	40%-60%	20%-40%	Y
49.02	735	0	0	0	0	0.0%	Hispanic/Latino	$55,001-$87,100	10%-20%		High	40-60	>40-50		8.3-12%	40%-60%	20%-40%	
50.00	1,518	628	1	16	646	1.5%	White	$55,001-$87,100	10%-20%		Moderate	60->80	>80-90	DAC	<8.2%	40%-60%	20%-40%	
51.00	2,220	32	305	335	672	1.5%	Hispanic/Latino	<$55,000	10%-20%		HSR	40-80	>90-100	DAC	<8.2%	60%-80%	20%-40%	Y
52.02	1,139	0	0	0	0	0.0%	Hispanic/Latino	<$55,000	10%-20%		HSR	20-60	>90-100	DAC	>20%	>80%	40%-60%	Y

Census Tracts	Existing Households	Housing Capacity					Patterns of Segregation				Access to Opportunity				Disproportionate Housing Needs/ Displacement Risk			
		Low	Mod	Above Mod	Total	%of Total	Population Majority	Median Income	Disability Rates	R/ECAP or RCAA	TCAC Score	Jobs Index	CES4 Scores	SB 35 DAC	Overcrowding	Overpayment (Renters)	Overpayment (Homeowners)	Displacement Risk
52.03	1,595	0	0	12	12	0.0%	Hispanic/Latino	<$55,000	10%-20%		HSR	20-60	>80-90	DAC	<8.2%	60%-80%	20%-40%	Y
52.04	1,287	0	5	16	21	0.0%	Hispanic/Latino	<$55,000	10%-20%		Moderate	40-80	>80-90	DAC	<8.2%	40%-60%	40%-60%	Y
53.01	1,866	0	0	0	0	0.0%	Hispanic/Latino	$55,001-$87,100	10%-20%		Moderate	60-80	>80-90	DAC	<8.2%	40%-60%	20%-40%	Y
53.02	1,888	0	0	11	11	0.0%	Hispanic/Latino	<$55,000	10%-20%		HSR	60-80	>70-80		<8.2%	40%-60%	40%-60%	Y
53.04	2,076	0	0	14	14	0.0%	Hispanic Latino	<$55,000	10%-20%		Moderate	60-80	>70-80		<8.2%	40%-60%	20%-40%	
53.05	1,149	0	27	12	39	0.1%	Hispanic/Latino	$55,001-$87,100	10%-20%		Moderate	40-80	>80-90	DAC	<8.2%	40%-60%	20%-40%	Y
54.03	1,647	158	0	2	160	0.4%	Hispanic/Latino	<$55,000	10%-20%	R/ECAP	HSR	>80	>80-90	DAC	8.3-12%	60%-80%	20%-40%	
54.05	1,759	0	0	0	0	0.0%	White	$55,001-$87,100	10%-20%		High	>80	>60-70		<8.2%	20%-40%	20%-40%	
54.06	1,475	0	0	5	5	0.0%	White	$55,001-$87,100	10%-20%		High	>80	>60-70		<8.2%	40%-60%	20%-40%	
54.07	1,338	0	0	0	0	0.0%	White	$55,001-$87,100	10%-20%		High	60-80	>40-50		<8.2%	40%-60%	<20%	
54.08	321	0	0	0	0	0.0%	White	$55,001-$87,100	<10%	R/ECAP	Low	60-80	>90-100	DAC	<8.2%	40%-60%	<20%	
54.09	1,297	0	0	2	2	0.0%	White	$55,001-$87,100	10%-20%		Moderate	>80	>60-70	DAC	8.3-12%	60%-80%	20%-40%	
54.10	1,057	23	0	3	26	0.1%	White	$55,001-$87,100	10%-20%		Moderate	>80	>70-80	DAC	8.3-12%	40%-60%	<20%	
55.03	2,369	211	89	1,241	1,541	3.5%	White	$100,000-$149,999	<10%	RCAA	Highest	<20-40	>10-20		<8.2%	60%-80%	20%-40%	
55.04	1,001	0	0	13	13	0.0%	White	$100,000-$149,999	<10%	RCAA	Highest	<20	>20-30		<8.2%	20%-40%	20%-40%	
55.05	1,834	0	0	0	0	0.0%	White	$100,000-$149,999	10%-20%	RCAA	Highest	<20	>20-30		<8.2%	40%-60%	20%-40%	
55.07	2,214	50	0	13	63	0.1%	White	$100,000-$149,999	<10%	RCAA	Highest	40-80	>10-20		<8.2%	40%-60%	<20%	
55.08	2,094	0	0	30	30	0.1%	White	$100,000-$149,999	<10%	RCAA	Highest	<20-60	>10-20		<8.2%	20%-40%	20%-40%	
55.09	1,690	59	232	187	478	1.1%	White	$55,001-$87,100	10%-20%		Highest	40-80	>50-60		<8.2%	40%-60%	20%-40%	
55.16	2,775	0	0	1	1	0.0%	White	$87,101-$99,999	<10%	RCAA	Highest	<20-60	>30-40		<8.2%	40%-60%	20%-40%	
55.26	799	0	0	2	2	0.0%	White	$55,001-$87,100	10%-20%		Highest	>80	>40-50		<8.2%	40%-60%	<20%	Y
55.27	1,407	81	0	0	81	0.2%	White	$55,001-$87,100	10%-20%		Highest	60-80	>40-50		<8.2%	40%-60%	<20%	Y
55.28	659	0	0	0	0	0.0%	White	$87,101-$99,999	<10%	RCAA	Highest	<20	>10-20		<8.2%	40%-60%	20%-40%	
55.29	1,993	0	0	6	6	0.0%	White	$100,000-$149,999	<10%	RCAA	Highest	<20	>10-20		<8.2%	60%-80%	20%-40%	
56.05	500	0	0	0	0	0.0%	White	$87,101-$99,999	10%-20%	RCAA	High	60-80	>30-40		<8.2%	20%-40%	20%-40%	
58.04	1,942	0	0	0	0	0.0%	White	$55,001-$87,100	10%-20%		High	60-80	>60-70	DAC	<8.2%	20%-40%	20%-40%	Y
58.05	2,096	68	154	532	754	1.7%	White	$55,001-$87,100	10%-20%	RCAA	Highest	60-80	>50-60		<8.2%	40%-60%	20%-40%	
59.04	1,895	0	0	263	263	0.6%	White	$87,101-$99,999	10%-20%	RCAA	Highest	20-40	>40-50		<8.2%	20%-40%	20%-40%	
86.00	1,289	718	199	1,176	2,093	4.8%	Hispanic/Latino	<$55,000	10%-20%		Low	60-80	>90-100	DAC	12%-15%	40%-60%	20%-40%	Y
Total		**18,755**	**6,579**	**18,179**	**43,512**	**100.0%**												

R/ECAP = Racially/Ethnically Concentrated Area of Poverty RCAA=Racially Concentrated Area of Affluence HSR= High Segregation & Poverty CES4=CalEnviroScreen 4.0 DAC= Disadvantaged Community

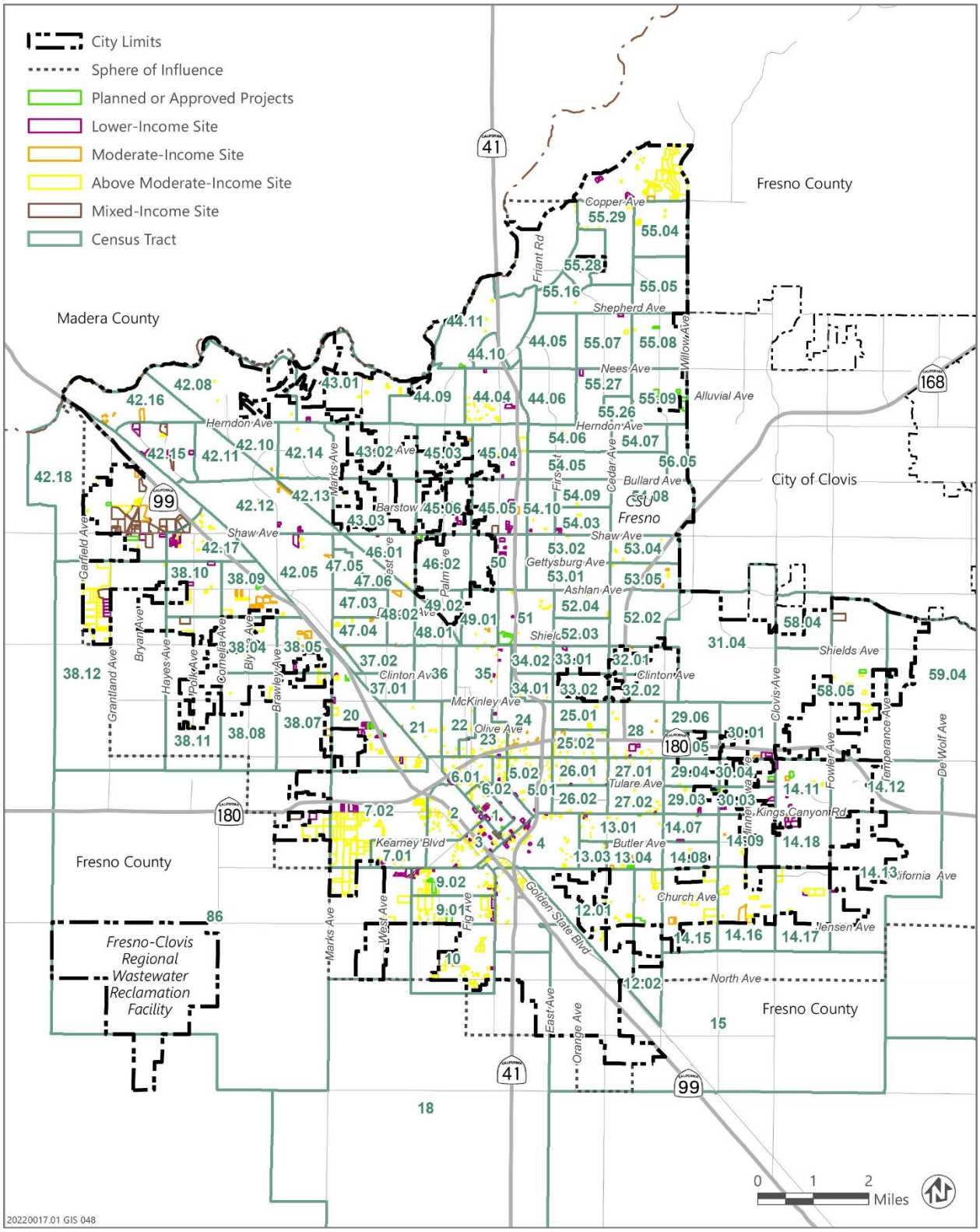
Source: City of Fresno, Ascent, 2024.

There are 135 census tracts in the city. **Figure 1E-3.44** displays the housing capacity identified in the sites inventory relative to the city's census tracts. The housing capacity identified in the Draft Housing Element is generally distributed throughout the city with the greatest opportunities in the Downtown, along commercial corridors designated for mixed use development, and in the new growth areas at the periphery of the city. As shown in **Figure 1E-3.45**, the West Area contains the most capacity from the inventory (26 percent of the total identified capacity) followed by Downtown (20 percent), the Southwest Fresno Specific Plan area (16 percent), and the Roosevelt Community Plan area (14 percent). The distribution of sites across the city displays a concentration of lower-income housing in areas like Downtown and the West Area, while other areas like McLane and Woodward Park have a higher proportion of moderate and above moderate-income housing, reflecting an unequal distribution of housing capacity across the city. This has the potential to exacerbate fair housing issues in Fresno by providing more capacity for lower-income housing in disproportionately impacted communities. The Housing Element includes several policies and programs to address these issues (see **Table 1E-3.28** at the end of this section for a summary of these actions).

Relative to all of the census tracts within the city, two census tracts have slightly higher concentrations than the rest. These are census tracts 38.12 and 42.18 which account for 9.2 percent and 10.7 percent of the housing capacity for the Draft Housing Element respectively. These tracts are located west of Highway 99 within the West Area. The West Area is one of the City's new growth areas in which the City is preparing a Specific Plan that provides significant opportunities for new higher density, mixed use neighborhoods, which will be integrated with the urbanized areas of Fresno to the east through future BRT corridors.

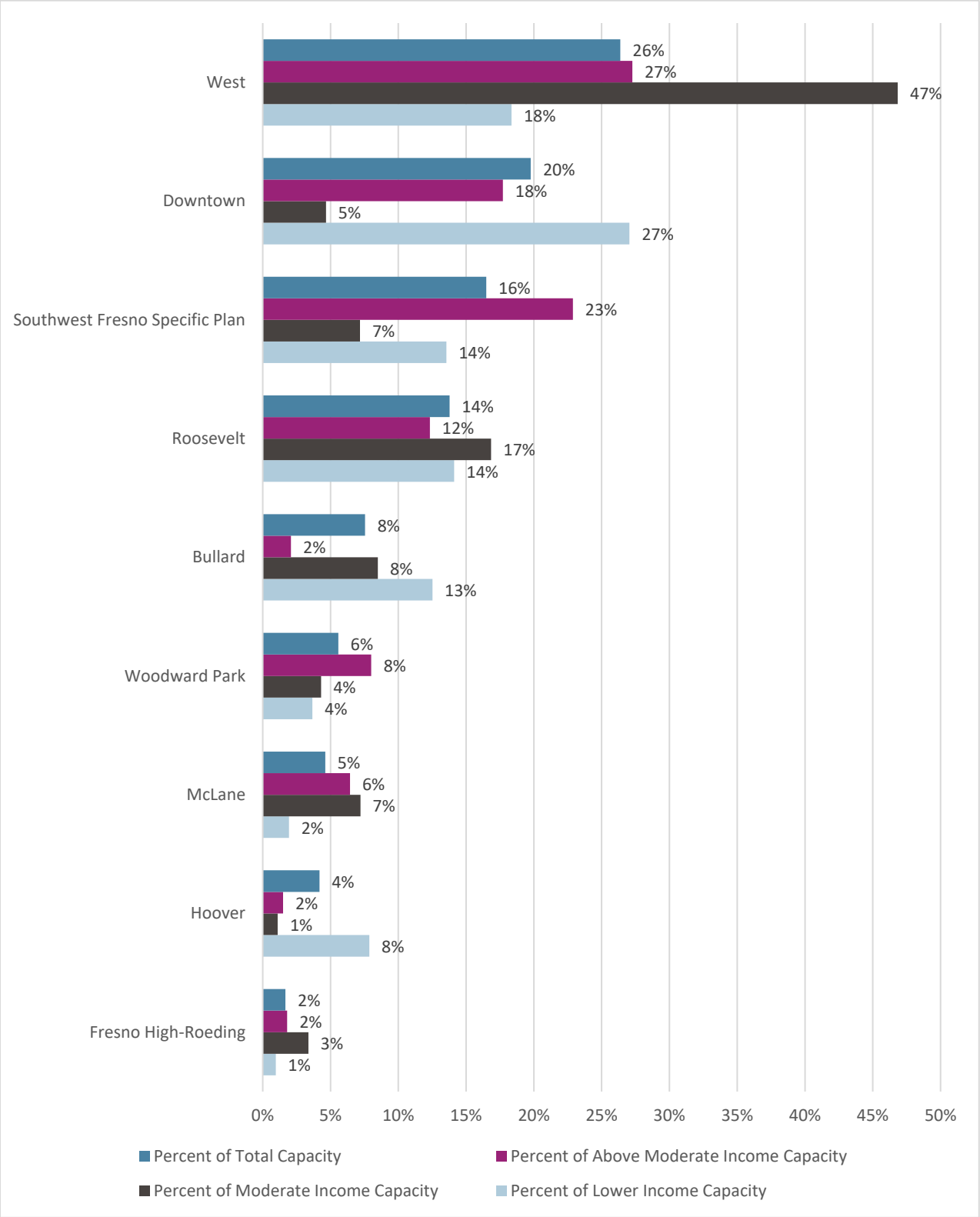
Census tract 38.12, on the periphery of the West Area, is largely vacant land zoned to accommodate medium density residential single-family development (RS-5 zoning), but also contains zoning for higher density multi-family housing. The inventory identifies capacity for 525 lower-income units, 244 moderate-income units, and 3,235 above moderate- income units in tract 38.12. It is a high resource area and there is a substantial amount of developable land in the area. The majority of the population in this census tract is Hispanic/Latino, although there are only about 539 existing households in the census tract. Median incomes typically average between $100,000 and $149,000. Although it is classified as high resource, it is also designated as an SB 35 Disadvantaged Community (DAC). This is in line with an estimated 85 percent of the city's land area being designated as a DAC. The addition of housing units in this census tract on sites identified in the Housing Element inventory will likely improve performance indicators.

Figure 1E-3.44: Sites Inventory by Census Tract, City of Fresno, September 2024



Source: City of Fresno, Ascent, 2024.

Figure 1E-3.45: Distribution of Housing Capacity by Community Plan/Specific Plan Area



Source: City of Fresno and Ascent, 2024.

Census tract 42.18 is in the boundaries of the proposed West Area Neighborhood Specific Plan (WANSP). The Housing Element inventory identifies capacity for 2,032 lower-income units, 1,937 moderate-income units, and 695 above moderate- income units in tract 42.18. Given the significant amount of land zoned for high-density mixed use in this area, this is where the highest portion of the capacity for lower- and moderate-income units are. In total, there is capacity for 3,227 units included in the sites inventory in the West Shaw Avenue Town Center alone, including 1,177 lower-income, 1,585 moderate-income, and 395 above moderate-income units. Because the area has been and continues to transition from agriculture to urban development, many of the sites are larger in size than sites in other parts of the city. Approximately 1,853 people currently live in this census tract; households are predominantly Hispanic/Latino with mostly moderate- and lower- income households. Median incomes are generally moderate (exactly or within the range of $87,101-$99,999) and lower income (less than $50,000). The Town Center provides an opportunity for more rental developments at higher densities that could produce affordable housing units for lower- and moderate- income households. There is a substantial amount of developable land in the area, and it is currently designated moderate resource. The addition of a Town Center also provides foundations to increase access to opportunities, amenities, and resources.

Sites in the inventory are also distributed throughout the city's established neighborhoods north and south of Shaw Avenue. This includes in the Hoover community area, the Fresno High-Roeding community, McLane, and Roosevelt community. As there is little vacant land for new development in these neighborhoods, they contribute minimally to the overall housing capacity identified in the Housing Element inventory. For example, approximately 2 percent of the total inventory identified is in Fresno High-Roeding, comprising 1 percent of the lower-income capacity, 3 percent of the moderate-income capacity, and 2 percent of the above moderate-income capacity. Moreover, the Hoover and McLane communities account for 4 percent and 5 percent of the inventory respectively (see **Table 1E-3.23**).

With regards to fair housing indicators, the established neighborhoods north of Shaw Avenue –including the Woodward Park, Bullard, and Hoover communities– have higher percentages of White residents with higher household incomes. According to the TCAC Opportunity Index, these communities have greater life outcomes for children from lower income households. Educational outcomes are higher in these communities than other areas of the city, there is greater labor market engagement, and environmental conditions are generally better. While the capacity in these areas is less than other community plan areas in the city, **Table 1E-3.23** shows that the Housing Element identifies capacity for over 7,500 new housing units in the Woodward Park, Bullard, and Hoover community plan areas including an estimated 4,500 for lower-income households. More affordable housing in these areas will provide greater access to opportunity for lower-income residents.

Table 1E-3.23: Housing Capacity by Community Plan/Specific Plan Area

	Lower-Income Housing Capacity	Percent of Lower-Income Capacity	Mod-Income Housing Capacity	Percent of Mod-Income Capacity	Above Mod-Income Housing Capacity	Percent of Above Mod-Income Capacity	Total Capacity	Percent of Total Capacity
Bullard	2,348	12.5%	559	8.5%	377	2.1%	3,284	7.5%
Downtown	5,072	27.0%	307	4.7%	3,221	17.7%	8,600	19.8%
Fresno High-Roeding	180	1.0%	221	3.4%	327	1.8%	729	1.7%
Hoover	1,476	7.9%	72	1.1%	273	1.5%	1,821	4.2%
McLane	362	1.9%	474	7.2%	1,170	6.4%	2,006	4.6%
Roosevelt	2,648	14.1%	1,108	16.8%	2,241	12.3%	5,997	13.8%
Southwest Fresno Specific Plan	2,541	13.5%	472	7.2%	4,160	22.9%	7,173	16.5%
West	3,441	18.3%	3,081	46.8%	4,956	27.3%	11,478	26.4%
Woodward Park	687	3.7%	283	4.3%	1,454	8.0%	2,425	5.6%
CITYWIDE	**18,755**	**100.0%**	**6,579**	**100.0%**	**18,179**	**100.0%**	**43,512**	**100.0%**

Source: City of Fresno and Ascent, 2024.

In the established neighborhoods south of Shaw Avenue –including Fresno High-Roeding and McClane neighborhoods—fair housing indicators convey moderate fair housing conditions. These communities have a greater amount of diversity and are more racially integrated, as shown in **Figure 1E-3.3** previously in this section. However, there are higher poverty rates than in northern Fresno neighborhoods. Fresno High-Roeding and McClane also contain several of the city's identified R/ECAP areas. Notably, the eastern portion of McClane does not follow the same trends. Fair housing conditions in the eastern McClane community plan area reflect more positive outcomes that are in line with North Fresno and Clovis neighborhoods (e.g., it is classified as a RCAA as opposed to a R/ECAP, there are higher TCAC opportunity scores, fewer disproportionate housing needs, and less risk of displacement). About 12 percent of the moderate-income capacity (740 units) is identified in McLane which reflects the amount of area zoned for multi-family residential with densities below 30 units per acre. The addition of moderate-income housing is not likely to impact fair housing conditions in the McLane community. Depending on the type of housing that is built, it may alleviate pressure for housing in the developed core of the city. The Fresno High-Roeding community area has minimal housing capacity identified across all income levels in the Housing Element inventory.

The City's developed core neighborhoods – including Downtown and the Southwest Fresno Specific Plan area – have the poorest fair housing conditions. These communities contain the majority of the City's R/ECAP areas as well as areas classified as high segregation and poverty by the 2021 TCAC Opportunity Index. Fair housing indicators show that there are higher rates of overcrowding and housing cost burden as well as higher percentages of Housing Choice Voucher usage in these communities. In addition, there is lower academic performance, fewer educational resources, low engagement with the labor market, and very poor environmental conditions. In fact, nearly 70 census tracts in Fresno are considered a SB 35 disadvantaged community, comprising an estimated 85 percent of the city's land area.[38] Downtown Fresno, with its high density of housing and commercial activity, faces challenges such as air pollution, noise, and limited green spaces. The concentration of traffic and industrial activities contributes to higher levels of air pollutants, which can adversely affect residents' health. However, efforts to revitalize Downtown, including the introduction of more green spaces and improved public transportation, aim to mitigate these environmental health issues and make the area more livable.

In the Southwest Fresno Specific Plan area, environmental health conditions are impacted and often more severe. This area has historically been home to a higher concentration of industrial facilities and lower-income housing, leading to issues such as poor air quality, soil contamination, and inadequate access to clean water and green spaces. Residents in this area are more likely to be exposed to environmental hazards, which can have significant impacts on health outcomes. Given the proximity to industrial uses, the City reviewed sites in the inventory adjacent to existing industrial uses, specifically near State Route 41, and removed those sites which would be most impacted during the timeframe of this Housing Element. These conditions present challenges for increasing housing capacity, as new developments must address and mitigate these environmental health risks to create safe and healthy living environments.

As shown in **Table 1E-3.23**, both Downtown and the Southwest Fresno specific plan area contain a high capacity of the sites inventoried in this Housing Element. This includes 27 percent of the lower-income capacity and 20 percent of the above moderate-income capacity identified in the Downtown Community Plan area; and, 14 percent of the lower-income capacity and 16 percent of the above moderate income capacity in the Southwest Fresno Specific Plan area. While new lower income housing in these areas could help to alleviate the demand for housing in communities that are already experiencing poverty, it could reinforce patterns of concentrated poverty in these areas. Both Downtown and Southwest Fresno are susceptible to displacement pressure as new developments are built. There are about 7,380 units of above moderate-income housing inventoried in the Housing Element in these communities. Consequently, future development has the potential to exacerbate disproportionate housing needs including risk of displacement. Notably, the capacity for higher density development can provide affordable housing for lower-income households and more options to mitigate displacement for residents.

[38] Under Senate Bill (SB) 535, a disadvantaged community includes census tracts receiving the highest 25 percent of overall scores in CalEnviroScreen 4.0. Refer to page 1E-3-52 for more discuss of SB 535 Disadvantaged Communities in Fresno.

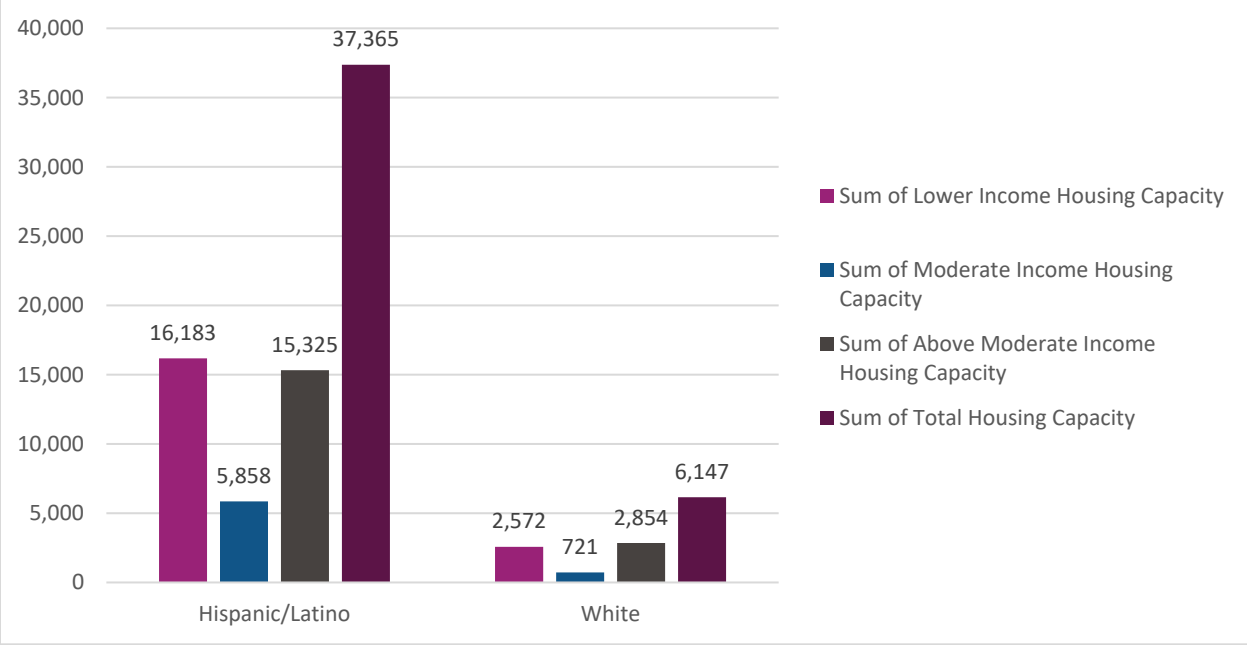
With regards to environmental health conditions, new higher density developments in the Southwest Fresno Specific Plan area could contribute to alleviating some of the existing environmental health issues, creating more sustainable and healthy urban environments. For example, new developments can integrate green infrastructure, such as parks, green roofs, and community gardens, which help improve air quality, manage stormwater, and provide residents with recreational spaces. This can mitigate urban heat island effects and improve overall environmental health. The Southwest Specific Plan, adopted in 2017, reimagines this area as transitioning from industrial to a series of small, complete neighborhoods made up of community-serving uses, including retail, a range of housing types, a school, and a park. In addition, the Southwest Fresno Specific Plan prohibits new industrial development near residential areas in the Specific Plan area to the maximum extent feasible and instead the zoning encourages complete neighborhoods that incorporate mixed-use designs, where residential, commercial, and recreational spaces are within walking distance. This can reduce the need for driving, lowering traffic congestion and vehicle emissions, thus improving air quality. As it transitions from industrial uses to complete neighborhoods, the City recognizes that there are land use incompatibilities that could have negative impacts. For this reason, the City reviewed sites for the Housing Element inventory closely and removed sites that would be most impacted by existing industrial uses in the short term. As the Housing Element is implemented, it will be essential that new developments are planned and executed with a strong focus on environmental and public health to maximize their positive impact.

Potential Effects on Integration Trends

Race and Ethnicity

The population in the city of Fresno is predominantly Hispanic/Latino (50 percent) and White (26 percent). As described previously, neighborhoods north of Shaw Avenue are predominantly White households and neighborhoods south of Shaw, western neighborhoods, and the Downtown/Fulton corridor area are predominantly Hispanic/Latino. **Figure 1E-3.46** displays the housing capacity identified in this Housing Element by the racial/ethnic majority of each census tract. The housing capacity includes approximately 37,365 units in areas that are predominately Hispanic/Latino households (86 percent of the total capacity), and 6,147 units in areas that are predominantly occupied by White households (14 percent). As the established neighborhoods north of Shaw Avenue – including the Woodward Park, Bullard, and Hoover communities – continue to experience growth, there are opportunities for increased diversity with the addition of housing for lower income households. The Housing Element identifies capacity for over 7,500 new housing units in the Woodward Park, Bullard, and Hoover community plan areas for this planning period. About 4,500 of those are identified for lower-income households (see **Table 1E-3.23**). Additional lower-income housing units can provide options to increase housing mobility for lower-income non-White households in R/ECAPs and thereby increase diversity in the neighborhoods north of Shaw Avenue and improve conditions of segregation based on race and ethnicity. The California State University (CSU) Fresno campus is also adjacent to these established neighborhoods, so more development will provide additional housing opportunities for college students and faculty. The additional capacity identified for housing in the rest of the city will not substantially impact trends of integration given the predominance of non-White households throughout the city already.

Figure 1E-3.46: Sum of Total Housing Capacity by Population Majority of Census Tract



Source: City of Fresno, 2023. Data downloaded from HCD AFFH Data and Mapping Tool in 2021, based on ACS data.

Income

As was shown in the assessment above, most neighborhoods are composed of lower- and moderate- income households. In 2020, Fresno's citywide median household income was $53,368. Neighborhoods north of Shaw Avenue, including portions of the Bullard and West community areas, have the highest median incomes. Otherwise, most census block groups in the city have higher rates of poverty with household incomes that fall below the statewide median. As displayed in **Table 1E-3.22** above, the typical income range across many census tracts in the city is less than $50,000 or in the range of $50,001 to $87,100. In fact, 47 percent of census tracts in the city have median incomes below $50,000 and 33 percent have median incomes between $50,000 and $87,100, meaning that in total 81 percent of census tracts have median incomes below the statewide median. Less than 9 percent of census tracts in Fresno have median incomes above $100,000. As shown in **Table 1E-3.24** below, which displays the housing capacity for this Housing Element by 2019 median incomes, about half of the inventoried capacity for new housing (21,939 units) is in neighborhoods with incomes less than $50,000, which mirrors the percentage of census tracts in this income range. **Figure 1E-3.47** shows this information. The distribution is largely due to the capacity for new housing in core activity centers where there is significant capacity for high-density infill housing, but existing household incomes are relatively low. This is followed by an additional 8,297 units in census tracts with incomes between $50,001 and $87,100 (19 percent) and 6,984 units in tracts with incomes between $100,000-$149,999 (16 percent). Relative to the percentage of census tracts in the higher income range, the sites inventory distributes a larger share of units to higher income census tracts relative to the percentage of tracts in this income category. This is reflective of the large number of sites in new growth areas at the periphery of the city with higher median incomes.

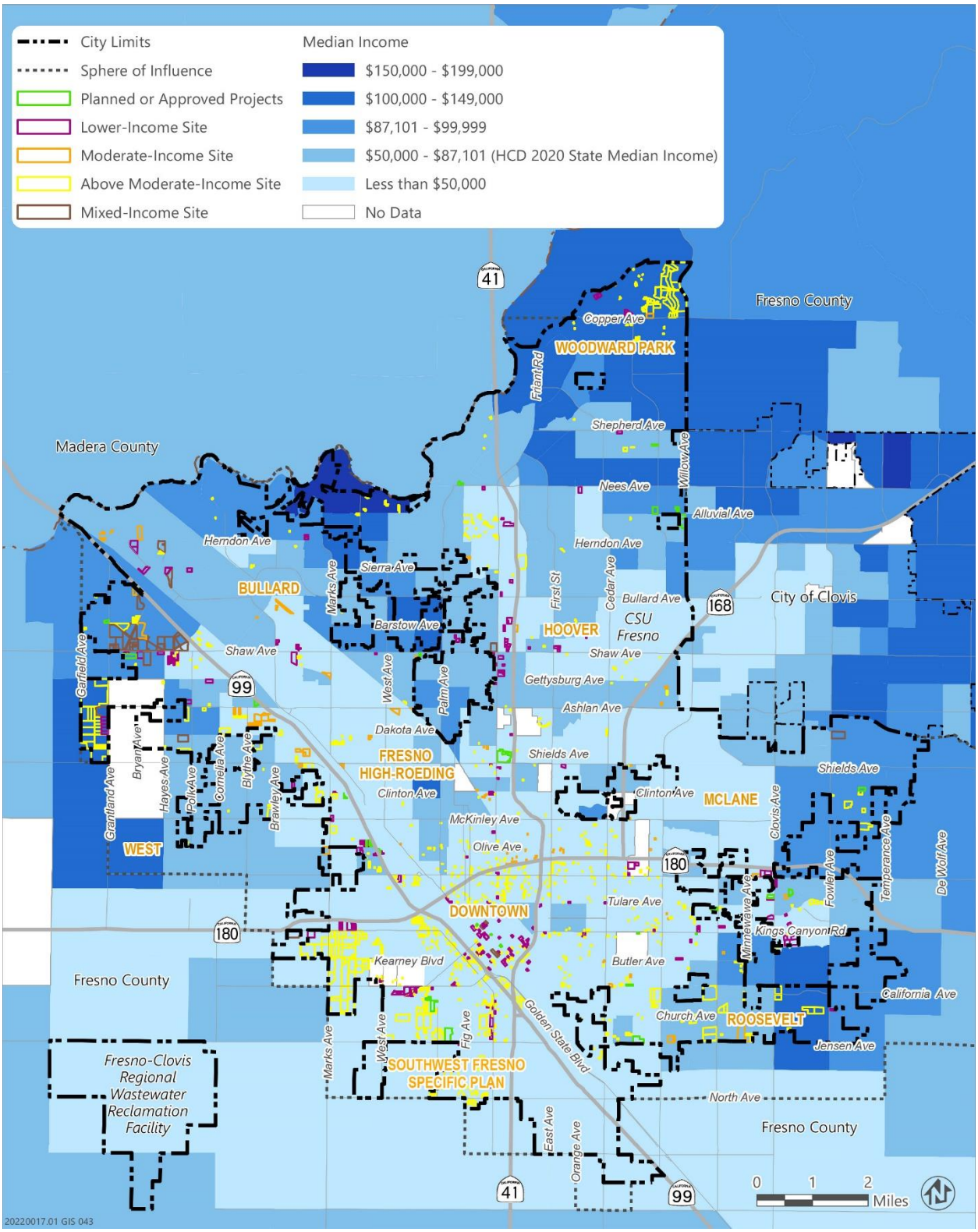
Table 1E-3.24: Housing Capacity and Median Income of Census Tract

	Lower-Income Housing Capacity	Percent of Lower-Income Capacity	Mod-Income Housing Capacity	Percent of Mod-Income Capacity	Above Mod-Income Housing Capacity	Percent of Above Mod-Income Capacity	Total Capacity	Percent of Total Capacity
No Data	47	0.2%	0	0.0%	25	0.1%	72	0.2%
<$50,000	9,954	53.1%	2,464	37.5%	9,521	52.4%	21,939	50.4%
$50,001-$87,100	4,467	23.8%	1,677	25.5%	2,153	11.8%	8,297	19.1%
$87,101-$99,999	2,401	12.8%	2,104	32.0%	1,632	9.0%	6,138	14.1%
$100,000-$149,999	1,818	9.7%	333	5.1%	4,834	26.6%	6,984	16.1%
$150,000-$199,999	68	0.4%	0	0.0%	13	0.	81	0.2%
Total	**18,755**	**100.0%**	**6,579**	**100.0%**	**18,179**	**100.0%**	**43,512**	**100.0%**

Source: City of Fresno, 2023. Data downloaded from HCD AFFH Data and Mapping Tool in 2021, based on ACS data.

Looking more closely at the distribution of sites by income category, the lower-income sites are slightly more concentrated in lower-income census tracts compared to the moderate- and above moderate-income sites. About 53 percent of the lower-income capacity is in census tracts where the median income is below $50,000, compared to 52 percent of the above moderate-income capacity also in these areas, while only 10 percent of the lower-income site capacity is in tracts with median incomes above $100,000, compared to 27 percent of the above moderate-income capacity. The moderate-income capacity is fairly well distributed across census tracts by income. To address this disparity, the Housing Element includes a program to expand capacity for lower-income and missing middle housing types in traditionally single-family neighborhoods and high resource areas, which correspond with areas that are relatively higher income (**Program 2**). To improve economic opportunities, reduce poverty, and increase financial stability, the Housing Element also includes a program to provide targeted job training opportunities for residents (**Program 30**).

Figure 1E-3.47: Housing Capacity and Median Income by Block Group



Source: City of Fresno, 2023. Data downloaded from HCD AFFH Data and Mapping Tool in 2021, based on ACS data.

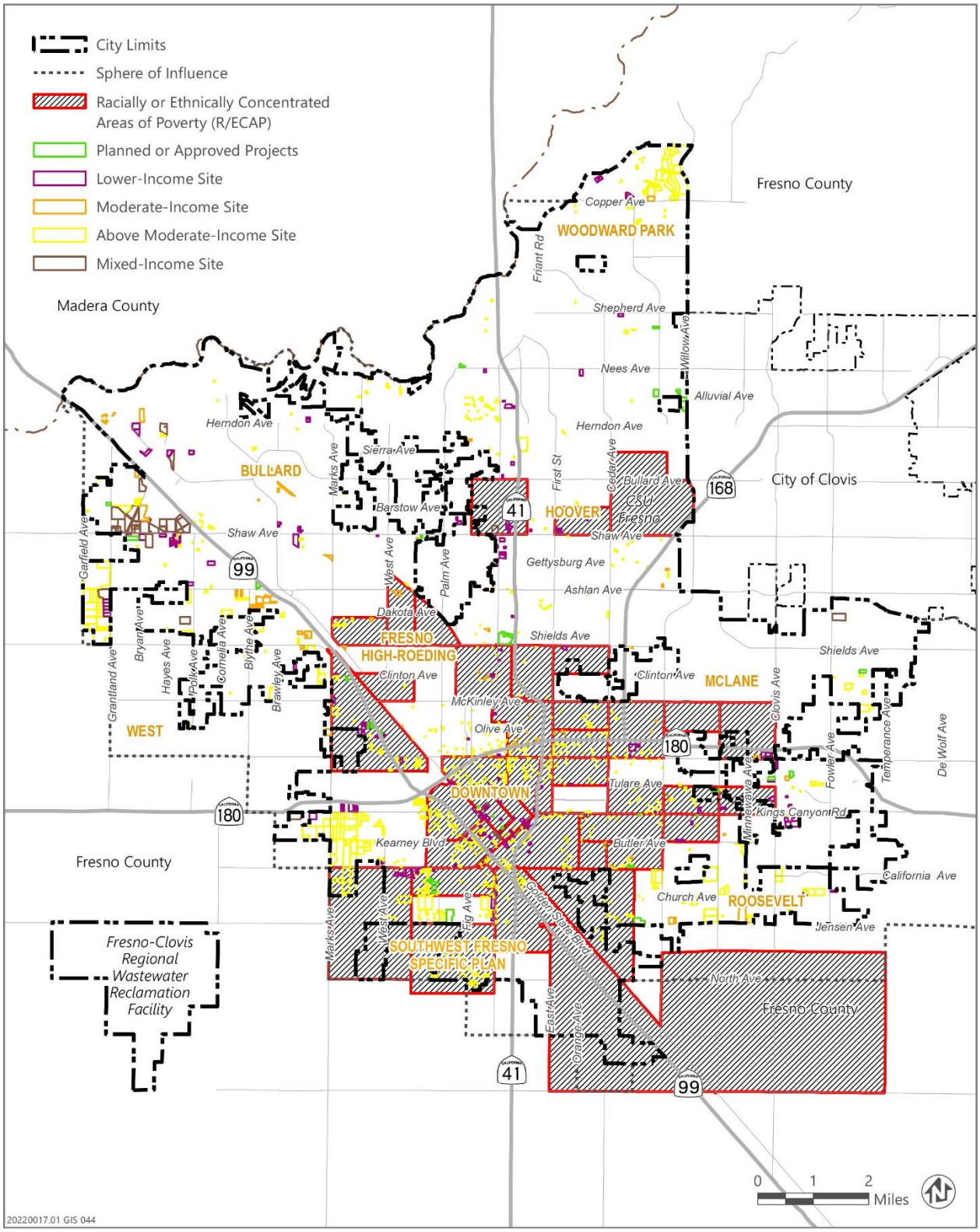
Concentrated Areas of Race and Income

Based on available data using 2009-2013 ACS information, 39 census tracts were designated as R/ECAPs in the city of Fresno, which are neighborhoods where there are both racial concentrations and high poverty rates. As shown in **Figure 1E-4.48**, R/ECAPs are generally in more centralized parts of the city. The Housing Element identifies capacity for 13,410 units in R/ECAP areas, including 7,895 lower-, 1,182 moderate- and 4,333 above-moderate income units (**Figure 1E-3.49**). This accounts for 42 percent of the lower-income capacity, 18 percent of the moderate-income capacity, and 24 percent of the above moderate-income capacity. The reason that a large portion of the lower-income RHNA is accommodated within areas classified as R/ECAPs is because of City policies to encourage high density housing close to the central core of the city in proximity to jobs and transit. **Program 28** (Equitable Community Investments) of this Housing Element, consistent with other policies in the General Plan, prioritizes reinvestment in the city's core areas. It includes the Downtown Neighborhoods Community Plan Area, Phase 1 and Phase 2 Bus Rapid Transit (BRT) and High-Frequency Transit Corridors, Infill Opportunity Zones (IOZs)— which have been defined as established neighborhoods generally south of Herndon Avenue—and the South Industrial Area. These areas align closely with census tracts designated as concentrated areas of poverty. Incentivizing new residential development, expanding transit options, stimulating economic development, and business and job creation will contribute to a higher quality of life for existing and future residents of the city's core areas.

There are 19 census tracts in Fresno that are designated as RCAAs, which are neighborhoods where there are both high concentrations of White households and high household incomes. As shown in **Figure 1E-3.50**, areas of affluence are primarily in areas within the city SOI but located in unincorporated islands or new growth areas north of Nees Avenue. The sites inventory includes capacity for 2,993 housing units in these areas of affluence, as shown in **Figure 1E-3.48**, including capacity for 2,132 above moderate-income units, 256 moderate-income units, and 606 lower-income units. The capacity identified in areas designated as RCAAs is predominantly for above-moderate income units.

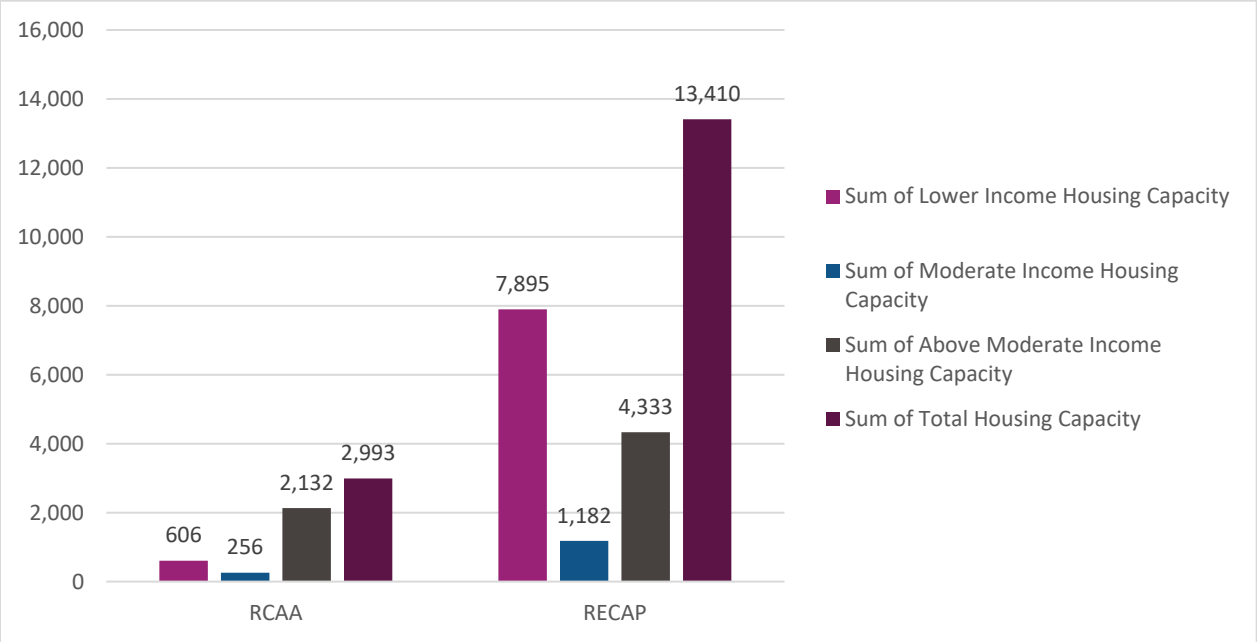
To address the concentration of lower-income unit capacity in R/ECAPs and the lack of lower-income housing opportunity in RCAAs, the Housing Element includes a program to identify additional sites or rezoning options for land in high resource areas to provide opportunities for higher density development in all areas of the city and reduce concentrations of poverty (**Program 2**). This includes developing zoning standards to permit residential conversions in the Office Zone District and facilitating the development of missing middle and multi-unit housing types such as duplexes, triplexes, fourplexes, townhomes, and SB 9 lot splits.

Figure 1E-3.48: Sites Inventory and Racially/Ethnically Concentrated Areas of Poverty (R/ECAP)



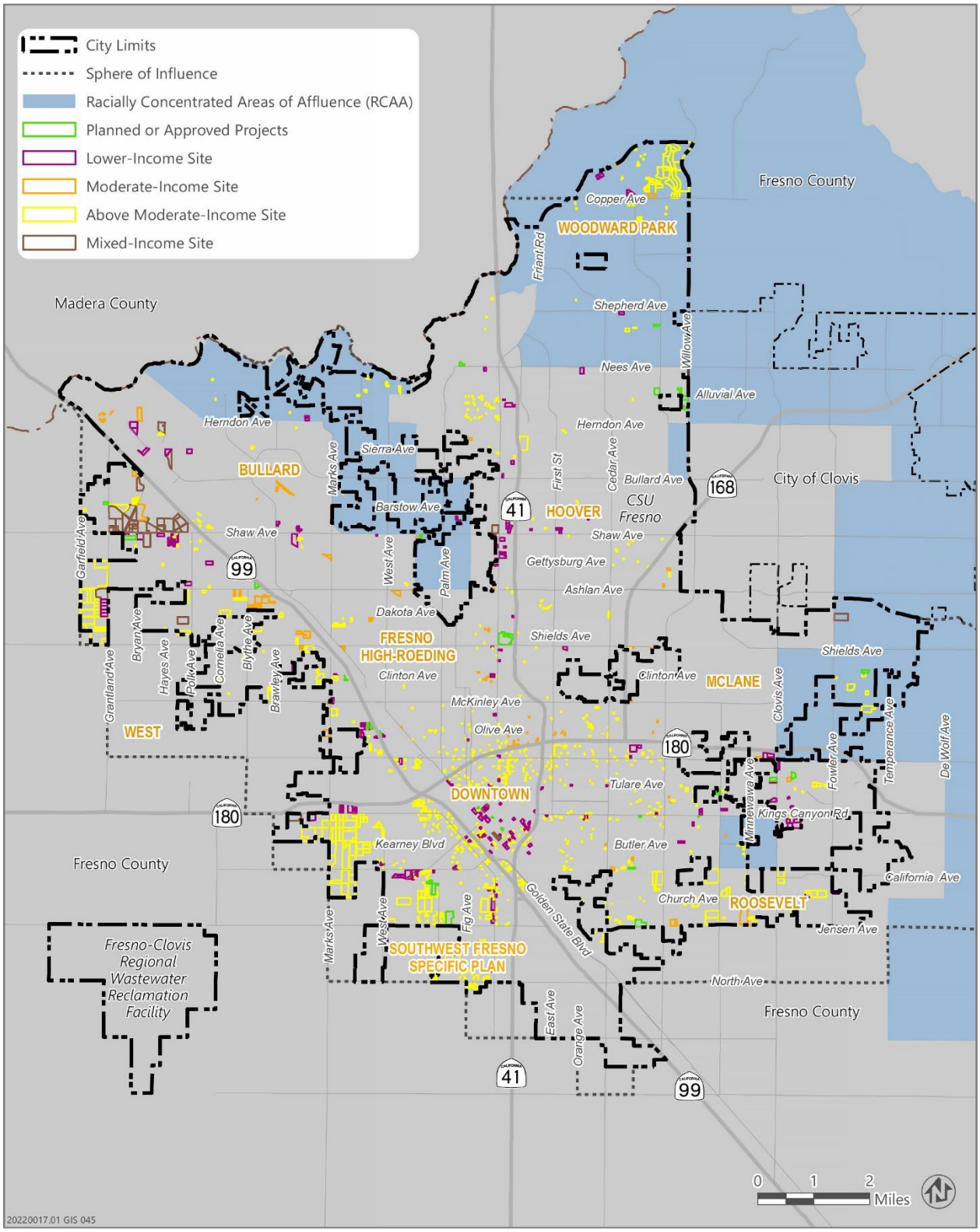
Source: City of Fresno, 2023. Data downloaded from HCD AFFH Data and Mapping Tool in 2021, based on ACS data.

Figure 1E-3.49: Sum of Total Housing Capacity by R/ECAP or RCAA



Source: City of Fresno, 2023. Data downloaded from HCD AFFH Data and Mapping Tool in 2021, based on ACS data.

Figure 1E-3.50: Sites Inventory and Racially Concentrated Areas of Affluence (RCAA)



Source: City of Fresno, 2023. Data downloaded from HCD AFFH Data and Mapping Tool in 2021, based on ACS data.

Potential Effects on Access to Opportunity

Fresno has a mix of low-resource, moderate-resource, and high or highest resources areas. There are also several areas categorized as high segregation and poverty. Growth areas on the periphery of established neighborhoods along the northern and eastern edges of the city are designated moderate and high resource, including an annexation area, designated as highest. The central portion of the city is designated as low resource and high segregation and poverty. **Table 1E-3.25** displays the sum of census tracts in the city SOI by TCAC classification.

Table 1E-3.25: TCAC Opportunity Areas by Census Tract, City of Fresno

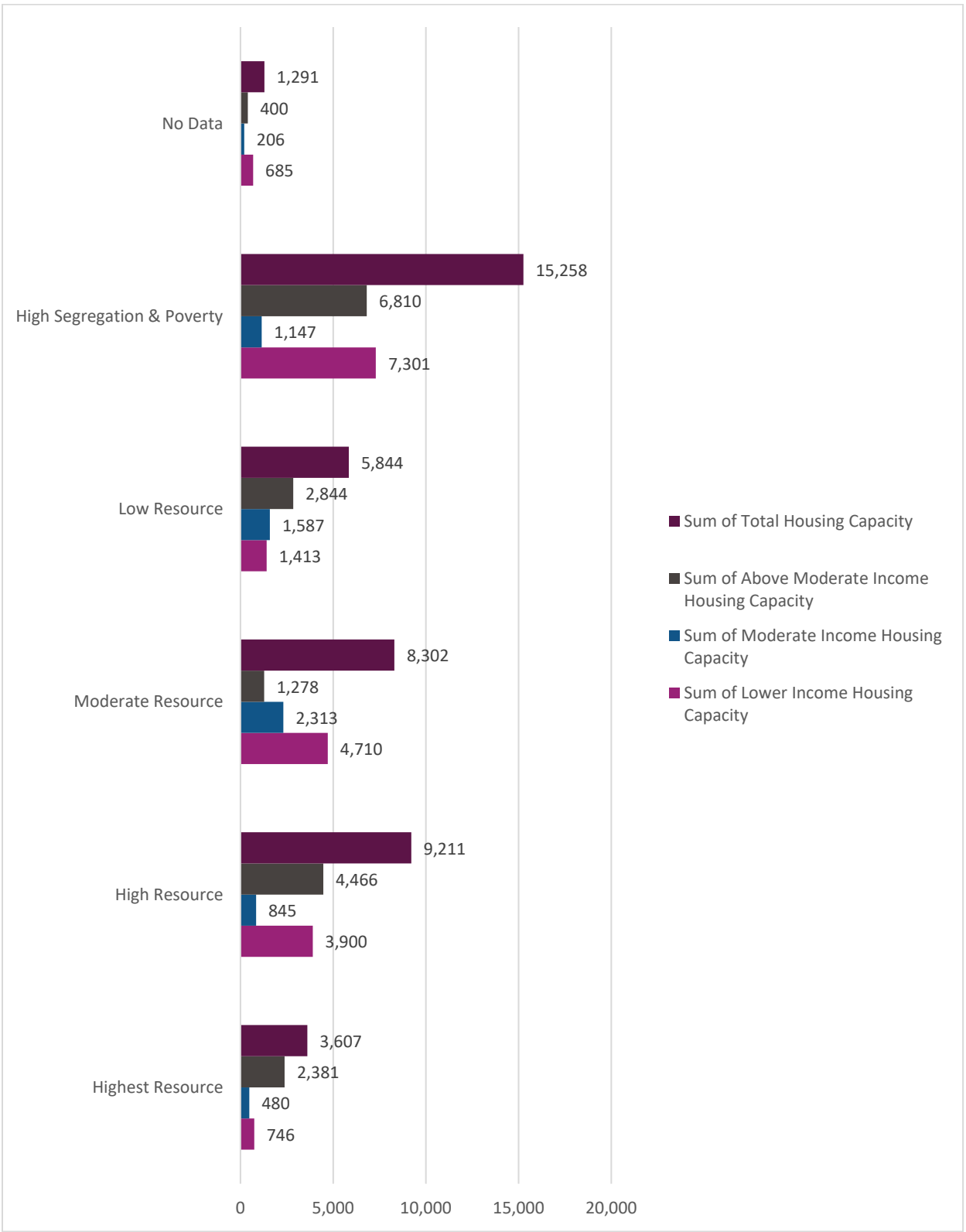
2022 TCAC Opportunity Area	Sum of Census Tracts in City SOI	Percent of Tracts
Highest Resource	24	17.8%
High Resource	29	21.5%
Moderate Resource	23	17.0%
Low Resource	15	11.1%
High Segregation and Poverty	43	31.9%
No Data	1	0.7%
Total	**135**	**100.0%**

Source: City of Fresno, 2023. California Tax Credit Allocation Committee (CTAC), 2022.

Figure 1E-3.51 below estimates the number of housing units in each opportunity area. Generally, the sites inventory adds more housing in all resource areas. The most housing capacity is estimated in high or highest resource areas and areas of high segregation and poverty, which is consistent with the bulk of developable areas in Fresno (see **Figure 1E-3.52**). In total, the inventory includes capacity for approximately 12,818 units in high or highest resource areas (29 percent of the total capacity), 8,302 units in moderate resource areas (19 percent of the total capacity), 5,844 units in low resource areas (13 percent of the total capacity), and approximately 15,258 units in areas of high segregation and poverty (35 percent of the total capacity). One census tract (census tract 1.00 in the Downtown development area) does not have any data associated with it from the TCAC/HCD Opportunity Mapping tool, and this accounts for 1,291 units from the Housing Element inventory (3 percent of the total capacity).

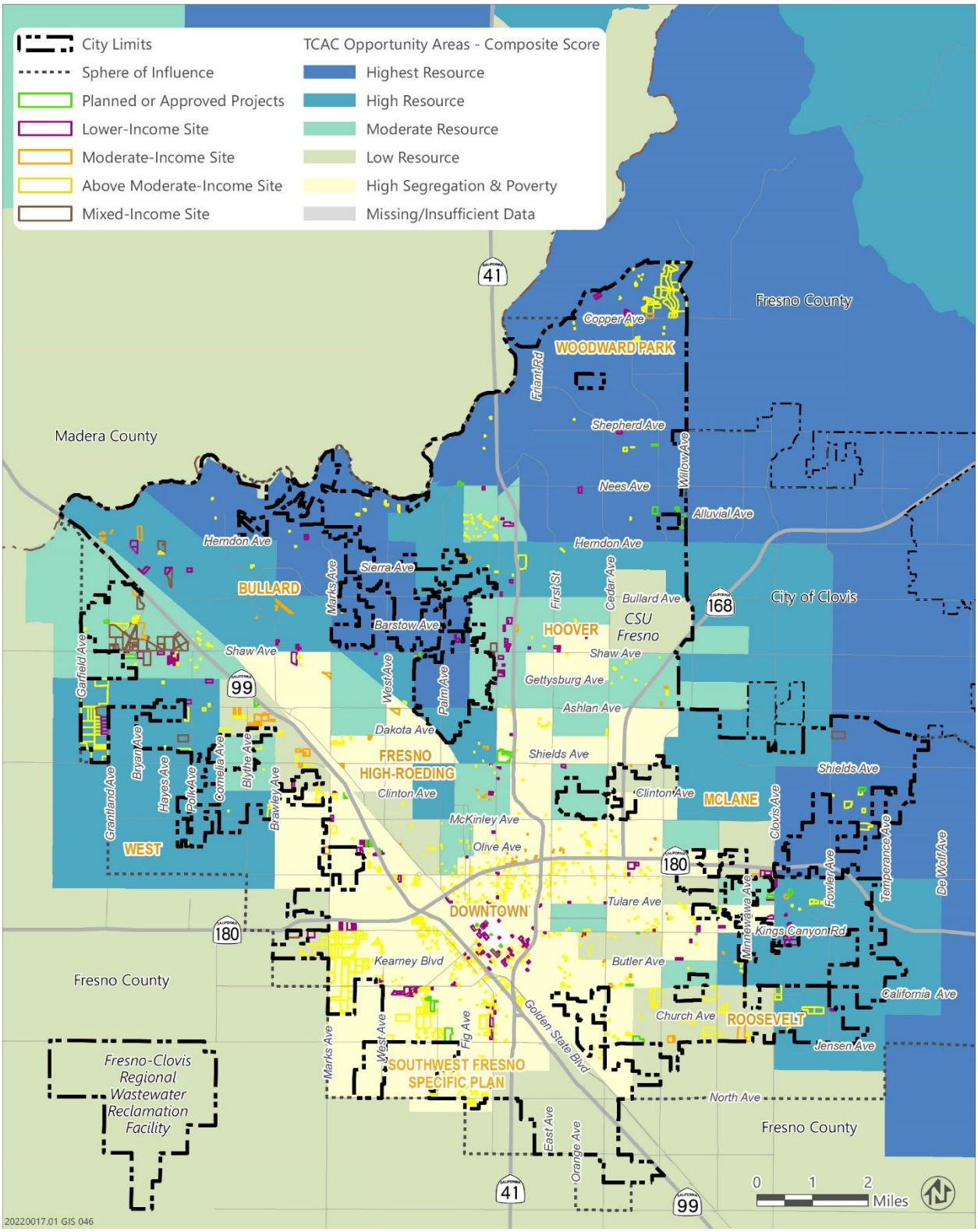
Over half of the above moderate-income housing capacity (53 percent) is in low resource areas and areas of high segregation and poverty, combined, creating opportunities to balance the concentration of poverty in these areas of the city with higher income households. Conversely, about 25 percent of the lower-income housing capacity is in high and highest resource areas, compared to 38 percent of the above moderate-income housing capacity. This is largely due to the predominance of single-family zoning in neighborhoods north of Shaw Avenue. **Program 2,** described above, has been added to the Housing Element to address this disparity by expanding opportunities for lower- and moderate-income housing in high and highest resource areas.

Figure 1E-3.51: Sum of Total Housing Capacity and TCAC Opportunity Areas



Source: City of Fresno, 2023. Data downloaded from HCD AFFH Data and Mapping Tool in 2021, based on ACS data.

Figure 1E-3.52: Sites Inventory and TCAC Opportunity Areas



Source: City of Fresno, 2023. Data downloaded from HCD AFFH Data and Mapping Tool in 2021, based on ACS data.

Potential Effects on Disproportionate Housing Needs

Cost Burden or Overpayment

Across all census tracts, the average percent of housing cost burdened populations is between 40 and 60 percent for renters and 20 to 40 percent for homeowners. **Table 1E-3.26** and **Table 1E-3.27** below display where housing capacity exists relative to housing cost burden. Approximately 25,336 units (58 percent) of the housing capacity is identified in tracts with a renter overpayment between 40 and 60 percent; 8,852 units (20 percent) of the capacity is in tracts with rates between 60 and 80 percent; and 8,989 units (21 percent) are in tracts with rates above 80 percent. The majority of capacity for lower income units (63 percent) is within census tracts where 40 to 60 percent of renters are overpaying for housing, primarily located in southwest, southeast, west, and central Fresno. The capacity for lower income households in these areas can facilitate housing mobility opportunities for renters who need more affordable options to avoid displacement and homelessness. With regards to overpayment for homeowners, more than half (55 percent) of the capacity in the inventory is in areas where 20 to 40 percent of homeowners are overpaying for housing. As shown in **Table 1E-3.27**, this includes 9,360 lower-income units, 3,283 moderate-income units, and 11,403 above moderate-income units. The addition of these units could help to alleviate existing overpayment by offering lower- and moderate-income units to current and future residents where there is need and increasing the housing stock overall to alleviate the demand on an existing shortage of housing at affordable price points. Additionally, the site capacity and distribution of units by income category can facilitate mobility opportunities for all households.

Table 1E-3.26: Housing Capacity by Percent of Renter Overpayment

	Sum of Lower Income Housing Capacity	Percent of Lower Income Capacity	Sum of Moderate Income-Housing Capacity	Percent of Moderate Income Capacity	Sum of Above Moderate-Income Housing Capacity	Percent of Above Moderate Income Capacity	Total Capacity	Percent of Total Capacity
<20%	0	0.0%	8	0.1%	9	0.0%	17	0.0%
20%-40%	0	0.0%	0	0.0%	318	1.7%	318	0.7%
40%-60%	11,791	62.9%	3,182	48.4%	10,362	57.0%	25,336	58.2%
60%-80%	4,144	22.1%	1,207	18.3%	3,501	19.3%	8,852	20.3%
>80%	2,820	15.0%	2,181	33.2%	3,988	21.9%	8,989	20.7%
Total	**18,755**	**100.0%**	**6,579**	**100.0%**	**18,179**	**100.0%**	**43,512**	**100.0%**

Source: City of Fresno, 2023. Data downloaded from HCD AFFH Data and Mapping Tool in 2021, based on ACS data.

Table 1E-3.27: Housing Capacity by Percent of Homeowner Overpayment

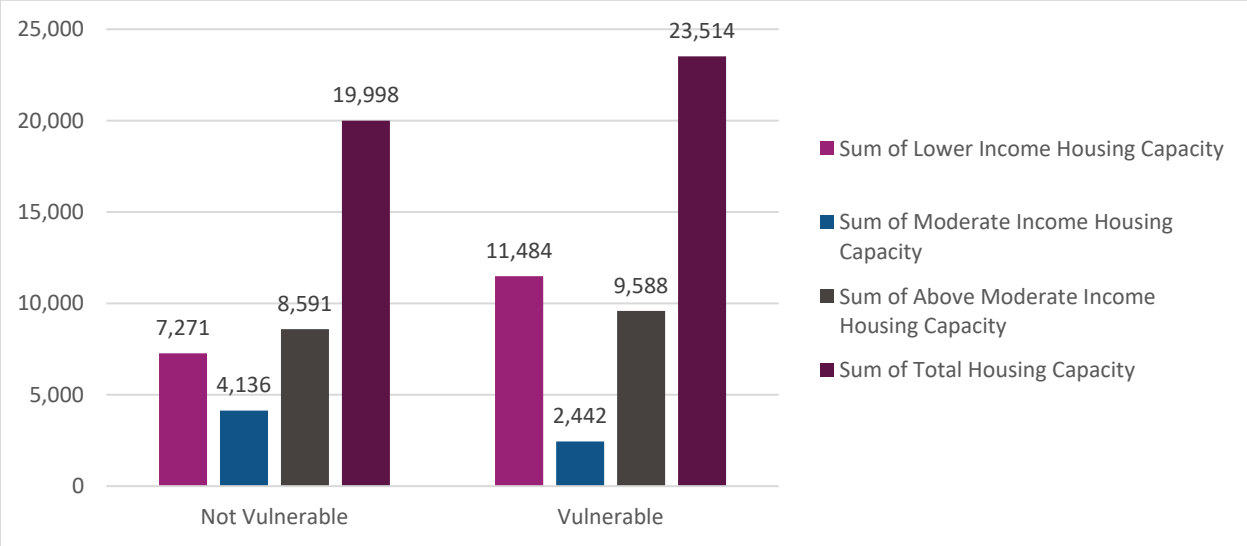
	Sum of Lower Income Housing Capacity	Percent of Lower Income Capacity	Sum of Moderate Income-Housing Capacity	Percent of Moderate Income Capacity	Sum of Above Moderate -Income Housing Capacity	Percent of Above Moderate Income Capacity	Total Capacity	Percent of Total Capacity
<20%	2,141	11.4%	237	3.6%	679	3.7%	3,057	7.0%
20%-40%	9,360	49.9%	3,283	49.9%	11,403	62.7%	24,046	55.3%
40%-60%	3,423	18.3%	2,337	35.5%	1,943	10.7%	7,702	17.7%
60%-80%	3,145	16.8%	515	7.8%	3,755	20.7%	7,415	17.0%
>80%	685	3.7%	206	3.1%	400	2.2%	1,291	3.0%
Total	**18,755**	**100.0%**	**6,579**	**100.0%**	**18,179**	**100.0%**	**43,512**	**100.0%**

Source: City of Fresno, 2023. Data downloaded from HCD AFFH Data and Mapping Tool in 2021, based on ACS data.

Displacement

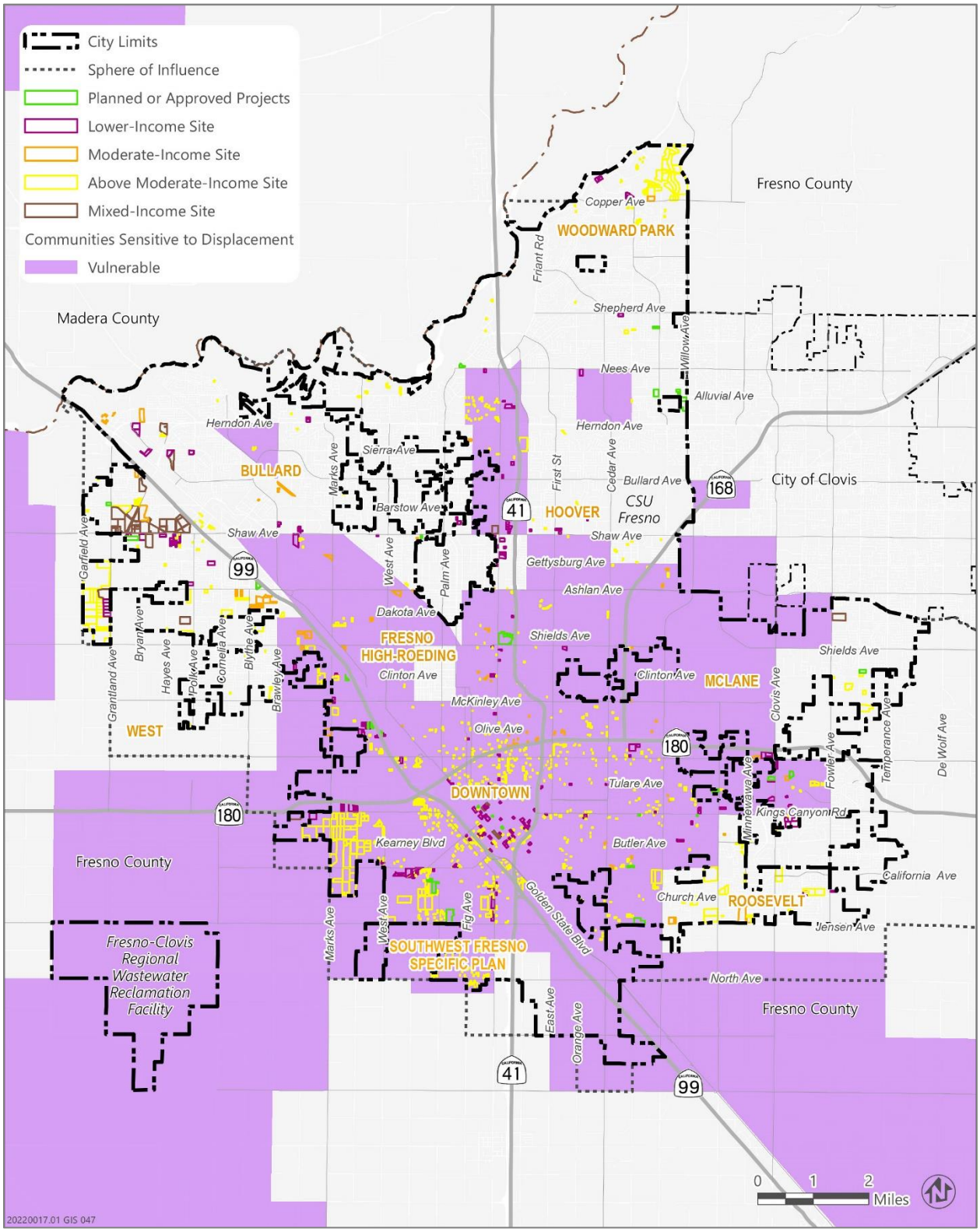
As described above, a substantial amount of the city land area is vulnerable to displacement pressure using the methodology from UC Berkeley's Urban Displacement Project. There are 77 census tracts in the city that are considered susceptible to displacement risk, making up more than half of the city (57 percent). **Figures 1E-3.53** and **1E-3.54** below display the quantity and location of the sites inventory capacity relative to displacement risk in Fresno. The inventory provides a substantial capacity for new housing in areas identified as vulnerable. This includes capacity for 11,484 lower income units and 9,588 above-moderate income units in areas that are susceptible to displacement. Although the addition of lower-income housing should alleviate some of the pressures of displacement, the Action Plan also includes **Program 34** – Eviction Protection Program to protect tenants from eviction and displacement pressures.

Figure 1E-3.53: Sum of Housing Capacity and Areas at Risk of Displacement



Source: City of Fresno, 2023. Data downloaded from HCD AFFH Data and Mapping Tool in 2021, based on data and methodology from the Urban Displacement Project.

Figure 1E-3.54: Sites Inventory and Areas at Risk of Displacement



Source: City of Fresno, 2023. Data downloaded from HCD AFFH Data and Mapping Tool in 2021, based on data and methodology from the Urban Displacement Project.

Fair Housing Issues, Contributing Factors, Meaningful Actions

HCD defines a fair housing issue as "a condition in a geographic area of analysis that restricts fair housing choice or access to opportunity, which includes such conditions as ongoing local or regional segregation or lack of integration, racially or ethnically concentrated areas of poverty and affluence, significant disparities in access to opportunity, disproportionate housing needs, and evidence of discrimination or violations of civil rights law or regulations related to housing." In Fresno, there are substantial barriers to homeownership especially for communities of color and lower income households as denoted by lower income households, POC households, and individuals living below the poverty line concentrated in south and west neighborhoods in the city. Fresno has concentrated areas of poverty and many of these same census tracts have been identified as R/ECAPs or designated as "Low Resource" or "High Segregation & Poverty" by the HCD/TCAC Opportunity mapping methodology. In addition, most of the city is considered vulnerable to displacement from housing market pressures and poor environmental quality, or impacts from extreme heat and climate change. Pursuant to Government Code Section 65583 (c)(10)(A)(v), the Housing Element includes several policies and programs to work towards addressing fair housing issues and replacing segregated living patterns with integrated and balanced communities. **Table 1E-3.28** below summarizes the fair housing issues, contributing factors, and implementation programs included in the Housing Element to affirmatively further fair housing in the city of Fresno. For more details on the actions in each implementation program, refer to Section 1E-1: Action Plan.

Table 1E-3.28: Summary of Fair Housing Issues, Contributing Factors, and Meaningful Actions to AFFH, City of Fresno

Identified Fair Housing Issue	Contributing Factor	Priority Level	Meaningful Action
Segregation based on race and income; and presence of Racially and Ethnically Concentrated Areas of Poverty (R/ECAPs) and Racially and Ethnically Concentrated Areas of Affluence (RCAAs)	Past land use and zoning practices favoring outward expansion and resulting in subsequent disinvestment in core, south, and west neighborhoods	High	**Program 2** – Variety of Housing Opportunities in High Resource Areas **Program 3** – Encourage and Facilitate Accessory Dwelling Units and Small Homes **Program 11** – Incentives for Housing Development **Program 20** – Housing Choice Voucher Incentive Program
	Public housing and other forms of affordable housing are limited by location and type	High	**Program 11** – Incentives for Housing Development **Program 12** – Local Housing Trust Fund **Program 14** – Partnerships with Affordable Housing Developers **Program 18** - Mixed Income Neighborhood Trust (MINT)

Identified Fair Housing Issue	Contributing Factor	Priority Level	Meaningful Action
Unequal Access to Opportunity including Access to Safe and Healthy Environments, Reliable Public Transit, and Access to Education	Lack of lower- and moderate-income capacity in high and highest resource areas	High	**Program 2** – Variety of Housing Opportunities in High Resource Areas **Program 3** – Encourage and Facilitate Accessory Dwelling Units and Small Homes **Program 11** – Incentives for Housing Development **Program 20** – Housing Choice Voucher Incentive Program
	Continued need for reinvestment in low-and moderate- income census tracts	High	**Program 28** – Equitable Community Investments
	Disparities in access to healthy environments based on location of residence	High	**Program 27** – Environmental Justice **Program 28** – Equitable Community Investments
Disproportionate Housing Needs and Elevated Displacement Risk, Particularly for Lower Income Households	Rising housing costs without effective tenant protections to ensure stable housing (including for mobile homes) and prevalence of sensitive communities due to economic pressures, market, and environmental hazards/ climate change conditions	High	**Program 16** – Community Land Trust **Program 18** - Mixed Income Neighborhood Trust (MINT) **Program 22** – Housing Rehabilitation **Program 32** – Opportunity to Purchase Act **Program 33** – Mobile Home Parks **Program 34** – Eviction Protection Program
	Rising incidence of homelessness	High	**Program 36** – Homeless Assistance
Barriers to Homeownership for Black and Indigenous People of Color (BIPOC) communities	Past land use and zoning practices including redlining, racial covenants, and urban renewal projects have created systemic disparities to access homeownership	Medium	**Program 19** – Home Buyer Assistance
	Difficult to find rental housing that is accessible	Medium	**Program 24** – Special Needs Housing
	Stakeholder input and data on housing discrimination complaint calls and filings indicate that more fair housing education is needed for landlords, lenders, and the general public	Medium	**Program 20** – Housing Choice Voucher Incentive Program **Program 26** – Fair Housing Services

Source: City of Fresno and Ascent, November 2023.

SECTION 1E-4: CONSTRAINTS

Land Use Controls

Analysis

General Plan

The Fresno General Plan sets forth policies that guide new development, including new residential development. As described in the Urban Form, Land Use, and Design Element, growth in the City of Fresno over the past few decades has traditionally been low density suburban style development, which has resulted in conditions of sprawl in various areas of the city. With the adoption of an updated General Plan in 2014, the City shifted emphasis to encourage more balanced development patterns between low density suburban growth and higher density urban development to establish complete communities through the following: infill, rehabilitation, Downtown and neighborhood revitalization, transit-oriented development along major streets, and mixed-uses in growth areas. **Table 1E-4.1** summarizes the General Plan land use designations within the city that allow residential uses and corresponding zoning districts from the Development Code, as well as their permitted net densities (without application of a density bonus).

Table 1E-4.1: Fresno General Plan Land Use Designations

General Plan Designation	Minimum Density (DU per acre)	Maximum Density (DU per acre)	Maximum Floor Area Ratio (non-residential only)	Development Code Zoning District
Buffer	--	0.05 (1 unit per 20 net acres)	--	(B) Buffer
Low Density Residential	1 unit per 5 acres	3.5	--	(RE) Residential Estate (RS-1) Residential Single Family, Extremely Low Density (RS-2) Residential Single Family, Very Low Density (RS-3) Residential Single Family, Low Density
Medium Low Density Residential	3.5	6	--	(RS-4) Residential Single Family, Medium Low Density
Medium Density Residential	5	12	--	(RS-5) Residential Single Family, Medium Density
Medium High Density Residential	12	16	--	(RM-MH) Mobile Home Park (RM-1) Residential Multi-Family Medium High Density
Urban Neighborhood Density	16	30	--	(RM-2) Residential Multi-Family, Urban Neighborhood
High Density Residential	30	45	--	(RM-3) Residential Multi-Family, High Density

General Plan Designation	Minimum Density (DU per acre)	Maximum Density (DU per acre)	Maximum Floor Area Ratio (non-residential only)	Development Code Zoning District
Neighborhood Mixed Use	12	No Limit	1.5	(NMX) Neighborhood Mixed Use
Corridor/Center Mixed Use	16	No Limit	1.5	(CMX) Corridor/Center Mixed Use
Regional Mixed Use	30	No Limit	2.0	(RMX) Regional Mixed Use
Downtown Neighborhood	--	No Limit	No Limit	(DTN) Downtown Neighborhood
Downtown General	--	No Limit	No Limit	(DTG) Downtown General
Downtown Core	--	No Limit	No Limit	(DTC) Downtown Core

DU= Dwelling Unit

Source: Fresno General Plan, Urban Form, Land Use, and Design Element; Table 3-1.

Zoning and Development Code

The City's Development Code provides for the following districts to permit residential uses including the Buffer[1] designation, six single-family districts, four multi-family districts, three mixed-use districts, three downtown districts, and two commercial districts. These districts are designed to implement the General Plan vision for new infill and redevelopment, transit-oriented development along major streets, and new Activity Centers with mixed-uses and neighborhoods in growth areas.

- **Residential Single-Family Districts** (RE, RS-1, RS-2, RS-3, RS-4, RS-5**)** -- The Residential zones are intended to provide specific areas in the city where residential developments of varying densities may be developed as specified in the land use element of the General Plan.
- **Residential Multi-Family Districts** (RM-1, RM-2, RM-3, RM-MH**)** -- The purpose of the Residential Multi-Family (RM) Districts are to provide opportunities for the development of higher-density and affordable housing in neighborhoods throughout the city implementing regulations for "Medium High Density Residential," "Urban Neighborhood Density Residential," and "High Density Residential" General Plan classifications.

[1] The Buffer land use designation in the City of Fresno General Plan, Urban Form, Land Use, and Design Element is intended to separate urban uses from long-term agricultural uses in order to preserve long-term viable agricultural areas and intensive farming operations adjoining but outside the Planning Area.

- **NMX Neighborhood Mixed-Use** -- The NMX district is intended to provide for mixed-use residential districts that include local-serving, pedestrian-oriented commercial development, such as smaller independent retail shops and professional offices in two- to three-story buildings. Development is expected to include ground-floor neighborhood retail uses and upper-level housing or offices, with a mix of small lot single-family houses, townhomes, and multi-family dwelling units on side streets, in a horizontal or vertical mixed-use orientation. The maximum FAR for non-residential development is 1.5.[2]
- **CMX Corridor/Center Mixed-Use** -- The CMX district is intended to allow for either horizontal or vertical mixed-use development along key circulation corridors in the city where height and density can be easily accommodated. Ground-floor retail and upper-floor residential or offices are the primary uses, with residential uses, personal and business services, and public and institutional space as supportive uses. The maximum FAR for non-residential development is 1.5.
- **RMX Regional Mixed-Use** -- The RMX district is intended to support regional retail and mixed-use development in large-scale activity centers outside of Downtown, as identified by the General Plan. It accommodates urban-scale mixed-use development that serve residents and businesses of the region at large. Medium-scale retail, housing, office, civic and entertainment uses, and shopping malls with large-format or "big-box" retail are allowed, as are supporting uses such as gas stations, hotels, and residential in mixed-use or single-use buildings. The maximum FAR for non-residential development is 2.0
- **DTN Downtown Neighborhood** -- The DTN District is intended to create walkable, mixed-use urban neighborhoods surrounding the Downtown Core.
- **DTG Downtown General** -- The DTG District is intended to support a high concentration of regional activity generators such as governmental buildings and convention centers within a pedestrian-oriented, mixed-use urban setting.
- **DTC Downtown Core** -- The DTC District will foster the enhancement of Fresno's business, shopping, and cultural heart by guiding the development of the densest, most active, and most interesting mixed-use urban center in the region.
- **CMS Commercial - Main Street** -- The CMS district is intended to preserve or promote small-scale, fine-grain commercial development in neighborhoods where single-family residential and townhomes are predominant. A traditional "Main Street" character is achieved with active storefronts, outdoor seating and pedestrian-oriented design.

[2] Per Zoning Code Section 15-309 (Determining Floor Area Ratio), “Floor area ratio (FAR) is the measure of the intensity of non-residential development. It is the ratio of the non-residential floor area, excluding the areas described below, of all principal and accessory buildings on a site to the site area. To calculate FAR, non-residential floor area is divided by site area, and typically expressed as a decimal. For example, if the non-residential floor area of all buildings on a site totals 20,000 square feet, and the site area is 10,000 square feet, the FAR is expressed as 2.0.”

- **CR Commercial – Regional --** The CR district is intended to meet local and regional retail demand, such as large-scale retail, office, civic and entertainment uses, shopping malls with large-format or "big-box" retail, and supporting uses such as gas stations and hotels. Buildings are typically larger-footprint and urban-scaled. Development and design standards will create a pedestrian-orientation within centers and along major corridors, with parking generally on the side or rear of major buildings, but automobile-oriented uses also will be accommodated on identified streets and frontages.

Downtown Development Code

The Downtown Development Code (DDC) is a form-based code that contains most of the standards and requirements for development and land use activity within the Downtown Neighborhoods Community Plan and Fulton Corridor Specific Plan areas. Regulations regarding development patterns are generally consistent with the existing scale and character of the plan areas' various neighborhoods districts and corridors. Form-based codes address the relationship between building facades and the public realm (streets and parks), the form and massing of buildings in relation to one another, and the scale and types of streets and blocks. The City incorporated the DDC into the Citywide Development Code in 2016 and implements these form-based standards through the DTN, DTC, and DTG zoning district standards.

Residential Development Standards

Table 1E-4.2 lists the zoning districts from the City of Fresno Development Code that allow residential development and describes the development standards for residential projects. Zoning regulations are designed to implement the policies of the City's General Plan and protect and promote health, safety, and general welfare of residents. The Code sets forth the City's specific residential development standards to preserve the character and integrity of existing neighborhoods and at the same time offer flexibility in providing a wide range of residential opportunities and dwelling unit types. The section below provides an overview of primary development standards that affect the maximum development intensity of a housing project, including density, height, setbacks, parking, and open space requirements.

To accelerate housing production in infill areas and incentivize investment along the City's transit and mixed-use corridors, the City adopted amendments to: (1) remove maximum density limitations in the Mixed Use Districts and (2) modify the restriction that prohibits ground floor residential uses in mixed-use districts so that only corner properties along arterials with Bus Rapid Transit (BRT) stops will have mandated commercial uses. With those amendments, the City now relies on height limits rather than regulating density. This action was intended to encourage higher density development in mixed-use districts.

Prior to adoption, the City performed an analysis of a typical development project comparing the existing density limits with the new height-based limits to determine how this change could affect project buildouts. For the purpose of the environmental analysis, consultants analyzed 10 parcels (2 within each district) and applied the applicable development standards for the corresponding zone district to create conceptual site plans. It was determined that the following are reasonable densities that would be developed based on typical multi-family and mixed-use developments built in Fresno:

- **CMS:** 48 dwelling units per acre
- **CMX:** 75 dwelling units per acre
- **CR:** 80 dwelling units per acre
- **NMX:** 64 dwelling units per acre
- **RMX:** 90 dwelling units per acre

Table 1E-4.2: City of Fresno Development Standards by Zoning District

Zoning District	Max. Height	Min. Lot Width	Minimum Yard Setback			Min. Lot Area	Density (DU per Acre)	Max. Floor Area Ratio (FAR) (non-residential only)	Max. Lot Coverage	Permitted Uses
			Front	Side	Rear					
Buffer (B) District										
B	35	130	35	20-35	20	26,000	1	-	5%	SF/MF*
Residential Single Family (RS) Districts										
RE	35	80-160	35	10-35	20	5 acres	0.2	-	30%	SF*
RS-1	35	80-160	35	10-25	20	36,000	1.2	-	30%	SF*
RS-2	35	80-130	30	10-25	20	20,000	2.2	-	30%	SF*
RS-3	35	60-90	25	5-20	20	9,000	0.2-3.5	-	35%	SF*
RS-4	35	40-70	13	4-10	10	5,000	3.5-6	-	50%	SF*
RS-5	35	30-60	13	3-10	10	4,000	5-12	-	60%	SF/MF*
Residential Multi-Family (RM) Districts										
RM-1	40	--	10-20	10-15	20	--	12-16	-	50%	SF/MF*
RM-2	50	--	10-20	10-15	15	--	16-30	-	50%	MF*
RM-3	60	--	10-20	10-15	15	--	30-45	-	60%	MF*
RM-MH	35	--	10-20	10-15	10	--	12-16	-	50%	MF*
Mixed-Use (MX) Districts										
NMX	40	--	-/10	--	--	--	Min. Density – 12 du/ac No Max. Density	1.5	--	SF/MF*
CMX	60	--	-/10	--	--	--	Min. Density – 16 du/ac No Max. Density	1.5	--	SF/MF*
RMX	75	--	-/10	--	--	--	Minimum Density – 30 du/ac No Maximum Density	2.0	--	SF/MF*

Zoning District	Max. Height	Min. Lot Width	Minimum Yard Setback			Min. Lot Area	Density (DU per Acre)	Max. Floor Area Ratio (FAR) (non-residential only)	Max. Lot Coverage	Permitted Uses
			Front	Side	Rear					
Commercial (C) Districts Allowing Residential Development										
CMS	35	--	0	0	0	--	No Limit	1.0	--	SF/MF*
CR	75	100	15	0	0	10,000	No Limit	1.0	--	SF/MF*
Downtown (DT) Districts										
DTN	90	--	2-10	0-10	0	--	No Limit	No Limit	--	SF/MF*
DTG	140	--	2-10 (1)	0-10 (2)	0	--	No Limit	No Limit	--	SF/MF*
DTC	190	--	2-10	0-10	0	--	No Limit	No Limit	--	SF/MF*

Notes: Densities in the Residential Single-Family Districts are based on corresponding land use designation in the Fresno General Plan. For Mixed Use zones, minimum residential density is not required for projects on lots less than 20,000 sq. ft. in area or projects further than 1,000 feet from a planned or existing BRT route. For mixed-use and commercial districts, all permitted uses are allowed either alone or in combination with other permitted uses unless otherwise stated.

Specific Limitations:

[1] Front setback along Mariposa Street between M Street and P Street (min./max.): 10/18 ft.

[2] Street Side setback along Mariposa Street between M Street and P Street (min./max.): 10/15 ft.

**See Development Code for more information.*

Source: City of Fresno Development Code, 2022.

The environmental assessment prepared for the projects estimated that there are approximately 791 acres of mixed-use zoned property that has the potential to be developed in the next few decades. These 791 acres consist of land that is considered vacant and underutilized and includes parcels that have an existing land use of 'vacant,' 'parking,' or 'open space/ag' per City of Fresno Existing Land Use layer. Based on this acreage and the reasonable densities identified above, the potential development of residential units that could result from the amendment would be 60,880 units, as compared to the previous 20,434-unit capacity (see **Table 1E-4.3**).

Table 1E-4.3: Summary of Mixed-Use Density Increases

Zone Districts	Acres	Previously Allowed Density		Achievable Density under New Standards	
		DU/AC	Units	DU/AC	Units
CMS	10	16	165	48	495
CMX	320	30	9,590	75	23,975
CR	248	16	3,966	80	19,830
NMX	99	16	1,577	64	6,308
RMX	114	45	5,136	90	10,272
Total	**791**	**-**	**20,434**	**-**	**60,880**

Note: The numbers are rounded to the nearest whole number.

Source: City of Fresno Mitigated Negative Declaration for General Plan Amendment/Development Code Text Amendment Application No. P22-02413 Environmental Assessment. August 2022.

As mentioned above, the text amendment revised the restriction that prohibits ground floor residential uses in mixed-use districts so that only corner properties along arterials with BRT stops will have mandated commercial uses. Other high-activity uses may be approved at the discretion of the Review Authority. However, this does not impose a constraint on housing development in these areas because larger multi-family developments can be activated with active ground floor additions or a residential lobby.

Lot Sizes

Density in single-family zones is driven by the minimum lot area requirements. The lot size requirements in single family zones typically reflect the development pattern of the surrounding subdivision. Lot sizes range from a minimum of 5 acres in the RE zone, 36,000 square feet in the RS-1 zone, and 4,000 square feet in the RS-5 zone. There are no minimum lot area requirements for multi-family and mixed-use zones except in the CR district, where the minimum lot area is 10,000 square feet.

Per State law, local governments may not impose minimum lot size requirements on accessory dwelling units (ADUs) (referred to as second units in the Fresno Development Code) since these development types are not required to observe minimum lot size requirements for the underlying zoning district. Currently (2022), the City states the following minimum lot sizes for these units: 6,200 square feet for second dwelling units, 6,000 square feet for an interior lot and 5,000 square feet for a corner size lot for backyard cottages, and 5,000 square feet for accessory living quarters. This language pre-dates the adoption of the State laws, therefore the City defers to the State regulations when reviewing ADU applications. The Housing Element includes a program to amend these standards for second units, backyard cottages, accessory living quarters and SB 9 units (i.e., accessory dwelling units (ADUs).

Maximum Floor Area Ratio

The City does not have maximum floor area ratio (FAR) requirements for residential uses in residential zones, as it is typically the measure of the intensity of non-residential development. However, the Development Code and General Plan do have standards that limit FAR in the mixed-use zones. The total allowable FAR per lot includes the floor area of residential units.

- **CMS:** Maximum FAR of 1.0
- **CMX:** Maximum FAR of 1.5
- **CR:** Maximum FAR of 1.0
- **NMX:** Maximum FAR of 1.5
- **RMX:** Maximum FAR of 2.0

Height Requirements

Height limitations are intended to allow projects to achieve the maximum allowable density, while also being responsive to community character. The districts that provide the highest densities for residential development also provide for the highest maximum heights. The maximum height in all residential single-family districts, including the mobile home residential district (RM-MH), is 35 feet, which allows for three stories.

Developments in multi-family districts have the following height limits: 40 feet in the RM-1 district; 50 feet in RM-2; and 60 feet in RM-3. These height limits allow for the maximum densities to be achieved in each zone. With a minor deviation, an applicant can add up to 10 percent to a building's height and with the approval of a Planned Development (PD) Permit, additional deviations from the Development Code and/or General Plan could also be permitted. Developments in Mixed Use Districts have the following height limits: 40 feet in the NMX; 60 feet in CMX; and 75 feet in RMX. Commercial districts allowing for mixed uses including residential development permit buildings up to 35 feet in the CMS zone and 75 feet in the CR zone. This could include small-scale development such as attached single-family residential and townhomes.

Downtown Districts allow the most intense development patterns. Height limits are: 90 feet in DTN (approximately 6 stories), 140 feet in DTG (approximately 10 stories), and 190 feet in DTC (approximately 15 stories). These height standards allow for a range of high-density housing types in the Downtown.

Setbacks

A setback is the required minimum or maximum horizontal distance between the front, sides, and rear of the lot to the building. The City's setback standards are comparable to those of other jurisdictions and are not a constraint to achieving maximum densities. In RS Districts, front setbacks range from 13 feet in the RS-4 and RS-5 zones to 35 feet in the RE and RS-1 zones. Rear setbacks range from 10 feet in RS-4 and RS-5 zones to 20 feet in the rest of the RS zones. Side setbacks in the RS Districts vary from 3 to 35 feet. Downtown, Mixed-Use, and Commercial zones allowing residential development have lower frontage setbacks, averaging about 10 feet, with no rear property setback requirements in mixed use zones or a minimum of 0 feet in downtown and commercial zones. Side property setbacks range from 0 feet in Mixed-Use Districts to 15 feet in the CR district.

Parking

Table 1E-4.4 shows the residential parking requirements in Fresno. The City determines the required number of parking spaces based on the type and size of the residential unit and has found the required parking spaces to be necessary to accommodate the number of vehicles typically associated with each residence. Requirements for covered parking spaces or garage parking are due in large part to the climate of Fresno and extreme heat events. With the passage of AB 2097 in 2022, the City cannot impose minimum parking requirements on projects within a half mile of public transit if the project (1) dedicates a minimum of 20 percent of the total number of housing units to very low-, low-, or moderate-income households for students, the elderly, or persons with disabilities, (2) contains fewer than 20 housing units, or (3) is subject to parking reductions based on any other applicable law. Public transit in this case is defined as a major transit stop with an intersection of 2 or more high frequency bus route stops with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods. **Figure 1E-4.1** shows the areas within the city that would be subject to AB 2097 in relation to the sites inventory. Areas subject to AB 2097 in the northern part of the city are north of Herndon Avenue between N. Blackstone Avenue and State Route (SR) 41, and along Shaw Avenue at N Blackstone Avenue, First Street, and Cedar Avenue. Additional areas exist Downtown, in and around the Downtown Transit Center, and in the South Industrial area along E Jensen Avenue.

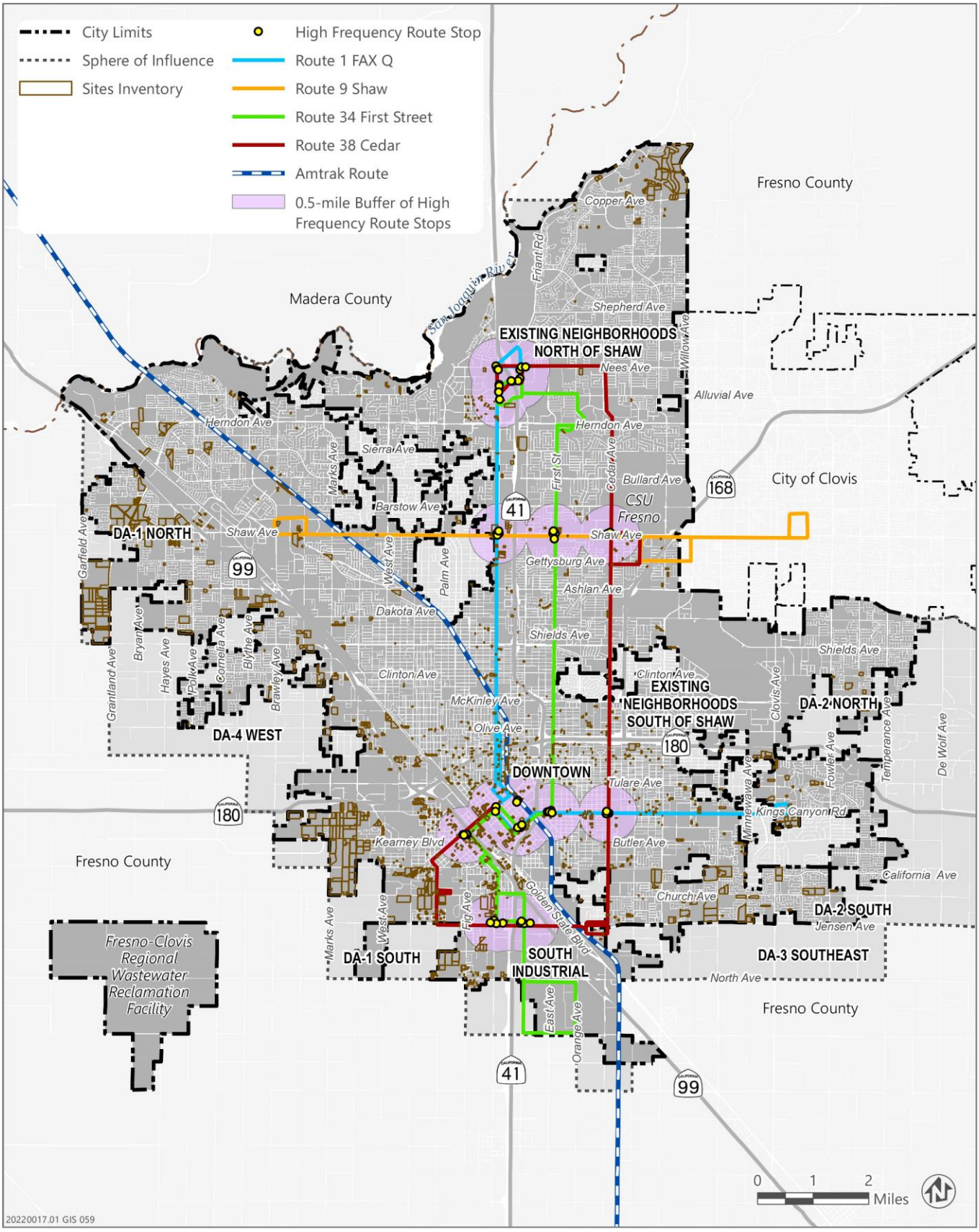
The Housing Element includes a program to amend the Development Code to remove parking minimums within a half mile of public transit, consistent with AB 2097. Parking requirements for ADUs, emergency shelters, and transitional and supportive housing are inconsistent with current (2023) state law therefore the Housing Element includes a program to amend parking requirements for these uses. Additionally, parking for emergency shelters should be based on staffing at the shelter at a rate of one space per employee. The City provides several reductions in parking requirements, including for affordable housing developments (up to 2-bedroom units), mixed-use residential uses (up to 1-bedroom units), specific multi-family developments with transit accessibility, and developments that have shared parking. Residential care developments are eligible for these parking reductions; however, feedback from recent developers state that while the parking reduction is advantageous, the overall number of parking required before and after reduction is high. In response to this feedback, the City has added an action to reduce the parking standard for Residential Care, General.

Table 1E-4.4: Residential Parking Requirements

Use	Parking Requirement	Notes
Single-unit residential constructed prior to adoption of 2016 Development Code	1 space per dwelling unit	Must be covered.
Single-unit residential	1 space per dwelling unit	Must be within a garage.
Duplex	1 space per dwelling unit	Must be within a garage.
Accessory Dwelling Units (ADUs)/ Second Dwelling Units, Backyard Cottages, or Accessory Living Quarters	1 covered space per 1-bedroom unit; 1 additional, covered or uncovered, parking space for 2 or more bedrooms in the second dwelling unit.	A tandem parking space may also be used to meet the parking requirement for the Second Dwelling Unit, providing such space will not encumber access to a required parking space for the primary single-unit dwelling. An existing 2 vehicle garage and/or carport may not be provided in-lieu of these parking requirements unless the parking spaces are accessed from different garage doors.
Multi-Unit Residential (Studio and 1-bedroom)	1 space per unit; 0.75 spaces per unit in MX and CMS Districts; 0.5 spaces per unit in DT Districts	Required parking shall be covered. One additional uncovered guest parking space shall be provided for every 4 units.
Multi-Unit Residential (2-bedrooms)	1 space per unit; 0.5 spaces per unit in DT Districts	Required parking shall be covered. One additional uncovered guest parking space must be provided for every 2 units. In MX and CMS Districts, one additional guest parking space must be provided for every 4 units for projects greater than 4 units.
Multi-Unit Residential (3+ bedrooms)	1.5 spaces per unit; 0.5 spaces per unit in DT Districts	Required parking shall be covered. One additional uncovered guest parking space must be provided for every 2 units. In MX and CMS Districts, one additional guest parking space must be provided for every 4 units for projects greater than 4 units.
Affordable Housing (studio, 1-, and 2- bedroom)	0.75 spaces per unit	--
Affordable Housing (3+ bedrooms)	1.5 spaces per unit	--
Residential Care, Limited (6 or fewer clients)	None in addition to parking required for residential use.	--
Residential Care, General (more than 6 persons)	2 spaces for the owner-manager plus 1 for every 5 beds and 1 for each non-resident employee.	--
Residential Care, Senior	1 space for every 7 residents plus 1 for each live-in caregiver. Facilities serving more than 15 residents shall also provide 1 space for each caregiver, employee, and doctor on-site at any one time.	--
SRO	0.5 spaces per unit	--
Emergency Shelters	1 per 500 sq. ft. of floor area.	
Transitional and Supportive Housing	Subject to parking requirements of the same residential type.	

Source: City of Fresno Development Code, 2022.

Figure 1E-4.1: Assembly Bill 2097 Areas, Fresno 2023



Source: City of Fresno and Ascent, October 2023.

Open Spaces and Parks

All new residential developments have an obligation to provide parkland and/or contribute to the development and maintenance of parks consistent with the Quimby Act. Fresno City Code requires that a minimum of 3 acres per 1,000 population be set aside for parks. Pursuant to State law, in-lieu fees may be paid instead of land dedication. The Park Quimby Fee is $1,542 per unit for single-family dwellings and $1,164 per unit for multi-family dwellings. Article 4.7 Section 12-4.705 states that single-family developments with fewer than 50 parcels shall be responsible for paying the park fee but not for dedicating land. Subdivisions with 50 parcels or more shall pay the fee and dedicate 0.6 acres per 1,000 residents in the form of pocket parks.

Residential developments are required to set aside specific minimum areas of the lot as usable open space, which may include balconies and up to 50 percent of the area in required yards. In Residential Multi-Family (RM) districts, commercial districts allowing residential development (CMS and CR), Mixed-Use (MX) districts, and Downtown (DT) districts, the minimum requirement for on-site open space is based on the size of the lot, as shown in **Table 1E-4.5.** These requirements may be met through a combination of private open space, common open space, or public plazas.

Table 1E-4.5: Minimum On-Site Open Space Requirements, City of Fresno

Zoning District	Percent of Total Lot Area Required to be Dedicated to Open Space*
RM-1	20%
RM-2	15%
RM-3	10%
CMS	15%
CR	8%
CMX	10%
NMX	15%
RMX	8%
DTN	10%
DTG	8%
DTC	5%

**Note: These requirements may be met through a combination of private open space, common open space, or public plazas.*

Source: City of Fresno Development Code, 2022. Table 15-1003 and 15-1004-D.

The minimum amount of open space required in DT and MX districts could be reduced by 25 percent in the following circumstances:

- Any portion of the lot is located within 400 feet of a transit stop with regular, scheduled service.
- There is a public park within 400 feet of the site, or
- The parcel is 15,000 square feet or less in area.

These requirements are in addition to park in-lieu fees which contribute to the public park system. Overall, these open space requirements and the park in-lieu fees do not represent excessive constraints on residential development. The City provides flexibility in how developers can meet the open space requirements.

Additional Standards in Mixed Use Districts

On October 13, 2022, the City adopted the Mixed-Use General Plan and Development Code Text Amendments to modify the development standards for MX Districts and encourage new residential development. Additional standards were added under Section 15-1106 as part of this action. Under these provisions, all projects proposing residential development must prepare a Phase I Environmental Site Assessment (ESA) prior to site approval. In addition, all projects proposing to utilize fill material must conduct property soil testing to ensure the soil is free of contamination. Additional standards listed in Section 15-1106 include not overburdening any existing or planned infrastructure capacities, including, but not limited to, capacities for water, runoff, storm water, wastewater, and solid waste systems. Projects must also comply with all applicable standards from Public Works and the City Public Utility Services. The goal was that if the development complied with all of the items, further environmental analysis could be avoided and a system to process applications ministerially could effectively be established.

Cumulative Impacts Conclusion

The Development Code, like the General Plan, supports increased land use intensity and mixed-use development throughout the city, especially near transit. The cumulative impacts of Fresno's development standards established in the Zoning Code do not unduly constrain achieving the densities permitted by the zones. The components of the City's development standards are described as follows:

- The Zoning Code allows multifamily residential properties in residential zones to have densities ranging from 12 dwelling units per acre to up to 45 dwelling units per acre. For multifamily residential developments in mixed-use zones, there is no maximum density.
- There are no minimum lot area requirements for multifamily residential developments.
- The City does not have maximum FAR requirements for residential uses in residential zones. In mixed-use zones FARs may range between 1.5 and 2.0. There is no maximum FAR requirement for projects in Downtown districts.
- Parking requirements vary, with opportunities for reduced parking in infill areas and for affordable housing.

- Multifamily residential developments have maximum height limits ranging from 35-60 feet. Mixed Use Districts have the following height limits: 40 feet in the NMX; 60 feet in CMX; and 75 feet in RMX. Height limits are: 90 feet in DTN (approximately 6 stories), 140 feet in DTG (approximately 10 stories), and 190 feet in DTC (approximately 15 stories).

Table 1E-4.6 analyzes the cumulative impact of development standards on the ability to achieve maximum densities in the City's multifamily zones. Each of the examples assumes a rectangular one-acre lot and applies the City's setback, lot coverage, parking, and open space standards to determine if projects complying with City standards can achieve maximum densities. The analysis shows that development standards in the RM-1, RM-2, and RM-3 zones do not limit the ability to achieve maximum densities. There is sufficient excess site area remaining after application of the City's development standards to allow the incorporation of additional project amenities that are not required, such as additional parking and open space features.

Table 1E-4.6: Analysis of Multifamily Zone Requirements for Prototype Site Development

Development Standards	RM -1 Zone Standards	RM-2 Zone Standards	RM-3 Zone Standards
Prototype Project Site Size	43,560	43,560	43,560
Net site size w/ required setbacks	33,724	34,668	34,668
Maximum site volume at story limit	101,173	138,672	173,340
Maximum lot coverage (Sq. Ft.)	21,780	21,780	26,136
Maximum permitted density (units)	16	30	45
1 bedroom (900 sf)	11	20	30
2 bedroom (1,100 sf)	5	10	15
Unit square footage total	15,400	29,000	43,500
Unit square footage per story	5,133	7,250	8,700
Parking requirement			
1-bedroom units @ 1.25 sp/unit	14	25	38
2-bedroom units @ 1.5 sp/unit	7	15	22
Total parking required	21	40	60
Square footage for surface parking @ 350 sq. ft/space[1]	7,438	14,000	21,000
Open Space (sq. ft.)	8,712	6,534	4,356
Total sq. ft to accommodate project[2]	21,283	27,784	34,056
Total excess sq. ft. available[3]	12,442	6,884	612

[1] *200 sf/space + 150 sp. Ft. of drive aisle per space*

[2] *Calculated as the net building sq. ft. of the first story + parking sq. ft. + open space sq. ft.*

[3] *Calculated as the net site size – total sq. ft. to accommodate the project*

Source: Ascent, 2023.

The City's development standards are reasonable and typical, allow for maximum densities to be achieved, and do not serve to constrain housing development. The recent mixed use text amendments greatly increased the capacity for residential development in commercial and mixed use zones throughout the city.

Recommended Action

Development and zoning codes can facilitate the very types of development needed. Although the City's land use controls are permissive and flexible, there are additional opportunities to relieve regulatory constraints and facilitate more housing production. Parking standards are one area where many communities are seeking to decrease housing costs. The Housing Element includes a program to identify further ways to facilitate increased housing production throughout the city, including establishing a non-discretionary process to approve qualifying developments based on size, type, affordability level, and location.

Site Improvements

Analysis

Site improvements and property dedications are important components of new development and contribute to the creation of decent housing. Developers are generally responsible for covering the full cost of water, sewer, road, and drainage improvements within their projects. Typically, site improvements are requested during the planning review process.

Improvement requirements are the same throughout the city of Fresno, however some sites require fewer improvements if the infrastructure already exists and is in good condition. Typical off-site infrastructure improvements for new projects include constructing new streets, which include undergrounding of utilities, parkway landscaping, curbs, gutters, sidewalks, and street lighting that are in compliance with standards as defined in the General Plan and the Municipal Code. Local residential streets require a dedication of 56 feet with a curb-to-curb width of 36 feet for a design with parking on both sides of the street (Public Works Standard P-56).

In areas already served by infrastructure, site improvement requirements vary depending on the existing condition of each project site. Usually, only standard connection laterals are required for most project utilities. The undergrounding of utilities from the nearest pole to the project is required of all projects (although there is a process for the granting of waivers in hardship cases), and street tree planting may also be required. New subdivisions typically require public and circulation improvements for the orderly and efficient development of the community.

As stated in the Municipal Code (Section 15-3804), site improvements for residential subdivisions include:

- Grading of streets and alleys, installation of street lighting, drainage pipes or lines, and drainage structures.
- Installation of sidewalks, curbs, gutters, and driveway approaches, unless the Standard Specifications for the Street Section do not require the improvements.
- Surfacing of a width and quality suitable for the particular type of street or alley as established in specifications adopted therefore.
- Pedestrian ways, including paving, landscaping, and fences and walls as may be required.
- Bikeways as may be required.

- Trails, greenways, or parks, as may be required.
- A water system of sufficient design and capacity to furnish an adequate water supply for each lot in the subdivision and for adequate fire protection to the area, as determined by the City Engineer.
- Sanitary sewer facilities and connections for each lot.
- Services from all utilities for each lot, made in such manner that will avoid or minimize disturbance of completed street improvements.
- The installation and planting of median islands, as may be required.
- Street trees
- Street signs
- The installation of an underground street lighting system approved by the City Engineer, as required.

Overall, the purpose of on- and off-site requirements is to ensure the health and safety of residents. On- and off-site improvements vary from about 5 to 20 percent of total development costs depending on the infrastructure improvements needed for the project. Developers indicated that costs in Fresno are equal or slightly higher than other communities, particularly for multifamily housing. In addition to its Inner City Planning Application Fee Incentive Program, the City of Fresno has several fee waiver programs that apply to infill development in economically disadvantaged areas. The most notable of these for affordable housing is the Infill Incentive Program, which has resulted in the waiver of approximately $3.5M in development impact fees for 10 infill projects totaling 603 residential units since 2021. The average fee waived per unit is $5,918, which can be the financial tipping point that allows affordable projects to attain economic feasibility. The Infill Incentive Program waives development impact fees for police and fire facilities, park facilities, regional streets, new growth streets and traffic signals for qualifying projects.

Conclusion

On- and off- site improvements can be costly, but with the fee waiver programs available, infrastructure costs are not considered a major constraint to development, as the required infrastructure and public facilities are necessary to serve the project. While required on- and off-site improvements may add to the cost of housing, there is not evidence that these requirements and associated costs represent a significantly higher standard than other jurisdictions in the County and beyond.

Recommended Action

None required.

Zoning for a Variety of Housing Types

Analysis

The Development Code classifies residential development projects based on type, use, size, and location in order to determine whether the project is Permitted, Conditionally Permitted (through conditional use permit), or Not Permitted. The Development Code provides for a range of housing types, including single-family, multi-family, second dwelling units (i.e., accessory dwelling units), mobile homes, residential care facilities, emergency shelters, supportive housing, transitional housing, and single room occupancy (SRO) units. Refer to **Table 1E-4.8** for a summary of Fresno's Development Code as it relates to ensuring a variety of housing opportunities.

Multifamily

The Development Code allows multifamily units at varying densities in the following districts: Medium High Density (RM-1), Urban Neighborhood (RM-2), High Density (RM-3), Neighborhood Mixed Use (NMX), Corridor/Center Mixed Use (CMX), Regional Mixed Use (RMX), Downtown Neighborhood (DTN), Downtown General (DTG), Downtown Core (DTC), Commercial – Main Street (CMS), and Commercial - Regional (CR) districts. The Development Code and General Plan provide for a range of densities for multifamily in the RM districts (up to 45 units/acre without density bonus in the RM-3 district); and, in the Commercial, Mixed-Use, and Downtown districts with no density limits.

Accessory Dwelling Units - Second Units, Backyard Cottages, and Accessory Living Quarters

In Fresno, Second Dwelling Units, Backyard Cottages, and Accessory Living Quarters are permitted as accessory uses to single-unit dwellings, consistent with the Government Code Section 65852.2. State law refers to these housing types as accessory dwelling units (ADUs). The City's Development Code contains the following descriptions of these permitted unit types:

- **Second Dwelling Unit.** Provides separate, independent living quarters for one household. Units may be attached, detached, or located within the living areas of the primary dwelling unit on the lot. Kitchens, including cooking devices are permitted.
- **Backyard Cottage.** May provide separate, independent living quarters for one household. Units may be attached, detached, or located within the living areas of the primary dwelling unit on the lot. Kitchens, including cooking devices are permitted. Backyard Cottages shall be located behind the primary dwelling unit, unless attached and integral to the primary dwelling unit. A Tiny House may be considered a Backyard Cottage.

- **Accessory Living Quarters.** Accessory Living Quarters provide dependent living quarters. They may be attached, detached, or located within the living areas of the primary dwelling unit on the lot. Accessory Living Quarters may not provide kitchen facilities, however a bar sink and an under-counter refrigerator are allowed, but no cooking devices or other food storage facilities are permitted. Accessory Living Quarters shall not be located in front of the primary single-family dwelling.

Regulations regarding development standards for Second Dwelling Units, Backyard Cottages, and Accessory Living Quarters are delineated in Section 15-2754 of the Development Code. Second dwelling units, backyard cottages, tiny houses, and accessory living quarters may be established on any lot in any residential district where single-unit dwellings are existing or permitted. Only one second unit, backyard cottage, tiny house, or accessory living quarters may be permitted on any one lot.

Units shall conform to the height, setbacks, lot coverage and other zoning requirements of the zoning district in which the site is located. Minimum lot sizes for these developments are as follows: 6,200 square feet for Second Dwelling Units, 6,000 square feet for an interior lot and 5,000 square feet for a corner size lot for Backyard Cottages, and 5,000 square feet for Accessory Living Quarters. Minor deviations and/or variances to meet the minimum lot sizes are not permitted. Per State law, local governments may impose certain development standards on accessory dwelling units however, these standards should not include minimum lot size requirements. The City last updated its Second Dwelling Units, Backyard Cottages, and Accessory Living Quarters ordinance in 2018. New changes to State ADU Law became effective January 1, 2021, to further reduce barriers, streamline approval processes, and expand capacity to accommodate the development of ADUs and Junior ADUs. A program has been added to make further amendments to the ordinance to comply with State law.

The City of Fresno's ADU Program encourages the development of ADUs by offering a selection of pre-approved plans to homeowners (www.fresno.gov/ADU). The plans offer a variety of sizes and styles that will match the diversity of Fresno's neighborhoods and the needs of households throughout the city. These plans can also be used to build small primary homes to help first-time buyers enter the housing market or assist those seeking to downsize.

Senate Bill 9 Subdivisions

Senate Bill 9 (SB 9) became effective January 1, 2022. The bill mandates local jurisdictions to ministerially approve two unit developments and urban lot splits within a single-family residential zone, without discretionary review or hearing, if the proposed development meets certain requirements. For SB 9 developments, the City may apply objective zoning, subdivision, and design standards. The City has developed a submittal checklist application for SB 9 projects.

Manufactured Housing

State law requires local governments to permit manufactured or mobile homes to meet federal safety and construction standards on a permanent foundation in all single-family residential zoning districts (Section 65852.3 of the California Government Code). In Fresno, a manufactured/factory-built house is considered to be a single-family detached dwelling unit and is treated as such.

Residential Care Facilities

Residential Care Facilities Limited (those serving 6 or fewer clients) are allowed by right in all zones that allow residential uses subject to the same development standards and permit processing standards as other residential uses in those zones, pursuant to the California Lanterman Developmental Disabilities Services Act. Residential Care Facilities General (providing care for more than 6 persons) are permitted by right in the RM-2 and RM-3 districts and conditionally permitted in the residential single-family districts (RS-1 to RS-5), the RM-1 district, and in the CMS district. In order for the conditional use to be approved, the following findings must be made by the Director:

- The proposed use is allowed within the applicable zoning district and complies with all other applicable provisions of the Development Code and all other chapters of the Municipal Code;
- The proposed use is consistent with the General Plan and any other applicable plans and design guidelines the City has adopted;
- The proposed use will not be substantially adverse to the public health, safety, or general welfare of the community, nor be detrimental to surrounding properties or improvements;
- The design, location, size, and operating characteristics of the proposed activity are compatible with the existing and reasonably foreseeable future land uses in the vicinity;
- The site is physically suitable for the type, density, and intensity of use being proposed, including access, emergency access, utilities, and services required; and
- The proposed use is consistent with 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.

The City's obligation to affirmatively further fair housing (AFFH) under CA Government Code Section 65580 requires that the findings for a conditional use permit for residential care facilities must be objective. To comply with Housing Element Law, including its AFFH provisions, the Housing Element includes a program to review the CUP findings to ensure they are objective and do not serve as a barrier to approving residential care facilities for more than six. If determined to be a barrier or subjective then the City will amend CUP findings for residential care facilities. The City will continue to allow reasonable accommodations in the permitting of residential care facilities.

Farmworker/Employee Housing

The California Employee Housing Act requires that housing for six or fewer employees be treated as a regular residential use. The Employee Housing Act further defines housing for agricultural workers consisting of 36 beds or 12 units be treated as an agricultural use and permitted where agricultural uses are permitted.

The Fresno Development Code defines Agricultural Labor Housing as living accommodations for employees and their immediate families employed for the exclusive purpose of agricultural pursuits either on the premises or off site. It includes single- or multi-unit dwellings, including mobile homes and dormitories. The definition does not place a limitation on the number of beds or units, and the Development Code states that in the event of a conflict between the Development Code and California Health and Safety Code Section 17021.6, relating to agricultural land use designations for employee housing, the Health and Safety Code would prevail. Agricultural labor housing is permitted by right in the Buffer (B) district. The Buffer District is intended to separate urban uses from commercial agricultural uses to preserve long-term viable agricultural areas and intensive farming operations in adjacent areas. The Buffer District serves to prevent urban residential and related uses from developing near agricultural operations, and thereby infringing on full operation of farmland of importance.

While the definition of Agricultural Labor Housing and the allowance in the Buffer District are in compliance with State law, the Development Code allows agricultural uses, such as crop cultivation, in all single family and multifamily residential districts and therefore should allow Agricultural Labor Housing in these districts in order to fully comply with State law. In addition, the Employee Housing Act requires all employee housing for six or fewer occupants, not just agricultural labor housing, to be treated similar to any other residential use. The Fresno Development Code does not explicitly address this requirement.

The previous 2015 Housing Element included a program directing City Staff to review the Development Code to ensure continued compliance with the Employee Housing Act. The Code was found to meet the requirements of the Employee Housing Act regarding Agricultural Labor Housing and no changes to the Development Code were determined to be necessary. However, in order to increase clarity between the Code and State law, the Housing Element includes a program to permit employee housing for six or fewer as a residential use and permit agricultural labor housing in all zoning districts where agricultural uses are permitted.

Transitional and Supportive Housing

Under Housing Element law, transitional housing means buildings configured as rental housing developments, but operated under program requirements that require the termination of assistance and recirculating of the assisted unit to another eligible program recipient at a predetermined future point in time that shall be no less than six months from the beginning of the assistance (California Government Code Section 65582(h)). Supportive housing means housing with no limit on length of stay, that is occupied by the target population, and that is linked to an onsite or offsite service that assists the supportive housing resident in retaining the housing, improving his or her health status, and maximizing his or her ability to live and, when possible, work in the community. Target population means persons with low incomes who have one or more disabilities, including mental illness, HIV or AIDS, substance abuse, or other chronic health condition, or individuals eligible for services provided pursuant to the Lanterman Developmental Disabilities Services Act of the Welfare and Institutions Code and may include, among other populations, adults, emancipated minors, families with children, elderly persons, young adults aging out of the foster care system, individuals exiting from institutional settings, veterans, and people experiencing homelessness (California Government Code Sections 65582(f) and (g)).

Accordingly, State law establishes transitional and supportive housing as a residential use and therefore local governments cannot treat it differently from other similar types of residential uses (e.g., requiring a use permit when other residential uses of similar function do not require a use permit). The City of Fresno Development Code (Section 15-2762) specifies that transitional and supportive housing constitute residential use and are subject only to those restrictions that apply to other residential uses of the same type in the same district.

With the passage of AB 2162 (2018), Section 65651(a) of the Government Code now prohibits local governments from applying a conditional use permit or other discretionary review to the approval of 100 percent affordable developments that include a percentage of supportive housing units, either 25 percent or 12 units, whichever is greater, on sites that are zoned for residential use. While supportive housing is generally a permitted use in all zones, the City's Development Code does not explicitly comply with this new requirement of state law.

Emergency Shelters

Emergency shelters are allowed without discretionary review in the Regional Mixed-Use (RMX), Commercial – General (CG), Regional Business Park (RBP), Light Industrial (IL), Public and Institutional (PI), Downtown Neighborhood (DTN), Downtown General (DTG), and Downtown Core (DTC) zoning districts. State law (Government Code Section 65583) requires that the Housing Element demonstrate sufficient capacity to meet unmet housing needs for people experiencing homelessness. Chapter 654, Statutes of 2022 (AB 2339), added additional specificity on how cities and counties plan for emergency shelters. Generally, AB 2339 amended State Housing Element Law regarding identification of zones and sites for emergency shelters. Government Code Section 65583 (a)(4) now requires that the zoning designations identified to allow emergency shelters as a permitted use without discretionary review must allow residential uses. In addition, the Housing Element must identify specific sites that could accommodate emergency shelters. If a vacant site is zoned for a non-residential use but allows residential development, such as a mixed-use zone, the site must be located near amenities and services that serve people experiencing homelessness. If the site is nonvacant, the analysis must provide substantial evidence that the existing use is likely to be discontinued during the planning period.

Table 1E-4.7 outlines a summary of vacant land by zoning district that could be utilized to develop an emergency shelter in Fresno. Based on the 2022 Point in Time (PIT) Count, the estimated unhoused population in the City of Fresno is 3,397. There are approximately 1,500 shelter beds available in the city on any given night. Thus, there is a net approximate need of 1,900 new emergency shelter beds to address the City of Fresno's unmet needs.

Table 1E-4.7: Summary of Potential Sites for Emergency Shelters, Fresno, 2023

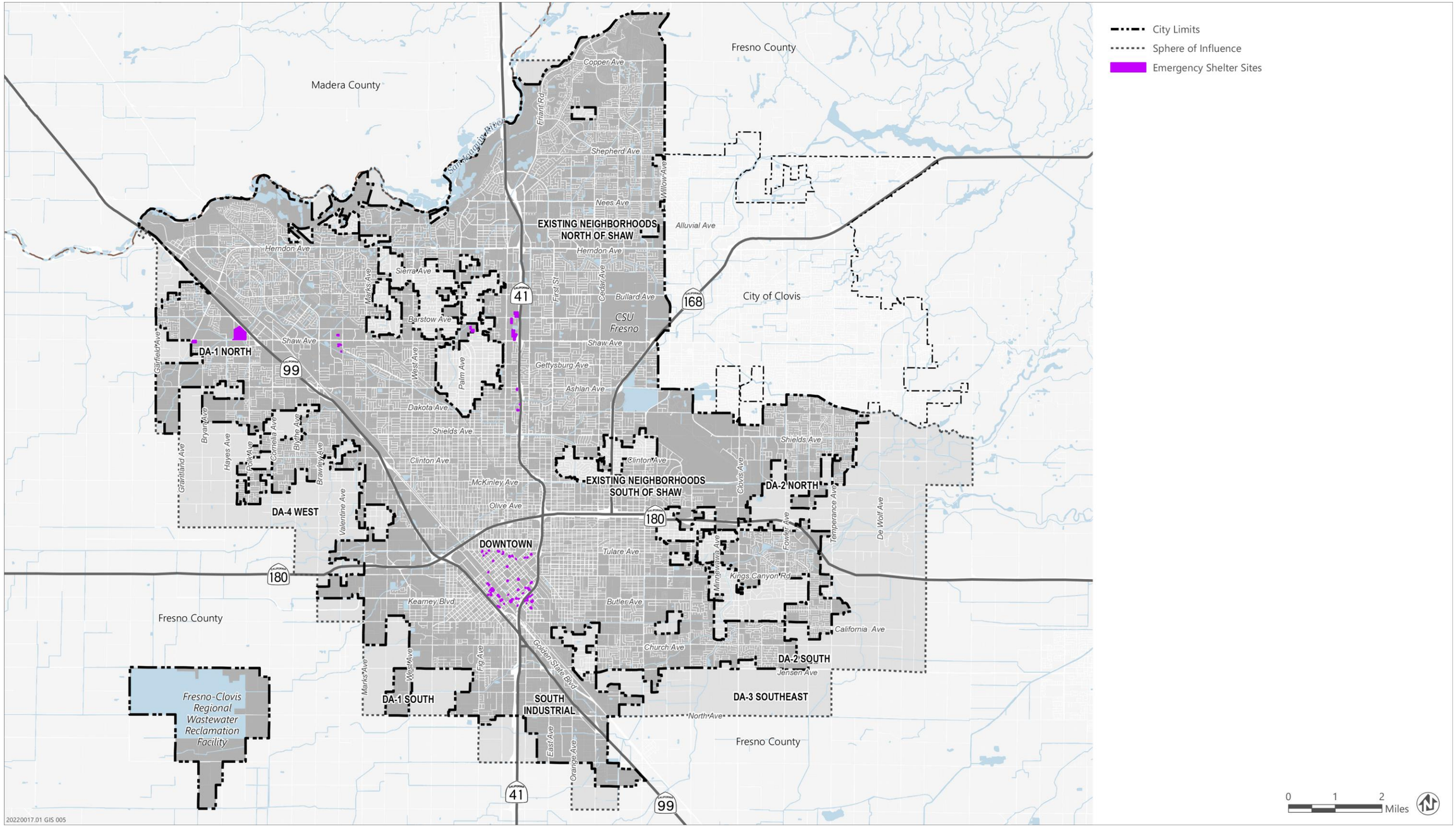
Zoning District	Number of Potential Sites for Emergency Shelters	Total Acreage (Acres)	Vacancy Status	Capacity (# of people)
DTC	3	0.81	Vacant	176
DTG	16	4.08	Vacant	889
DTN	87	23.98	Vacant	5,224
DTN-AH	2	0.61	Vacant	133
RMX	25	63.65	Vacant	13,862
Total	**133**	**93.13**	**-**	**20,284**

Source: City of Fresno, 2023. Ascent, 2023.

To comply with State law, the Housing Element only identifies vacant sites in zoning districts that allow residential use. As such, the sites identified in **Table 1E-4.7** and **Figure 1E-4.2** below are all in either the RMX, DTN, DTG, or DTC Districts, which allow residential and nonresidential mixed uses. A full list of these sites can be found in **Table 1E-4.8** below. There is additional capacity for emergency shelter beds in the remaining nonresidential and industrial zones that allow emergency shelters by right, or without discretionary review (i.e., CG, RBP, LI, and PI districts).

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Figure 1E-4.2: Potential Sites for Emergency Shelters, Fresno, 2023



Source: Ascent, 2023.

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Table 1E-4.8: Potential Sites for Emergency Shelters, Fresno, 2023

APN	Address	Size (Acres)	Vacancy Status	Zoning	Capacity (# of people)
41714021	614 W SAN JOSE AVE	0.09	Vacant	RMX	229
41723120	575 W SAN JOSE AVE	0.43	Vacant	RMX	499
41845014		0.29	Vacant	RMX	1,202
41806054	83 E BARSTOW AVE	0.59	Vacant	RMX	514
41808085		0.34	Vacant	RMX	395
41808082		0.17	Vacant	RMX	515
43602210		0.17	Vacant	RMX	39
43602228		0.11	Vacant	RMX	67
43619308T		0.21	Vacant	RMX	31
43627015	2111 E DAKOTA AVE	0.17	Vacant	RMX	154
42464010	3441 W SHAW AVE	0.34	Vacant	RMX	55
42466004	3471 W SHAW AVE	0.22	Vacant	RMX	49
42466007	3421 W SHAW AVE	0.48	Vacant	RMX	52
42466005	3425 W SHAW AVE	0.34	Vacant	RMX	48
42466002	3477 W SHAW AVE	0.17	Vacant	RMX	51
41504440		0.26	Vacant	RMX	185
50803025		0.28	Vacant	RMX	2,890
50803004	5708 W SHAW AVE	0.33	Vacant	RMX	1,211
51203031		0.55	Vacant	RMX	363
51203038		0.36	Vacant	RMX	363
46504004	1454 G ST	0.25	Vacant	DTN	169
46504003T	1416 G ST	0.17	Vacant	DTN	131
46504022ST	1350 G ST	0.06	Vacant	DTN	110
46504021S	1304 G ST	1.55	Vacant	DTN	183
46703023ST	1266 G ST	1.31	Vacant	DTN	72
46703019ST	1248 G ST	1.47	Vacant	DTN	75
46703025ST	1206 G ST	7.23	Vacant	DTN	148
46706124T	1535 FRESNO ST	11.16	Vacant	DTN	73
46706123T		0.22	Vacant	DTN	26
46703017T	1602 FRESNO ST	0.02	Vacant	DTN	195

APN	Address	Size (Acres)	Vacancy Status	Zoning	Capacity (# of people)
46703004T	1068 G ST	0.03	Vacant	DTN	143
46706211T	1526 FRESNO ST	0.28	Vacant	DTN	56
46710305		0.17	Vacant	DTN	45
46706611	1427 TULARE ST	0.08	Vacant	DTN	38
46706613	1047 F ST	0.18	Vacant	DTN	28
46706334U		0.09	Vacant	DTN	94
46706333	1042 F ST	0.43	Vacant	DTN	19
46706332		0.29	Vacant	DTN	9
46706330	1033 CHINA ALY	0.59	Vacant	DTN	19
46706329		0.34	Vacant	DTN	38
46706328		0.17	Vacant	DTN	6
46706326	1020 F ST	0.17	Vacant	DTN	9
46706325	1016 F ST	0.11	Vacant	DTN	38
46706319T		0.21	Vacant	DTN	16
46706320		0.17	Vacant	DTN	4
46706338U		0.34	Vacant	DTN	57
46706303U		0.22	Vacant	DTN	19
46706304		0.48	Vacant	DTN	9
46706344	1034 CHINA ALY	0.34	Vacant	DTN	60
46706339		0.17	Vacant	DTN	25
46706311		0.26	Vacant	DTN	19
46706312	1022 CHINA ALY	0.28	Vacant	DTN	56
46706335		0.33	Vacant	DTN	31
46706337T	1545 TULARE ST	0.55	Vacant	DTN	18
46706318T		0.36	Vacant	DTN	8
46707412	950 E ST	0.25	Vacant	DTN	75
46707411		0.17	Vacant	DTN	38
46707202	811 G ST	0.06	Vacant	DTN	263
46707316T	730 F ST	1.55	Vacant	DTN	131
46707305T	723 G ST	1.31	Vacant	DTN	19
46707306T		1.47	Vacant	DTN	39

APN	Address	Size (Acres)	Vacancy Status	Zoning	Capacity (# of people)
46708105T		7.23	Vacant	DTN	14
46708123		11.16	Vacant	DTN	10
46708122T		0.22	Vacant	DTN	4
46712118		0.02	Vacant	DTN	19
46712117	615 E ST	0.03	Vacant	DTN	43
46712112	625 E ST	0.28	Vacant	DTN	34
46712113	637 E ST	0.17	Vacant	DTN	26
46712115		0.08	Vacant	DTN	28
46827717	101 VAN NESS AVE	0.18	Vacant	DTN	153
46823527		0.09	Vacant	DTN	261
46827423		0.43	Vacant	DTN	38
46827109	2115 MONTEREY ST	0.29	Vacant	DTN	54
46827104	343 L ST	0.59	Vacant	DTN	27
46827105	333 L ST	0.34	Vacant	DTN	36
46823413	351 M ST	0.17	Vacant	DTN	18
46823113		0.17	Vacant	DTN	37
46830504	1804 SAN BENITO ST	0.11	Vacant	DTN	54
46705013ST	555 H ST	0.21	Vacant	DTN	319
46829506	550 H ST	0.17	Vacant	DTN	135
46829205	514 BROADWAY	0.34	Vacant	DTN	88
46829301	461 FULTON ST	0.22	Vacant	DTN	41
46829319	447 FULTON ST	0.48	Vacant	DTN	16
46826209	511 L ST	0.34	Vacant	DTG	36
46822212T	550 M ST	0.17	Vacant	DTG	65
46822215T	525 N ST	0.26	Vacant	DTG	56
46822216T	505 N ST	0.28	Vacant	DTG	75
46822301T	461 N ST	0.33	Vacant	DTG	38
46822302T	453 N ST	0.55	Vacant	DTG	19
46822319T		0.36	Vacant	DTG	38
46819213T	2504 VENTURA ST	0.25	Vacant	DTG	33
46819214T	2518 VENTURA ST	0.17	Vacant	DTG	65

APN	Address	Size (Acres)	Vacancy Status	Zoning	Capacity (# of people)
46819222	2526 VENTURA ST	0.06	Vacant	DTG	31
46819227	2534 VENTURA ST	1.55	Vacant	DTG	25
46821220T	800 M ST	1.31	Vacant	DTG	160
46826117		1.47	Vacant	DTG	38
46826111		7.23	Vacant	DTG	38
46828607	702 H ST	11.16	Vacant	DTN	38
46825401	2030 TULARE ST	0.22	Vacant	DTC	19
46825402	2060 TULARE ST	0.02	Vacant	DTC	94
46620518T	1408 H ST	0.03	Vacant	DTC	64
46611308	2301 FRESNO ST	0.28	Vacant	DTG	128
46608122	2528 TUOLUMNE ST	0.17	Vacant	DTN	74
46608104	1333 P ST	0.08	Vacant	DTN	37
46605512		0.18	Vacant	DTN	37
46605509	2615 MERCED ST	0.09	Vacant	DTN	25
46605607	2627 FRESNO ST	0.43	Vacant	DTG	45
46607101	75 N BLACKSTONE AVE	0.29	Vacant	DTN	37
46607406	1509 O ST	0.59	Vacant	DTN	75
45932701	1660 N ST	0.34	Vacant	DTN	48
45932702	2415 CALAVERAS ST	0.17	Vacant	DTN	105
46614209	1528 VAN NESS AVE	0.17	Vacant	DTN	75
46613418	2024 AMADOR ST	0.11	Vacant	DTN	38
46613213	1762 VAN NESS AVE	0.21	Vacant	DTN	56
46610332	14 N PARK AVE	0.17	Vacant	DTN	62
46613328	1845 VAN NESS AVE	0.34	Vacant	DTN	72
46604311	1045 U ST	0.22	Vacant	DTN	119
46604201	1050 S ST	0.48	Vacant	DTN- with Apartment House Overlay	78
46603505	2831 MARIPOSA ST	0.34	Vacant	DTN- with Apartment House Overlay	55
46823403		0.17	Vacant	DTN	38
46827501		0.26	Vacant	DTN	12

APN	Address	Size (Acres)	Vacancy Status	Zoning	Capacity (# of people)
41808086		0.28	Vacant	RMX	338
41808087		0.33	Vacant	RMX	286
41808083		0.55	Vacant	RMX	320
50803026		0.36	Vacant	RMX	1,575
50803005		0.25	Vacant	RMX	2,431
46710306		0.17	Vacant	DTN	49
46706327		0.06	Vacant	DTN	3
46706321		1.55	Vacant	DTN	7
46707307T		1.31	Vacant	DTN	61
46827110		1.47	Vacant	DTN	36
46827121	347 L ST	7.23	Vacant	DTN	18
46823423	348 L ST	11.16	Vacant	DTN	38
TOTAL		**93.13**			**20,284**

Source: City of Fresno and Ascent, 2023.

Per state law requirements, the capacity on each site was determined by dividing the square footage of the site by a minimum of 200 square feet per person. As shown in the table below, within the RMX, DTN, DTG, and DTC Districts, there is approximately 93.13 acres of vacant land available that could be developed into a new emergency shelter, which is a sufficient capacity to accommodate the need for 1,900 new emergency shelter beds. These sites are all located within close proximity to frequent transportation, employment opportunities, food, and other resources. Most sites are within walking distance to services and amenities (see **Figure 1E-4.1**).

In addition to the same land use regulations and development standards that apply to all development within the identified districts (e.g., lot size, setbacks, building height), an emergency shelter proposed in these districts must comply with the following operational standards found in Section 15-2729 of the Development Code:

- **Number of Residents.** The number of adult residents, not including staff, who may be housed on a lot that is smaller than one acre shall not exceed the number of persons that may be accommodated in any hospital, elderly and long term care facility, residential, transient occupancy, or similar facility allowed in the same district.
- **Length of Occupancy.** Occupancy by an individual or family may not exceed 180 consecutive days unless the management plan provides for longer residency by those enrolled and regularly participating in a training or rehabilitation program.
- **Outdoor Activities.** All functions associated with the shelter must take place within the building proposed to house the shelter, except for children's play areas, dog parks, outdoor recreation areas,

parking, and outdoor waiting. Outdoor waiting for clients, if any, may not be in the public right-of-way, must be physically separated from the public right-of-way, and must be large enough to accommodate the expected number of clients.

- **Minimum Hours of Operation.** At least eight hours every day between 7 a.m. and 7 p.m.
- **Employee Presence.** On-site employee presence must be provided at all times.
- **Toilets.** At least one toilet must be provided for every 15 shelter beds, unless a greater number is required by State law.
- **Management Plan.** The operator of the shelter must submit a management plan for approval by the Director. The Plan must address issues identified by the Director, including transportation, client supervision, security, client services, staffing, and good neighbor issues.

Most of these requirements are in compliance with State law. However, the hours of operation are expressed incorrectly as shelters are operated at night, not during the day. Public comments also pointed to the standards for the toilets as being excessive. As shown in **Table 1E-4.4** above, the parking requirements for emergency shelters is one (1) space per 500 square feet of floor area. As noted in that section, the Housing Element includes a program to amend parking requirements to achieve consistency with State law. The program also includes amending the Development Code to correct the hours of operation, review and confirm standards for toilets, and to ensure that all standards are compliant with State law.

Low Barrier Navigation Centers

Assembly Bill (AB) 101, passed in 2019, requires that a low barrier navigation center be a use permitted by right in mixed-use zones and nonresidential zones permitting multifamily uses if it meets specified requirements. AB 101 defines "low barrier navigation center" as a housing first, low-barrier, service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter, and housing. The Housing Element includes an implementation program to amend the Zoning Code to comply with this new requirement of Government Code Section 65662.

Single Room Occupancy (SRO) Units

Single room occupancy (SRO) hotels and/or boarding homes, which house between five and 15 guests, are collectively referred to as SROs in the City of Fresno Development Code. SRO units are one room units intended for occupancy by a single individual. It is distinct from a studio or efficiency unit, in that a studio or efficiency unit is a one-room unit that must contain a kitchen and bathroom. Although SRO units are not required to have a kitchen or bathroom, many SROs have one or the other. Buildings that provide SRO units are permitted by right in the CG zone and conditionally permitted in the RM-2, RM-3, NMX, CMX, and RMX districts. The Housing Element includes a program to review standards for SROs and evaluate objective design standards to ensure that units are maintained and safe for all residents long term.

Summary

Table 1E-4.9 summarizes the housing types permitted and conditionally permitted under the Development Code.

Table 1E-4.9: Variety of Housing Types – Land Use Regulations

Uses	B	RE	RS-1	RS-2	RS-3	RS-4	RS-5	RM-MH	RM-1	RM-2	RM-3	NMX	CMX	RMX	CMS	CR	CG	DTN	DTG	DTC
Single-Unit Dwelling	P	P	P	P	P	P	P	-	P	-	-	P (1)	P (1)	P (1)	P(2) (4)	P(2) (4)	-	P	P	-
Second Dwelling Units / Accessory Living Quarters	P	P	P	P	P	P	P	P	P	P	P	P (1)	P (1)	P (1)	P(2) (4)	P(2) (4)	-	P	P	-
Duplex	-	-	-	-	-	-	C	-	P	P	P	-	-	-	-	-	-	P	P	P
Multi-Unit Residential	-	-	-	-	-	-	C	-	P	P	P	P (1)	P (1)	P(1)	P(2) (4)	P(2) (4)	-	P	P	P
Manufactured/ Mobilehomes	-	P	P	P	P	P	P	P	P	-	-	-	-	-	-	-	-	P	P	-
Mobilehome Park	-	-	-	-	-	-	-	P	-	-	-	-	-	-	-	-	-	-	-	-
Agricultural Labor Housing	P	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
SRO	-	-	-	-	-	-	-	-	-	C	C	C	C	C	-	-	P	-	-	-
Group Residential (six or fewer)	P	P	P	P	P	P	P	-	P	P	P	P (1)	P (1)	P(1)	P (3)	P(2)	-	P	P	P
Group Residential (seven or more)	-	-	C	C	C	C	C	-	C	C	C	P (1)	P (1)	P(1)	P (3)	P(2)	-	P	P	P
Residential Care Facilities, Limited (six or fewer)	P	P	P	P	P	P	P	-	P	P	P	P (1)	P (1)	P(1)	P (3)	P(2)	-	P	P	P
Residential Care Facilities, General (seven or more)	-	-	C	C	C	C	C	-	C	P	P	-	-	-	C(3)	-	-	P	P	P
Residential Care, Senior	-	-	-	-	-	-	-	-	C	P	P	P (1)	P (1)	P(1)	C (3)	-	-	P	P	P
Emergency Shelter	-	-	-	-	-	-	-	-	-	-	-	-	-	P	-	-	P	P	P	P

Notes: P = Permitted; C = Requires Conditional Use Permit; "-"= Not Permitted

1 Not allowed on the ground floor within 200 feet of an intersection (measured from the lot line) of two or more major streets with the exception of main building entrances and active community spaces. Other high-activity uses may be approved at the discretion of the Review Authority. Projects with frontage on more than one major street may be excepted from this restriction on one of the major streets at the discretion of the Review Authority.

2 Not allowed on the ground floor along arterials or collectors.

3 Not allowed on the ground floor.

4 Housing projects shall meet the requirements of § 15-1104, § 15-1106, § 15-5102-E, and Table 15-1203-1 in the Development Code.

Source: City of Fresno Development Code, 2022.

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Conclusion and Recommended Actions

The following amendments to the City's Development Code are required to address the provision of a variety of housing types The Housing Element includes implementation programs to amend the Zoning Code to address second, units, residential care facilities, and low barrier navigation centers in addition to tracking legislative changes.

- **Accessory Dwelling Units:** The Development Code is not consistent with State law requirements for accessory dwelling units as new requirements became effective in 2021 including that no minimum lot sizes may be required and new guidance from the State has clarified that a local government must allow one (1) converted ADU, one (1) detached, new construction ADU, and one (1) JADU, in any order, totaling three units. The Code must be updated to achieve consistency with State law and expand capacity to accommodate the development of ADUs and JADUs.
- **Residential Care Facilities:** The Development Code needs to be amended to permit community care facilities for more than six persons in all zones where other residential uses are permitted.
- **Single Room Occupancy (SRO) Units:** The Development Code limits SROs to serve a maximum of 15 guests. This is a potential constraint and will be amended.
- **Low Barrier Navigation Centers:** The Development Code is not consistent with State law requirements for Low Barrier Navigation Centers.
- **Parking Requirements:** The Development Code is not consistent with State law requirements for parking for ADUs, emergency shelters, and supportive housing.
- **Supportive Housing.** The Development Code does not explicitly comply with Government Code Section 65651(a) (i.e., AB 2162) requirements for affordable housing developments containing a specified percentage of supportive housing units.
- **Farmworker and Employee Housing:** There is ambiguity between the Development Code and State law so the amendments are recommended to permit employee housing for six or fewer as a residential use and permit agricultural labor housing in all zoning districts where agricultural uses are permitted.

Density Bonus

Analysis

Under current state law (Government Code Section 65915), cities and counties must provide a density increase of 20 to 80 percent, determined on a sliding scale, over the otherwise maximum allowable residential density under the Municipal Code and the Land Use Element of the General Plan. In addition to the density bonus, eligible projects may receive one to four additional development incentives or concessions, depending on the proportion of affordable units and level of income targeting. These incentives/concessions could address a height limitation, a setback requirement, a floor area ratio, an on-site open-space requirement, or other requirements. State law also provides additional relief from parking requirements if requested by a developer for a density bonus project.

Article 22 of the City's Development Code outlines the Density Bonus Ordinance that is in accordance with California Government Code Section 65915. Development Code Section 15-2202 states that "where conflict may occur between the provisions of this section and State law, the State law shall govern."

Conclusion and Recommended Action

The City last updated the Density Bonus Ordinance in 2019 and it does not reflect the latest state law requirements, which require cities and counties to grant up to four incentives or concessions for density bonus projects that include 100 percent of units to low- or very low-income households. The Housing Element includes a program to update the City's Density Bonus programs and monitor legislation from the State on density bonus requirements and maintain up-to-date marketing and educational materials such as website information or permit bulletins.

Processing and Permit Procedures

Analysis

Processing and permit procedures can affect the time and cost of developing a residential project. Ineffective or unclear processing and permit procedures may also discourage a developer from taking on the risk of proposing a housing project altogether.

Transparency in Development Regulations

The City of Fresno complies with the requirement of providing transparency in development regulations. The Planning & Development page of the City website provides all necessary information on Planning and Building and Safety divisions (https://www.fresno.gov/darm/). The information on the website covers the following:

- Long-range planning documents, including the General Plan, the City Development Code, and adopted community plans and specific plans
- Permit requirements and development process
- Planning applications, forms, and informational handouts
- Schedule of fees
- Property information
- Efficiency and Incentive Programs

Permit Processing

Development review is conducted by the City of Fresno Planning and Development Department with responsibilities including current and advance planning functions. Current planning includes staffing the public counter to receive applications and answer questions, processing and analysis of various entitlements, permit issuance and corrected exhibit processing for public and private projects. It also involves providing engineering and technical staff support to commercial and residential projects.

Advanced planning includes updates to the General Plan and Development Code, preparation of various community and specific plans, and special environmental, transportation, housing and demographic studies. This division also promotes regional planning coordination with various agencies.

Primary Planning Permits and Actions

The following table displays a brief summary of the permits and actions that are administered under the City's Development Code (**Table 1E-4.10**). The table is not regulatory. For complete regulations, procedures, and requirements, see Articles 49 through 66 of the Municipal Code.

Table 1E-4.10: Planning Permits and Actions*

Proposed Activity	Permit or Action Required	Type of Decision	Review Authority
Use-Only Proposals			
Establishment of a (P) Permitted use, not associated with development of property	Zone Clearance	Ministerial	Director
Establishment of a (C) Conditional use	Conditional Use Permit	Discretionary Quasi-Judicial	Director (PC on referral)
Establishment of a Temporary use	Temporary Use Permit	Discretionary Quasi-Judicial	Director
Establishment of use which is not listed in this Code	Director's Determination	Ministerial	Director
Development Proposals			
Development of one single-family home, duplex, or qualifying Downtown housing** which complies with all provisions of the Code	Zone Clearance	Ministerial	Director
Development of property to a greater extent than is covered by a Zone Clearance	Development Permit (Formerly Site Plan Review)	Discretionary Quasi-Judicial	Director (PC on referral)
Request for relief from property development standards due to unique conditions in conjunction w/a Development Permit	Variance	Discretionary Quasi-Judicial	Director (PC on referral)
Request for relief from property development standards of 10% or less in conjunction with a Development Permit	Minor Deviation	Discretionary Quasi-Judicial	Director
Innovative development proposal which does not comply with the provisions of any zone district within this Code	Planned Development Permit	Discretionary Quasi-Judicial	Director (PC on referral)
Other Proposals or Actions			
Formal interpretation of this Code, verifications of prior permits, or confirmation of zoning district	Zoning Inquiry	Ministerial	Director
Minor changes to approved plans, consistent with original findings and conditions	Minor Modification	Ministerial	Director
Change to discretionary permit or change to approved plans that would affect findings or conditions	Major Modification	Discretionary Quasi-Judicial	Review Authority of Original Permit

Proposed Activity	Permit or Action Required	Type of Decision	Review Authority
Violation of conditions or terms of permit	Revocation of Permit	Discretionary Quasi-Judicial	Director, PC, or CC
Modifications of or exceptions from regulations to ensure equal access to housing for individuals with disabilities	Reasonable Accommodation for Housing	Discretionary Quasi-Judicial	Director
Proposals to change a regulation within this Code	Development Code Text Amendment	Discretionary Legislative	CC
Proposal for development which complies to regulations of an existing district, but not the one currently applied to the site	Rezone	Discretionary Legislative	CC
Change of the General Plan land use designation for a site	Plan Amendment	Discretionary Legislative	CC
Large, multi-phase project which needs certainty regarding regulations over time in exchange for public benefits	Development Agreement	Discretionary Legislative	CC

** For complete regulations, procedures, and requirements, see Articles 49 through 66 of the Municipal Code.*

*** Downtown projects that meet all of the following criteria qualify for a Zone Clearance:*

- *Located within a DT District;*
- *A minimum of 16 total dwelling units in the project;*
- *A residential density of no less than 20 du/ac;*
- *Residential uses must occupy 50 percent or more of the total floor area; and*
- *No historic resources or potential historic resources are located on the site.*

PC = Planning Commission and CC= City Council

Source: City of Fresno, Table 15-4907 of the Municipal Code, 2022.

Preliminary Application Process

As of October 1, 2022, the Development Review Committee (DRC) Preliminary Application Review Process is voluntary, and a "formal" DRC Pre-Application is no longer required for most projects. Preliminary application review is required for subdivisions and voluntary for any project that requires a discretionary approval, including, but not limited to, Development Permits, Conditional Use Permits, Variances, Planned Developments, Rezones, General Plan Amendments, and Annexations. This affords a developer flexibility to determine the feasibility of a project prior to preparing detailed plans and paying the more extensive entitlement. The Fresno Planning and Development Department conducts the pre-application review every Tuesday as part of a Development Review Committee.

Zone Clearance

Zone Clearance is a ministerial, or non-discretionary, entitlement that is reviewed and approved at the staff level. A Zone Clearance is required to confirm that the project is being proposed in a manner which is compliant with, and without any deviations from, all applicable development standards prior to securing a building permit. The purpose of the Zone Clearance process is to streamline the review of many permitted uses. If a proposed development project does not meet the threshold for a Zone Clearance, it's required to get a Development Permit.

The City classifies Zone Clearance projects into Low-Level, Moderate-Level, and Major-Level Zone Clearances. Low Level Zone Clearance applies to projects that are typically approved "over-the-counter" and require confirmation by the Current Planning Division that the proposed business or use is consistent with applicable development or performance standards of the Development Code. Applicable uses could include a home occupation or a bed and breakfast – up to 2 rooms. A Low-Level Zone Clearance typically takes 1-7 business days for review if submitted digitally through Citizen's Portal or the day of, if handled in person "over-the-counter." Moderate-Level Zone Clearances applies to a single-family residence, duplex, or accessory dwelling unit (ADU) and typically takes 1 to 14 business days to review. Major-Level Zone Clearances apply to projects that typically require input from other internal departments or outside agency staff. To that end, the City's review of Major-Level Zone Clearance applications requires additional analysis to determine consistency with other department or agency conditions as well as applicable development or performance standards of the Development Code. Certain projects requiring a Major-Level Zone Clearance may also include courtesy noticing to surrounding property owners. Applicable uses could include a streamlined multi-family development. A Major-Level Zone Clearance typically takes 30 business days for review.

Conditional Use Permit, Variance, and Development Permit

The Conditional Use Permit (CUP) is intended to apply to uses that are generally consistent with the purposes of the district where they are proposed but require special consideration to ensure that they can be designed, located, and operated in a manner that will not interfere with the use and enjoyment of surrounding properties or adversely affect the City's infrastructure, the built or natural environment, City resources, or the City's ability to provide public services. A CUP application is required for exceptions to certain development standards. In order for a CUP to be approved, the following findings must be made by the Director:

- The proposed use is allowed within the applicable zoning district and complies with all other applicable provisions of the Development Code and all other chapters of the Municipal Code;
- The proposed use is consistent with the General Plan and any other applicable plan and design guideline the City has adopted;
- The proposed use will not be substantially adverse to the public health, safety, or general welfare of the community, nor be detrimental to surrounding properties or improvements;
- The design, location, size, and operating characteristics of the proposed activity are compatible with the existing and reasonably foreseeable future land uses in the vicinity;
- The site is physically suitable for the type, density, and intensity of use being proposed, including access, emergency access, utilities, and services required; and
- The proposed use is consistent with 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.

A Variance is a request to modify development standards due to special circumstances. Variances may be granted in conjunction with a Development Permit to vary or modify dimensional and performance standards, but Variances may not be granted to allow uses or activities or increase density that this Code does not authorize for a specific lot or site. Applications for a Variance shall be filed with the Planning Division then the Review Authority of the associated Development Permit shall approve, conditionally approve, or deny applications for Variances based on the following findings:

- There are exceptional or extraordinary circumstances or conditions applicable to the property involved that do not apply generally to property in the vicinity and identical zoning classification, and that the granting of a Variance will not constitute a granting of a special privilege inconsistent with the limitations on the property in the vicinity and identical zone classifications;
- The granting of the application is necessary to prevent a physical hardship which is not of the applicant's own actions or the actions of a predecessor in interest;
- The granting of the application will not be detrimental or injurious to property or improvements in the vicinity, and will not be detrimental to the public health, safety, general welfare, or convenience, nor the preservation and conservation of open space lands; and
- The granting of the Variance will be consistent with the general purposes and objectives of this Code, any applicable operative 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, and of the General Plan.

A Development Permit (formerly Site Plan Review) is required for all new structures, with the exception of one single-family home, a duplex, or a qualifying Downtown housing project which complies with all provisions of the Development Code, which can be completed through a ministerial Zone Clearance. These permits are intended to ensure that projects can be designed, located, and operated in a manner that will not interfere with the use and enjoyment of surrounding properties or adversely affect the built or natural environment, the city's infrastructure, city resources, or the City's ability to provide public services. Applications are reviewed by Planning staff and are only considered by the Planning Commission or City Council by appeal. Processing normally does not exceed 60 business days; however, some decisions may be appealed to the Planning Commission, and in such instances, the processing time can be extended by as many as 30-45 business days.

The Director or Planning Commission may only approve a Development Permit application if it finds that the application is consistent with the purposes of the Development Code and with the following:

- The applicable standards and requirements of the Code.
- The General Plan and any operative plan or policies the City has adopted.
- Any applicable design guidelines adopted by the City Council.
- Any approved Tentative Map, Conditional Use Permit, Variance, or other planning or zoning approval that the project required.

- 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.

Design Review Standards

Site design development standards as well as façade development standards are incorporated into the Development Code for all districts. For mixed use and multifamily, the City provides applicants with a "certainty" option based on objective standards as well as a "flexibility" option if an applicant desires to deviate from objective standards. The standards for site designs are objective for the most part; however, there are some components of façade design standards that rely on the discretion of the Review Authority leaving room for subjectivity. For example, the Development Code states that windows, cladding, and finishing materials in residential single-family districts must be similar to, or within proportion of, adjacent homes. The Review Authority also has discretionary approval to determine the sufficiency of screening in multifamily developments. While the City's standards are mostly objective, there are a few standards that could be modified to remove subjectivity.

Subdivision, Tentative Parcel Map Review

Subdivision of real property is initiated via the tentative tract or tentative parcel map process. Tentative maps are processed and approved in 75-90 business days when not being processed along with other entitlements such as Rezones or Plan Amendment applications. The final map process is essentially ministerial with major responsibility for prolonged processing resting with the developer and the developer's engineer.

Environmental Assessment

An environmental assessment of a residential development is usually conducted simultaneously with the subdivision/parcel map review process or as special permits are processed. The assessment does not substantially add to overall processing time unless significant adverse environmental effects are determined, and evidence indicates that an EIR is required which can then take 9 to 12 months. Since the City of Fresno has certified a Program EIR (PEIR SCH No. 2019050005) for its General Plan and Development Code, some residential development is able to be streamlined by tiering from the citywide analysis of impacts associated with implementing the General Plan and Development Code.

Annexation

The City and County of Fresno continue to process annexations, in conjunction with a joint policy that all urban-intense development within the City's Sphere of Influence is referred to the City for annexation and the processing of entitlements. The time necessary to process annexations on the urban fringe averages about one year, even with the City's concurrent processing of entitlements policies. There is sufficient annexed and zoned land within the city to accommodate the housing needs for this Housing Element planning period. The City monitors land supply, underutilized parcels, areas planned for redevelopment, and resulting development to ensure a balance.

Historic Preservation

Section 12 Article 16 of the Municipal Code codified the City's Historic Preservation Ordinance. The overarching goal of the Historic Preservation Ordinance is to sustain historic resources, particularly their character-defining features. For this, there is a Historic Review process in place to consider project proposals. Under the provisions of the Ordinance, Historic Review is required for all demolition permit applications and all permit applications on a designated historic property. All permit applications that require Historic Review shall be routed to the Historic Preservation Specialist through Current Planning or Building and Safety Services staff.

The Pre-Application process is helpful for many to learn the general rules and procedures applicable to projects involving historic resources and can assist the applicant in determining whether a potential project is likely to be permissible under the Ordinance. Applicants are encouraged to have a pre-submittal meeting with the Historic Preservation Specialist prior to the submittal of application materials. The Specialist may approve, in the name of the Historic Preservation Commission (HPC), non-substantial alterations based on the application presented.

Prior to submitting a formal application, applicants have the option of submitting conceptual plans to the Historic Preservation Commission for review and comment in order to seek advisement before moving forward in preparation for a proposed project. Initial review for all permit applications that require Historic Review could take up to 10 business days upon receipt by the Historic Preservation Specialist. Additional materials and further review may be required.

Processing Timelines

Considerable holding costs are associated with delays in processing development applications and plans. The City of Fresno's development review process is designed to accommodate housing development applications of various levels of complexity and requiring different entitlements. Processing times vary with the complexity of the project. Single-family dwelling unit applications typically take 1 to 14 days if a single unit on one lot; 6 to 8 months if part of a subdivision. Multi-family development applications take 2 to 3 months through the Development Permit (previously Site Plan Review) process and an additional 14 to 21 days for building permits.

Table 1E-4.11 shows the approval body and typical processing times for the City's permitting and processing procedures. These timelines are consistent with the Permit Streamlining Act and are not considered a constraint on housing development.

Table 1E-4.11: Timelines for Permit Procedures

Type of Approval or Permit	Typical Processing Time (# of Business Days)	Approval Body
Ministerial Review	1-30 days, depending on Level	City Staff
Conditional Use Permit	30-90 days, depending on Level	Planning Director[1]
Variance	75-90 days	Planning Director [1]
Minor Deviation Assessment	1-14 days	Planning Director[1]
Zone Change	90-120+ days	City Council
General Plan Amendment	90-120+ days	City Council
Tract Maps	75-90 days	Planning Commission
Parcel Maps	75-90 days	Planning Director[1]
Historic District Review	10 days	Historic Preservation Commission
Environmental Assessment	Categorical Exemption = 1-14 days Negative Declaration (ND) & Mitigated ND = 75-90 days Environmental Impact Report = 9-12 months	Same approval body as Type of Approval or Permit

[1] *Subject to appeal*

Source: City of Fresno,2023.

Typical Development Processing Procedures for Residential Projects

Processing procedures vary by the residential use and the size of the proposed development. Residential development projects, based on type and size, are subject to one or more of the procedures listed above. The Planning and Development Department is responsible for application intake, plan checking, permit issuance, and inspection services for public and private projects. This Department provides public counter services, subdivision processing, urban growth management, various entitlements associated with development, and engineering and technical staff support to commercial and residential projects. The Current Planning Division and Building and Safety Services Division within the Department have as a primary objective the expeditious and accurate review of all development projects.

For single-family developments, it typically takes up to 30 days for developers to pull building permits after receiving entitlements are approved. For multifamily developments, the time between entitlement approvals and building permit submittals is longer. Based on recent projects, it can take three months to a year for developers to pull building permits after entitlements are approved. To encourage development in the central, more urbanized parts of Fresno, the City provides priority processing to all projects within the boundaries of the Downtown Planning Area and in Inner City Residential areas.

Table 1E-4.12 generally identifies the typical approvals required for various residential projects along with the estimated processing times of the planning and building departments.

Table 1E-4.12: Approvals and Processing Times for Typical Developments

Project Type	Typical Approval Requirements	Approval Body	Typical Processing Time (# of Business Days)	Number of Public Hearings	Findings
Accessory Dwelling Units	• Zone Clearance • Building Plan Review • Permitting • Inspection	City Staff	Planning = 2 days Plan Check = 14-21 days [2]	0	No findings required
Single-Family	• Zone Clearance • Building Plan Review • Permitting • Inspection	City Staff	Planning = 1-14 days Plan Check = 14-21 days [2]	0	No findings required
Multi-family	• DP/CUP[1] • Building Plan Review • Permitting • Inspection	Development Permit: City Staff CUP: City Staff or PC on referral	Planning = 75-90 days Plan Check = 21 days [2]	0-1	Development Permit Required Findings (Sec. 15-5206) Conditional Use Permit Required Findings (Sec. 15-5306)
Subdivision	• Tentative Map • Subdivision Review Committee • Environmental Assessment • Planning Commission • Building Plan Review • Public Works Plan Review • Final Map • Permitting • Inspection	Planning Commission	Planning = 75-90+ days if no accompanying rezone or plan amendment application. Plan Check = 14-21 days [2]	1	Tentative Maps required findings (Sec. 15-3309)

[1] Subject to appeal. A CUP only applies when multifamily housing is proposed in the RS-5 (single family) zone district.

[2] Varies by sq. ft., building type, design, complexity and volume of workload; inspection times not included

DP = Development Permit

Source: City of Fresno,2023.

Required Findings

The following are the findings required for the various permit types identified in the table above:

- **Development Permit Required Findings:** The Director or Planning Commission may only approve a Development Permit application if it finds that the application is consistent with the purposes of this article and with the following:

  A. The applicable standards and requirements of this Code.

  B. The General Plan and any operative plan or policies the City has adopted.

  C. Any applicable design guidelines adopted by the City Council.

  D. Any approved Tentative Map, Conditional Use Permit, Variance, or other planning or zoning approval that the project required.

  E. 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.

- **Conditional Use Permit Required Findings:** A Conditional Use Permit shall only be granted if the decision-maker determines that the project as submitted or as modified conforms to all of the following criteria. If the decision-maker determines that it is not possible to make all of the required findings, the application shall be denied.

  A. The proposed use is allowed within the applicable zoning district and complies with all other applicable provisions of this Code and all other chapters of the Municipal Code;

  B. The proposed use is consistent the General Plan and any other applicable plan and design guideline the City has adopted;

  C. The proposed use will not be substantially adverse to the public health, safety, or general welfare of the community, nor be detrimental to surrounding properties or improvements;

  D. The design, location, size, and operating characteristics of the proposed activity are compatible with the existing and reasonably foreseeable future land uses in the vicinity; and

  E. The site is physically suitable for the type, density, and intensity of use being proposed, including access, emergency access, utilities, and services required; and

  F. The proposed use is consistent with 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.

- **Tentative Maps Required Findings:**

  A. Findings. The Review Authority may approve or conditionally approve a Tentative Parcel Map or Tentative Map if it makes all of the following findings:

1. Consistency. The proposed subdivision, together with the provisions for its design and improvement, is consistent with the General Plan, any applicable operative plan, adopted policies or guidelines, and the Municipal Code.
2. Passive and Natural Heating and Cooling. A subdivision for which a Tentative Map is required shall provide pursuant to the Map Act (Section 66473.1), to the extent feasible, for future passive or natural heating or cooling opportunities in the subdivision. Examples of passive or natural heating opportunities in subdivision design include:
    a. Design of lot size and configuration to permit orientation of a structure in an east-west alignment for southern exposure and to take advantage of shade or prevailing breezes. Consideration shall be given to local climate, to contour, to configuration of the parcel to be divided, and to other design and improvement requirements, and such provision shall not result in reducing allowable densities or the percentage of a lot which may be occupied by a building or structure.
    b. The requirements of this section do not apply to condominium projects that consist of the subdivision of airspace in an existing building when no new structures are added.
    c. For the purposes of this section, "feasible" means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors.
3. Availability of Water. Water will be available and sufficient to serve a proposed subdivision with more than 500 dwelling units in accordance with the Map Act (Section 66473.7).
4. Infrastructure Capacity. There exists sufficient infrastructure capacity for water, runoff, storm water, wastewater, and solid waste systems to serve the proposed subdivision. In cases where existing infrastructure is found to be deficient, plans shall show how sufficient capacity will be provided.
5. Compliance with Floodplain Regulations. The proposed subdivision is compliant with the City of Fresno Floodplain Management Ordinance and the State of California Code of Regulations Title 23, as well as any other applicable State or federal law.

B. Supplemental Findings. In addition to the findings required for approval of a Tentative Map or Tentative Parcel Map by Subsection A above, the Review Authority shall not approve a Tentative Parcel Map or Tentative Map unless it can also make the following findings, when they are applicable to the specific subdivision proposal.

1. Construction of Improvements. It is in the interest of public health and safety, and it is necessary as a prerequisite to the orderly development of the surrounding area, to require the construction of improvements within a specified time after recordation of a Parcel Map of four or fewer parcels where improvements are required.

2. Condominiums. Any applicable findings required by Section 15-3913, Findings, for Condominium Conversions.
3. Dedications or Exactions. Any applicable findings required by Article 37, Dedications and Reservations, if dedications or exactions are required.
4. Waiver of Parcel Map. The findings required by Section 15-3503, Waiver of Parcel Map, if waiver of a Parcel Map has been requested with the Tentative Map application.

Permit Streamlining

The State Permit Streamlining Act (Government Code Section 65920) identifies timeframes for review of development applications. The Act also contains provisions that require cities to identify information needed for a complete application, and to provide follow-up information requests within certain timeframes. Government Code Section 66300 (Senate Bill 330, 2019) and Government Code Section 65913.4 (Senate Bill 35, 2017) also address permit processing streamlining. As described below, Senate Bill 330 applies to housing developments, including mixed-use projects with at least two-thirds of the square footage dedicated to residential. Senate Bill 35 established a streamlined ministerial approval process for qualified affordable housing projects or infill projects of 10 units or fewer. Both of these laws also establish specific timeframes for project approval.

Senate Bill 330

Senate Bill 330 (SB 330) prohibits cities and counties from enacting a development policy, standard, or condition that would impose or enforce design standards that are not objective design standards on or after January 1, 2020 [Government Code Section 663300 (b)(C)]. The bill also established specific requirements and limitations on development application procedures.

In addition, the legislation creates a preliminary application process. Submittal of a SB 330 preliminary application allows a developer to provide a specific subset of information on the proposed housing development before providing the full amount of information required by the local government for a housing development application. Submittal of the preliminary application secures the applicable development standards and fees adopted at that time. The project is considered vested, and all fees and standards are frozen, unless the project changes substantially.

Currently (2023), the City offers an optional preliminary application checklist for all entitlement applications to advise a prospective applicant of current City standards and requirements. Pre-application meetings have helped to shorten the review process and allow for better communication between applicants, City departments, and utility providers. However, the City has not yet developed an SB 330 preliminary application form. The Housing Element includes a program to establish such an application to streamline processing procedures.

The City has adopted objective design standards for multifamily districts, contained in Section 15-1005 of the Development Code.

Senate Bill 35

Government Code Section 65913.4 requires jurisdictions that have not approved enough housing units to meet their RHNA to provide a streamlined, ministerial entitlement process for housing developments that incorporate affordable housing. However, to be eligible, projects must also meet a long list of other criteria, including prevailing wage requirements for projects over 11 units. In order for applicants to take advantage of Senate Bill 35 (SB 35), per Government Code Section 65913.4 (10)(b)(1)(a)(et seq.) they need to submit a Notice of Intent and jurisdictions need to give Native American tribes an opportunity for consultation. Fresno accepts SB 35 applications consistent with the law. As of January 1, 2022, planners include the following note during the Development Review Committee (DRC) process for projects with more than 25 dwelling units:

> *The City of Fresno encourages the development of safe, decent, and affordable housing. A streamlined development process may be available for affordable housing projects meeting certain criteria based on Senate Bill 35. For more information on affordable housing incentives please contact your project planner.*

Approximately one applicant has requested SB 35 streamlining as of June 2023. Per HCD Guidelines, a local government that has been designated as subject to the Streamlined Ministerial Approval Process by the Department shall provide information, in a manner readily accessible to the general public, about the locality's process for applying and receiving ministerial approval, materials required for an application as defined in Section 102(b) of the Streamlined Ministerial Approval Process Guidelines, and relevant objective standards to be used to evaluate the application. The Housing Element includes a program to establish written procedures for SB 35 streamlined ministerial approval and make them available on the City's website.

Conclusion and Recommended Actions

The City's permit procedures do not unduly constrain housing development and average project review process timelines comply with the requirements of the Permit Streamlining Act. The City has made several updates to the development review process to simplify and enhance the process for applicants. The City also provides technical assistance and development incentives (e.g., Infill Incentive Fee Waivers) to make development cheaper and easier. For mixed use and multifamily, the city provides applicants with flexible site design development standards as well as façade development standards. The City attempts to run some processes and approvals concurrently where feasible to limit the approval time frame.

Atypical projects are subject to any number of factors, many outside the control of the City, which may extend the processing time, including environmental review under CEQA and permitting requirements of other agencies. The City offers an optional preliminary application checklist for all entitlement applications which has helped to shorten the review process and allow for better communication between applicants, City departments, and utility providers. The City has been generally successful in executing priority processing for new projects in the Downtown Planning area, with approvals being issued on average in less than 75 days. Additionally, the City continues to provide impact fee waivers for qualifying projects and offers reduced application fees and priority processing for single-family and multi-family projects within the Inner City Fee Program area.

While the City has made significant efforts to streamline the permitting process, there are still additional opportunities to streamline the process. The Housing Element includes programs to further streamline residential development, including exploring ways to approve housing for qualifying developments based on size, type, affordability level, and location, establishing a preliminary application process consistent with SB 330, preparing written procedures for SB 35 applications, and reviewing design standards to ensure objectivity and approval certainty.

Local advocates commented that higher density development in Fresno is prone to local opposition which can slow down the approval of multi-family housing that requires a use permit. Programs to further streamline the development process can address this constraint.

Building Codes and Enforcement

Analysis

The City currently uses the 2022 California Building Code. The 2023 edition will become effective on January 1, 2024.

The 2022 California Residential Code (CRC) and the 2022 California Green Building Standards Code apply to single family residential projects as well as the following codes by reference:

- 2022 California Mechanical Code;
- 2022 California Plumbing Code;
- 2022 California Electrical Code; and
- 2022 California Energy Code

The following codes apply to multi-family residential building projects:

- 2022 California Building Code,
- 2022 California Green Building Standards Code,
- 2022 California Mechanical Code;
- 2022 California Plumbing Code;
- 2022 California Electrical Code; and
- 2022 California Energy Code.

Amendments to the California Building Code

Amendments to the California Building Code (CBC) per Section 11-102 of the Fresno Municipal Code are as follows:

CBC Chapter 1

103.1 Creation of the Enforcement Agency. The Planning and Development Department of the City of Fresno is hereby established in the City of Fresno as the appropriate code enforcement agency that shall be under the administrative and operational control of the Department Director.

104.1 General. The Director of the Planning and Development Department or his/her designee shall act on behalf of the City of Fresno as "Building Official." The Building Official is hereby authorized and directed to enforce all provisions of this code. The Building Official shall have the power to render interpretations of this code and to adopt and enforce rules and supplemental regulations in order to clarify the application of the code provisions.

109.2 Schedule of Fees. All fees assessed in accordance with the provisions of the Fresno Building Code shall be set forth in the City of Fresno Master Fee Resolution.

109.5 Related Fees. Where plans are of such complexity, incomplete, or are changed so as to require additional plan review time than contemplated by the fees set forth herein, an additional fee shall be shall be charged in accordance with the special services request provision under the Master Fee Resolution with the following exception:

a) For commercial plans with multiple buildings of identical building footprints and floor plans, the plan review fee shall be as determined by the Building Official. The fee shall be based upon circumstances pertaining to the specific application and shall be designed to recover reasonable costs of the Development and Resource Management Department.

110.3.8 Other Inspections. The Building Official may at his/her discretion require inspections of differing trades to be combined in proper chronological order consistent with construction practices to facilitate the use of combination inspection assignments.

112.1 Connection of Service Utilities. Utility connections shall not be permitted until compliance with the provisions of the Fresno Municipal Code as set herein. Electrical Meter: Electrical meters shall be required to be in place and operational prior to final electrical inspection to facilitate testing and acceptance of the entire system. Installation of devices, fixtures, and wiring shall be completed and in working order for testing purposes.

112.2.1 Construction Utilities. The Building Official may permit use of utilities for the purpose of construction provided no potential hazards to life or property is created and compliance with Article 590. CEC (Electrical) or Section 1208.0 CPC (Gas) is satisfied.

112.2 Temporary Power. The Building Official may permit use of utilities for temporary occupancy of a building or structure when circumstances exist to justify the issuance of a Temporary Certificate under Chapter 1 Section 111.3 of the CBC, and the owner enters into a security agreement with the City of Fresno, in a form approved by the Building Official, to insure completion of the required improvements. In addition, a deposit to secure such performance shall be made with the City of Fresno in an amount determined by the Building Official. The Building Official may, in his/her sole discretion, waive the requirement of a deposit.

Section 113 Board of Appeals Note. Note: For additional requirements refer to Section 10-50108 of the Fresno Fire Code as established by the City of Fresno Fire Department.

113.1. General. In order to hear and decide appeals of orders, decisions or determinations by the Building Official relative to the application and interpretation of the Fresno Building Code, there shall be and is hereby created a board of appeals (hereafter referred to as the "Building Standards Appeals Board") consisting of members who are qualified by experience and training to pass on matters pertaining to building construction and who are not employees of the City of Fresno. The Building Standards Appeals Board shall perform the following appeal duties:

a) Determine the suitability of alternate materials, engineering designs, methods of construction and equipment.

b) Provide reasonable interpretations of the provisions of the Fresno Building Code and other relevant codes.

c) Hear and decide appeals from the orders of the Building Officials directing the vacation, repair, rehabilitation or demolition of dangerous buildings under the provisions of Chapter 11, Article 3 of the Fresno Municipal Code as applicable to compliance to the provisions set forth in the Fresno Building Code and other relevant codes.

d) Hear and decide appeals pursuant to the provisions of Section 10-50108 of the Fresno Municipal Code.

e) Hear and decide appeals from orders of the Building Official directing the vacation, repair, rehabilitation or demolition of substandard buildings under the provisions of Chapter 11, Article 4 of the Fresno Municipal Code as applicable to compliance to the provisions set forth in the Fresno Building Code and other relevant codes.

The Building Official shall serve as an ex officio member of and shall act as secretary to said board but shall have no vote on any matter before the board. The Building Standards Appeals Board shall be appointed by the Mayor and shall hold office at the pleasure of the Mayor.

The Building Standards Appeals Board shall adopt rules of procedure for conducting its business, and shall render all decisions and findings in writing to the appellant with a duplicate copy to the Building Official.

113.2.1 Limitations of Authority. The Building Standards Appeals Board shall have no authority relative to interpretation of the administrative provisions of this code nor shall the board be empowered to waive requirements of this code.

114.4.1 Violations. The person, firm, or corporation violating any of the provisions of this code shall be deemed guilty of a misdemeanor.

CBC Chapter 9 Fire Protection Systems Note.

Note: For additional requirements refer to Fresno Fire Code Section as established by the City of Fresno Fire Department.

CBC Chapter 10

Section 1024 Luminous Egress Path Markings Note.

Note: For additional requirements refer to Section 10-51024 of the Fresno Fire Code as established by the City of Fresno Fire Department.

CBC Chapter 12

[1208.4] Efficiency dwelling units shall comply with the following:

1. The unit shall have a living room of not less than 150 square feet (13.9m 2) of floor area. An additional 100 square feet (9.3m 2) of floor area shall be provided for each occupant of such unit in excess of two.
2. The unit shall be provided with a separate closet.
3. The unit shall be provided with a kitchen sink, cooking appliance and refrigeration facilities, each having a clear working space of not less than 30 inches (762 mm) in front. Light and ventilation conforming to this code shall be provided.
4. The unit shall be provided with a separate bathroom containing a water closet, lavatory and bathtub or shower.

CBC Title 24 Appendix O104

Title 24 Appendix O104 of the California Building Code regarding Emergency Sleeping Cabins was in Section 11-102 of the Fresno Municipal Code to read:

A. General. Emergency sleeping cabins shall have an interior floor area of not less than 100 square feet (9.3 m 2) for a maximum of four occupants. Emergency sleeping cabins shall be limited to two occupants with an interior floor area of not less than 100 square feet (9.3 m 2) for the duration of any City-declared public health emergency. Where more than four persons occupy the cabin at any time, the required floor area shall be 70 square feet (6.5 m 2) for the first occupant and increased at the rate of 50 square feet (4.65 m 2) for each additional occupant. The interior floor area shall not exceed 400 square feet (37 m 2), excluding lofts.

B. Live loads. Emergency sleeping cabins shall be designed to resist intrusion of wind, rain, and to support the following live loads:

1. Floor live loads not less than 40 pounds per square foot (1.92 kPa) of floor area.

2. Horizontal live loads not less than 15 pounds per square foot (718 Pa) of vertical wall and roof area.

3. Roof live loads not less than 20 pounds per square foot (958 Pa) of horizontal roof area.

4. In areas where snow loads are greater than 20 pounds per square foot (958 Pa), the roof shall be designed and constructed to resist these additional loads.

C. Minimum ceiling height. Habitable space and hallways in emergency sleeping cabins shall have a ceiling height of not less than 80 inches (2,032 mm). Bathrooms, toilet rooms, and kitchens, if provided, shall have a ceiling height of not less than 76 inches (1,930 mm). Obstructions shall not extend below these minimum ceiling heights including beams, girders, ducts, lighting and other obstructions. Exception: Ceiling heights in lofts constructed in accordance with Section N108 are permitted to be less than 80 inches (2,032 mm).

D. Means of egress. Emergency sleeping cabins shall be provided with at least two forms of egress placed remotely from each other. One form of egress may be an egress window complying with Section 0104.4.1. When a loft is provided, one form of egress shall be an egress window complying with Section 0104.4.1, provided in the loft space.

E. Egress window. The bottom of the clear opening of the egress window shall not be more than 44 inches (1,118 mm) above the floor. The egress window shall have a minimum net clear opening height of 24 inches (610 mm), and a minimum net clear opening width of 20 inches (508 mm). The egress window shall have a minimum net clear opening area of five square feet (0.465 m 2).

F. Plumbing and gas service. If an emergency sleeping cabin contains plumbing or gas service, it shall comply with all applicable requirements of the California Plumbing Code and the California Mechanical Code.

G. Electrical. Emergency sleeping cabins shall be provided with all of the following installed in compliance with the California Electrical Code:

1. Continuous source of electricity. Exception: The source of electricity may be solar power or emergency generator.

2. At least one interior lighting fixture.

3. Electrical heating equipment listed for residential use and a dedicated receptacle outlet for the electrical heating equipment. Exception: Electrical heating equipment and a dedicated receptacle outlet for said equipment are not required if a nonelectrical source of heat is provided.

4. At least one GFCI-protected receptacle outlet for use by the occupant(s).

H. Ventilation. Emergency sleeping cabins shall be provided with means of ventilation (natural and/or mechanical) allowing for adequate air replacement, as determined by the enforcing agency.

I. Smoke alarms. Emergency sleeping cabins shall be provided with at least one smoke alarm installed in accordance with the California Residential Code, Section R314.

J. Carbon monoxide alarms. If an emergency sleeping cabin contains a fuel-burning appliance(s) or a fireplace(s), a carbon monoxide alarm shall be installed in accordance with the California Residential Code, Section R315.

Amendments to the California Mechanical Code

Amendments to the California Mechanical Code (CMC) per Section 11-106 of the Fresno Municipal Code are as follows:

CMC Chapter 9

936.0 Wood-burning Appliances

936.1 Definitions. Whenever the following terms are used in Section 933, they shall have the following meanings:

a) EPA shall mean the United States Environmental Protection Agency.

b) EPA CERTIFIED WOOD HEATER shall mean any wood heater that meets or exceeds combustion emissions standards set forth in the Code of Federal Regulations, Title 40, Part 60, 26 February 1988.

c) FIREPLACE shall mean any masonry or factory-built device to burn wood, composition fire logs, or other solid fuel, with or without a gas log or log lighter, which may have a firebox in excess of 20 cubic feet, which may weigh in excess of 800 kilograms, and which is not a pellet-fueled wood stove.

d) FIREPLACE INSERT shall mean a type of wood heater which is designed to be installed in the opening of a wood-burning fireplace and is connected to the chimney.

e) NEW CONSTRUCTION shall mean any construction or reconstruction or remodeling of any structure requiring the issuance of a building permit by the City of Fresno.

f) PELLET-FUELED WOOD STOVE shall mean any commercially manufactured enclosed combustion appliance that is designed to operate on automatically fed pelletized wood fuel and has a usable firebox volume of less than 20 cubic feet.

g) MANUFACTURED FIREPLACE shall mean any fireplace that is of unitary commercial manufacture and is not synthesized on site of masonry construction components.

h) STATE OF OREGON DEPARTMENT OF ENVIRONMENTAL QUALITY STANDARDS shall mean the performance and emission standards set forth in Sections 100 through 190 of Chapter 340, Division 21, Oregon Administrative Rules.

i) WOOD-BURNING APPLIANCE shall mean any device that is designed or used to burn wood, composition wood pellets, or composition fire logs for aesthetic, space heating, cooking, and/or water heating purposes within a structure; to include fireplaces, pellet-fueled wood stoves, and wood heaters.

j) WOOD HEATER shall mean a commercially-manufactured, enclosed wood-burning appliance that meets all the following criteria:

   1) A usable firebox volume of less than 20 cubic feet; and

   2) A maximum weight less than 800 kilograms, exclusive or chimney and other accessory devices that are not an integral part of the appliance; and

   3) A combustion air-to-fuel consumption ratio which averages less than 35-to-1, as determined by EPA certification test procedures set forth in code of Federal Regulations, Title 40, Part 60, 26 February 1988; and

   4) A minimum burn rate with less than five kilograms per hour fuel consumption, as determined by EPA certification test procedures set forth the Code of Federal Regulations, Title 40, Part 60, 26 February 1988.

936.1.1 All Wood-burning Appliances Prohibited in New Construction. Notwithstanding any other provision in the Fresno Municipal Code, no wood burning appliance, as defined herein, shall be installed in any new construction. This section shall not apply to any residential structure or dwelling unit having a lawfully installed wood burning appliance in place as of the effective date of this ordinance.

936.2 Installation of Wood-burning Appliances not permitted in Higher Density Residential Developments. Permits shall not be issued for wood-burning appliances to be installed in dwelling units of residential projects that have densities of more than 10.37 dwelling units per gross acre. However, one wood-burning appliance may be constructed or installed in each common-use recreation facility in these developments.

936.3 Wood-Burning Appliances Require Air Pollution Emissions Certification. Permits shall be issued only for replacement of existing wood burning appliances lawfully installed prior to the effective date of this ordinance and be issued only for those wood burning appliances certified by the U.S. Environmental Protection Agency (EPA) as meeting the EPA Phase I or Phase II emissions standards; or meeting equivalent State of Oregon Department of Environmental Quality Standards. Effective March 1, 1991, all wood burning appliances to be installed must be EPA-certified as at least meeting Phase II emissions standards. A permit shall only be issued for installation of a wood burning appliance when adequate EPA-approved documentation is provided to demonstrate that the wood burning appliance or fireplace stove model being installed has the appropriate emissions certification.

EXCEPTION: Those pellet-fueled wood stoves not affected by EPA's testing program under the Code of Federal Regulations Title 40, Part 60, Sub-installation by substituting independent, approved, nationally-recognized testing laboratory documentation showing that they emit less than 4.1 grams per hour of particulate matter.

936.4. Coal-burning Appliances Prohibited. No permit shall be issued to install any fireplace or domestic heating or cooking appliance that is designed and intended to use coal as combustion fuel.

936.5. Installation of Wood-burning Appliances Without Permits. Wood-burning appliances found to be installed on or after November 30, 1990, without required permit(s) shall be cause for an inspection/investigation fee to be charged to the property owner, pursuant to the Master Fee Resolution, and the issuance of a notice to abated (required permits secured, all work completed, and permit final inspection done) within sixty days of owner's receipt of the notice, 75% of the inspection/investigation fee shall be rebated.

If permit(s) were secured to abate the illegal installation, prior to discovery of the illegal installation by the City, no notice shall be issued nor inspection/investigation fee incurred unless the permit(s) to abate the nuisance are not finalized within 90 days.

Amendments to the California Plumbing Code

Amendments to the California Plumbing Code (CPC) per Section 11-106 of the Fresno Municipal Code are as follows:

CPC Chapter 6

604.0 Materials

604.1 Pipe, Tube, and Fittings. The third paragraph of section 604.1 of the California Plumbing Code is hereby deleted in its entirety and amended to read:

Materials for building water piping and building supply piping shall be in accordance with the applicable standards referenced in Table 604.1. Galvanized malleable iron, galvanized wrought iron or galvanized steel are prohibited materials for use both underground and in buildings.

Code Enforcement

The Code Enforcement Division enforces the City's Minimum Housing Code, which covers safety and livability requirements in housing by processing a variety of cases ranging from public nuisance to zoning. Code Enforcement has specialty teams as well as area teams that respond to complaints and possess specialized training to enforce violations.

The City of Fresno recently switched to a more proactive code enforcement system. They require all rental property owners to register in a public database and subject all units to a baseline inspection and regular follow ups thereafter. To promote quality neighborhoods and reporting of potential violations, the City of Fresno encourages residents to use the "FresGO" app and by calling 3-1-1, which allows residents to anonymously report issues, concerns, track requests, provide comments, and learn about city services. All complaints are addressed based on their priority level, with the most dangerous cases getting the most urgent response. The City of Fresno also created the "Quality Neighborhoods Guide" to provide residents with facts about City requirements and identifies the 15 most common violations, to encourage voluntary compliance among property owners.

The City works to bring code violation(s) to the attention of the responsible party, typically the property owner. A reasonable amount of time is provided to resolve the violation. Compliance at this stage is referred to as voluntary compliance. Voluntary compliance takes minimal City resources and is often achieved quickly because the property owner is responsive. In the case of unresponsive property owners, however, the City often takes enforcement action, using one or more of the following approaches to achieve compliance: Administrative Citations, Penalties, Abatement by Contractor, Court Appointed Receivership, Property Liens, Judicial Remedies, Referrals, etc.

Conclusion

Local amendments to the California Building Code, California Mechanical Code, and California Plumbing Code do not pose a significant constraint to the production of housing in the city.

Recommended Action

None needed.

Fees and Exactions

Analysis

Housing construction imposes certain short- and long-term costs upon local government, such as the cost of providing planning services and inspections. As a result, the City relies upon various planning and development fees to recoup costs and ensure that essential services and infrastructure are available when needed. In addition to local planning departments, developers must also work through the Air District, Water Districts, School District and sometimes Local Agency Formation Commissions (LAFCO) to obtain entitlements for construction of housing. Each additional Agency requirement adds cost to the project and ultimately the housing unit. The time necessary for processing these requirements also raises housing cost. Coordination and simultaneous processing among agencies should assist in reducing processing time and cost.

Planning and Development Fees

Typical City fees related to planning and development are summarized in **Table 1E-4.13** below. Fees are updated every July 1.

Table 1E-4.13: Fees for Residential Development as of July 1, 2022

Application Type	Fee
Addressing	
Assignment - Parcel Map	$248.47
Assignment – Tract Map first 50 lots or less	$528.01
Assignment – Tract Map per ea. Additional 50 lots or less	$207.43
Change of Address	$264.00
Annexations	
Inhabited	$13,653.836
Uninhabited	$10,137.49
Conditional Use Permit – Standard (1)(2)	
New Application/Full Review	$12,878.46
Amendment	$5,648.33
Major Revised Exhibit	$2,937.31
Moderate Revised Exhibit	$590.12
Minor Revised Exhibit	$207.43
Conditional Use Permit – Special (1) (2)	
Condominium Conversion – Base Fee	$24,825.13
Per 100 unit fee	$4,137.53
Development Permit (1)(2)	
New Application/Full Review	$11,730.38
Amendment	$7,447.54
Major Revised Exhibit	$2,937.31
Moderate Revised Exhibit	$590.12
Minor Revised Exhibit	$186.36
Plan Amendment (2)	
Plan Amendment – New application	$20,170.70
Plan Amendment & Rezone Combo	$22,239.46
Plan Mod – Change to plan in process	$5,596.19
Traffic Review	$163.00
Tentative Parcel Maps	
Technical Verification	$3,103.69
Credited to base fee upon acceptance	
Tentative Map (5 or more lots)	$8,275.04

Application Type	Fee
Tentative Parcel Map (4 or less lots)	$6,206.28
Traffic Review (Level 3)	$518.00
Traffic Review (Level 4)	$1,036.00
Fire Review	$134.00
Parks, Recreation & Community Review	$31.00
Revised Parcel Map – Major	$1,655.01
Revised Parcel Map – Minor	$827.50
Time Extension/Continuation at request of applicant	$2,068.76
Revised Conditions – Major	$2,482.51
Revised Conditions – Minor	$827.50
Tentative Tract Maps	
Technical Verification	$4,344.95
Credited to base fee upon acceptance	
Base Fee (per map)	$21,928.87
Lot Fee (per each 50 lots)	$8,275.04
Charged in addition to the Base Fee	
Traffic Review (Level 3)	$518.00
Traffic Review (Level 4)	$1,036.00
Fire Review (per review)	$134.00
Parks, Recreation & Community Review	$124.00
Revised Tentative Tract Map – Major	$12,412.57
Revised Tentative Tract Map – Minor	$4,137.53
Time Extension/Continuation of Scheduled Item (at the request of the applicant)	$5,586.21
Revised Conditions – Major	$2,482.51
Revised Conditions – Minor	$827.50

[1] *Fees listed are base amounts. Additional DP and CUP Application Review Fees and Environmental Review and Related Fees apply.*

[2] *Fees listed shall be reduced by 50% for applications in inner-City areas. In the Herndon Townsite, Highway City and Pinedale areas, fees shall only be reduced for residential uses and properties. No inner-City fee reduction will be applied to applications filed by government agencies.*

[3] *No additional environmental review fees shall be charged, unless it is determined that a higher level of review than an exemption is required.*

[4] *Fees are updated every July 1st based on CPI.*

Source: City of Fresno, 2022.

Urban Growth Management Fees

Urban Growth Management (UGM) fees apply to residential projects located on the geographic fringe of the city. The process is not intended to prevent development, but it does preclude inordinate costs to the City and limits disorganized growth. The process is specifically intended to ensure adequate municipal facilities, improvements, and services are available when needed, and to protect the city and its residents by minimizing costs.

Fee Exemptions and Reductions

To reduce some of the costs associated with residential development, the City offers various exemptions and reductions in fees. The City's Fee waiver program permits the exemption of development impact fees when a "small residential development" is replaced or reconstructed, if the development is substantially similar to the unit being replaced or reconstructed and the replacement or reconstruction does not significantly expand or intensify the use of the property. Applications for fee exemption must be submitted to the Director of Public Works. To incentivize infill development, the City reduces application fees by 50 percent on properties in the following core neighborhoods: existing neighborhoods south of Herndon Avenue, Bus Rapid Transit (BRT) corridors, and in the Downtown Planning Area. In Herndon Townsite, Highway City, and Pinedale areas, these reduced fees are limited to residential projects.

Typical Fees for Residential Projects

Development impact fees provide a mechanism for development projects to contribute financially to the cost of improving and expanding the infrastructure and facilities needed to accommodate that development. Fees are a one-time, non-recurring revenue source paid at the start of a development project, typically at building permit issuance. Although development fees help support vital local services to serve incoming residents, locally imposed fees for new residential projects can be a potential constraint as it can be an expensive component of development.

Table 1E-4.14 shows the assessed fees for three examples of typical residential developments, including a 90-lot single family subdivision, a 105-unit multifamily housing development in a new growth area, and a 42-unit multifamily housing development in an infill area. In addition to City fees, several regional fees are charged for development: Fresno Metropolitan Flood Control District, San Joaquin Valley Air Pollution Control District (SJVAPCD), Regional Transportation Mitigation and local school districts. For school fees, the Fresno Unified School District fees for residential construction is $4.79 per square foot (as of June 15, 2022); and the fees for Clovis Unified School District are $4.79 per square foot for level 1 residential construction such as residential additions/remodels and $5.36 per square foot for level 2 development including residential new construction and multi-family developments (as of July 1, 2022). Fees for the 90-lot single family subdivision total $2,315,746 ($25,731 per unit); fees for the 105-unit multi-family development total $1,934,333 ($18,422 per unit); and fees for the 42-unit multifamily infill development total $602,450 ($14,344 per unit).

Table 1E-4.14: Fees for Sample Residential Developments

Fee Project Type	Estimated Fee per Unit		
	90 Lot Single-Family Residential	Multi-family - Apartments (New Growth Area)	Multi-family - Apartments (Infill)
Total Number of Units	**90**	**105**	**42**
Entitlement Permit Processing	$ 38,455	$15,679	$ 9,722
Water Connection Charges	$547,698	$124,136	$58,873
Sewer Connection Charges	$319,320	$113,985	$ 0
Citywide/Regional Impact Fees			
Fire Facilities Impact Fee	$205,650	$183,015	$ 62,370
Park Facility Impact Fee	$320,940	$404,460	$ 132,594
Quimby Parkland Dedication Fee	$138,780	$ 0	$ 0
Citywide Regional Street Charge	$160,431	$121,083	$ 44,773
New Growth Area Major Street Charge	$366,135	$379,310	$ 0
Police Facilities Impact Fee	$85,320	$75,915	$ 20,328
Traffic Signal Mitigation Impact Fee	$68,580	$62,055	$ 15,228
Subtotal Citywide/Regional Impact Fees	**$980,121**	**$1,225,838**	**$275,293**
Fresno Metropolitan Flood Control District (Drainage Fees + Service Charges)	$243,801	$30,713	$12,000
School Fee	$ $185,789	$324,900	$177,000
San Joaquin Valley Air Pollution Control District (SJVAPCD)	$ 562	$562	$562
Regional Transportation Mitigation Fee	$ 190,620	$98,520	$69,000
Total	**$2,315,746**	**$1,934,333**	**$602,450**
Cost per Unit	**$25,731**	**$18,422**	**$14,344**

Source: City of Fresno, 2023.

Conclusion and Recommended Action

The City works to reduce fees to the extent feasible. Fees for entitlement permit processing constitute approximately 2 percent of the total costs. School and regional impact fees make up 20 to 25 percent of the total costs except for the infill example in which school and regional impact fees made up more of the total costs. Generally, fees do not serve to constrain housing development in Fresno. The City will continue to provide reduced application fees and priority processing for single-family and multi-family projects within the Inner City Fee Program area, as referenced in the Municipal Code, to create housing units in infill areas. In addition, the City will continue to offer impact fee waivers for qualifying infill projects in priority areas. As the City explores additional strategies to increase housing production, the City will consider the reduction or modification of fees.

Constraints on Housing for Persons with Disabilities

Persons with disabilities have a number of housing needs related to accessibility of dwelling units; access to transportation, employment, and commercial services; and alternative living arrangements that include on-site or nearby supportive living services. Government Code Section 65583(a) and (c) requires municipalities to analyze potential and actual constraints upon the development, maintenance, and improvement of housing for persons with disabilities, and demonstrate local efforts to remove governmental constraints that hinder the locality from meeting the need for housing for persons with disabilities. Cities are required to include programs that remove constraints and provide reasonable accommodation for housing designed for persons with disabilities.

Analysis

California Codes and Regulations

The City has adopted Title 24 of the California Code of Regulations, and the 2019 California Building Code. The 2022 codes are adopted and will be effective on January 1, 2023.

Definition of Family

There are a number of state and federal rules that govern the definition of family, including the Federal Fair Housing Amendments Act of 1988, the California Fair Housing and Employment Act, the California Supreme Court case City of Santa Barbara v. Adamson (1980), and the California Constitution privacy clauses. The laws surrounding the definition of family have a few primary purposes: to protect people with disabilities, to protect nontraditional families, and to protect privacy. According to HCD and Mental Health Advocacy Services, there are three major points to consider when writing a definition of family:

- Jurisdictions may not distinguish between related and unrelated individuals.
- The definition may not impose a numerical limit on the number of persons in a family.
- Land use restrictions for licensed group homes for six or fewer individuals must be the same as those for single families.

Although the City's Zoning Districts use "Single-Family" terminology, the Development Code does not define "family." Section 15-6702 of the Municipal Code references single-unit and multi-unit dwellings as the primary residential use classifications.

Residential Housing Types

Single-Unit Dwelling, Detached. A dwelling unit designed for occupancy by one household and located on a separate lot from any other unit (except second living units, where permitted). This classification includes individual manufactured housing units installed on a foundation system pursuant to Section 18551 of the California Health and Safety Code.

Single-Unit Dwelling, Attached. A dwelling unit designed for occupancy by one household, located on a single lot and typically grouped together in a row of similar units. They may be attached through common vertical party wall(s) to one or more dwellings on abutting lots, or may appear to be attached, but are structurally independent.

Multi-Unit Residential. Three or more dwelling units on a site or lot. Types of multiple unit dwellings include townhouses, garden apartments, senior housing developments, and multi-story apartment buildings. This use includes multi-unit development in which individual units are occupied exclusively by one or more persons 62 years of age or older.

The Housing includes a program to amend the City's zoning ordinance to address the definition of "family."

Reasonable Accommodation Procedure

Building and development standards may constrain the ability of persons with disabilities to live in housing units that are suited to their needs. The City is required to make reasonable accommodations in rules, policies, practices, and services when such accommodations may be necessary to afford a person with a disability the equal opportunity to use and enjoy a dwelling. Reasonable accommodation refers to flexibility in standards and policies to accommodate the needs of persons with disabilities. Per state law, a request for a reasonable accommodation may only be denied if:

- The individual on whose behalf the accommodation was requested is not an individual with a disability;
- There is no disability-related need for the requested accommodation (in other words, there is no connection between the disability and the requested accommodation);
- The requested accommodation would constitute a fundamental alteration of the services or operations of the person who is asked to provide the accommodation;
- The requested accommodation would impose an undue financial and administrative burden on the person who is asked to provide the accommodation; or
- The requested accommodation would constitute a direct threat to the health or safety of others (i.e., a significant risk of bodily harm) or would cause substantial physical damage to the property of others, and such risks cannot be sufficiently mitigated or eliminated by another reasonable accommodation.3

[3] California Code of Regulations, Title 2, § 12179.

The City's Reasonable Accommodation Ordinance is codified in Article 57 of the Development Code. A request for reasonable accommodation may be submitted on an application form provided by the City or be made orally to the Director. Additionally, the City is required to help assist the applicant in preparing the application if needed. Generally, an application for a reasonable accommodation shall be granted in 30 days. It is the responsibility of the Planning and Development Director (the "Director") under the Development Code to approve, conditionally approve, modify, or deny requests for deviations to dimensional requirements and requests for reasonable accommodation, pursuant to Article 56, Minor Deviations, and Article 57, Reasonable Accommodation for Housing. The following findings are required by the City:

- The housing, which is the subject of the request for reasonable accommodation, is to be used by an individual protected under fair housing laws;
- The requested accommodation is necessary to make specific housing available to an individual protected under fair housing laws;
- The requested accommodation does not impose an undue financial or administrative burden on the City; and
- The requested accommodation does not require a fundamental alteration in the nature of a City plan, policy, rule, regulation, or code.

Any denial of an application for reasonable accommodation may be appealed in accordance with Section 15-5017 of the Development Code. A Director decision may be appealed to the Planning Commission by filing a written appeal with the Director within 15 days of the decision being made. The appeal will be heard by the Planning Commission within 40 days from the date the appeal is filed.

Permits and Processing

The City does not impose special permit procedures or requirements that could impede the retrofitting of homes for accessibility. The City's requirements for building permits and inspections are the same as for other residential projects and are straightforward and not burdensome. City officials are not aware of any instance in which an applicant experienced delays or rejection of a retrofitting proposal for accessibility to persons with disabilities.

Universal Design Element and Retrofit Assistance

Since 2008, the City has implemented a Universal Design Ordinance to govern new construction or modifications of City-subsidized housing. The City defines "Universal Design" as a broader, more comprehensive "design for all" approach to the development of products, architecture, and environments around human diversity. Universal Design is a broad comprehensive house design that makes a home safe and comfortable for everyone, young or old, whether they have a disability or not. The program includes the following four items: 1) one "no step" entry, 2) accessible interior routes, 3) accessible kitchen counter space, and 4) ground floor facilities for units over 750 square feet in size. The City requires the incorporation of Universal Design features in affordable housing developments through a development agreement.

Conclusion and Recommended Action

The City's development standards do not unduly constrain housing for people with disabilities. Findings for reasonable accommodations are objective and the City continues to implement the Universal Design Ordinance to govern new construction or modifications of City-subsidized housing and provide accessible features in housing. Amendments to the City's zoning ordinance are required to address the definition of "family." The Housing Element includes a program to add a definition of family and consistently replace "single family" and "multi-family" terms with "single-unit" and "multi-unit" for internal consistency.

At-Risk Analysis

In the City of Fresno, there are more than 8,500 publicly assisted affordable housing units. Covenants and deed restrictions are the typical mechanisms used to maintain the affordability of these units. Over time, there is a risk of losing the affordable units due to the expiration of covenants and deed restrictions. As the housing market continues to put upward pressure on market rents in the Bay Area, San Joaquin Valley property owners could be inclined to convert the assisted units to market-rate housing or other use. While Fresno has a rich stock of publicly assisted housing, of the total stock, 695 units in 7 developments are at risk of conversion to uses other than low-income residential within 10 years from the Housing Element adoption deadline (i.e., by December 31, 2033). **Table 1E-4.15** provides an inventory of these assisted rental housing units and categorizes their level of conversion risk.

- 'Very-High' Risk – affordable homes that are at-risk of converting to market rate within the next year that do not have a known overlapping subsidy that would extend affordability and are not owned by a stable non-profit, mission-driven developer/owner.
- 'High' Risk – affordable homes that are at-risk of converting to market rate in the next 1-5 years that do not have a known overlapping subsidy that would extend affordability and are not owned by a stable non-profit, mission-driven developer/owner.
- 'Moderate' Risk – affordable homes that are at-risk of converting to market rate in the next 5-10 years that do not have a known overlapping subsidy that would extend affordability and are not owned by a stable non-profit, mission-driven developer/owner.
- 'Low' Risk – affordable homes that are at-risk of converting to market rate in 10+ years and/or are owned by a stable mission-driven non-profit developer/owner.

The California Housing Partnership considers at-risk homes to be those with 'Very-High' and 'High' risk levels. housing market conditions, all assisted housing developments at risk of conversion by December 31, 2033, are included in the at-risk analysis.

Table 1E-4.15: Assisted Housing Developments At-Risk of Conversion by 2033, City of Fresno

Name	Address	Affordable Units	Total Units	Active Program(s)	Estimated Affordability End Year/Date	Risk Level
Garland Gardens	3726 N. Pleasant Ave, Fresno, 93705	51	51	HUD	2025	Low
Delno Terrace	1480 N. Delno St, Fresno, 93728	60	61	HUD	2026	Low
Fresno Senior Housing aka Las Casitas Del Ser	156 South Willow Ave, Fresno, 93727	25	125	HCD	2027	Moderate
Lula Haynes Plaza	855 E. Lorena St, Fresno, 93706	46	46	HUD	2028	Moderate
Sierra Meadows	107 East Sierra Avenue, Fresno, 93710	44	220	CalHFA	2031	Moderate
Pleasant View Apartments	3513 N. Pleasant Ave, Fresno, 93705	60	60	HUD	2032	Low
Papillon Apartments	5464 North Figarden Drive, Fresno, 93722	27	132	CalHFA	2033	Low
Total	--	**313**	**695**	--	--	--

Source: California Housing Partnership Preservation Database, July 2022.

Preservation Options for At-Risk Properties

State law requires that housing elements include a comparison of the costs to replace the at-risk units through new construction or to preserve the at-risk units. Preserving at-risk units can be accomplished by facilitating a transfer of ownership to a qualified affordable housing organization, purchasing the affordability covenants, and/or providing rental assistance to tenants. Each of these options is described below.

Acquisition and Rehabilitation

Transferring ownership of an at-risk project to a non-profit housing provider would make the project eligible for re-financing using affordable housing financing programs, such as low-income housing tax credits and tax-exempt mortgage revenue bonds. These financing programs would ensure affordability for at least 55 years. Generally, rehabilitation accompanies a transfer of ownership. Actual acquisition costs depend on several variables such as condition, size, location, existing financing, and availability of financing (government and market). Based on listings of for-sale multifamily buildings throughout Fresno County, prices ranged from $72,916 per unit for a 48-unit complex building in Fresno to $300,000 per unit for a 15-unit complex. Additionally, if the property needs significant rehabilitation, or financing is difficult to obtain, it is important to consider these factors in the cost analysis. Assuming that renovations cost around $25,000 per unit, acquisition and rehabilitation costs could be between $68 million and $226 million for 695 units in 7 developments.

Construction of Replacement Units

New construction is often more expensive than acquisition and rehab. The cost of developing housing depends upon a variety of factors, including density, size of the units, location, land costs, and type of construction. According to a recent report from the Terner Center[4] in 2020, the estimated construction costs for new multifamily units are around $400,000 per unit. Based on this research, the total cost to replace the affordable units that are at-risk within the seven developments (313 units) with newly constructed units is estimated at $125 million.

Rent Subsidy

Rent subsidies can also be used to preserve affordability of housing, although there are limited funding sources to subsidize rents. The amount of a rent subsidy would be equal to the difference between the HUD-defined fair-market rent (FMR) for a unit and the cost that would be affordable to a lower-income household based on HUD income limits. **Table 1E-4.16** shows this calculation. The total cost to subsidize the 313 affordable units at-risk of conversion is estimated at $788,800 annually.

Another way rent subsidies could be structured is as a rent buy-down. This would involve the City providing a one-time assistance loan to the property owner to cover the present value of the decrease in rents associated with the extended affordability term compared with market rents achievable on the units. This approach offers a benefit to the owner in that they receive cash upfront from the loan, providing funds for rehabilitation improvements.

[4] Reid, Carolina. 2020. *The Costs of Affordable Housing Production: Insights from California's 9% Low-Income Housing Tax Credit Program.* Retrieved from: https://ternercenter.berkeley.edu/wp-content/uploads/2020/08/LIHTC_Construction_Costs_2020.pdf

Table 1E-4.16: Estimated Cost to Subsidize Rents, Fresno, 2022

	Per Unit Affordable Rent	Unit Size			Total
		1BR	2BR	3BR	
A	Low-Income Rent (60% AMI)	$904	$1,024	$1,144	
B	Very Low-Income Rent (50% AMI)	$753	$853	$954	
C	Average (A & B)	$828	$938	$1,049	
D	Per Unit Fair Market Rent[2]	$904	$1,137	$1,607	
E	Monthly Per Unit Subsidy (D–C)	$76	$199	$558	
F	Annual Subsidy/Unit (E * 12)	$911	$2,383	$6,695	
	Total "At Risk" Units[3]	**157**	**94**	**63**	**313**
	Total Annual Subsidy	**$ 143,027**	**$ 224,002**	**$ 421,785**	**$ 788,814**

[1] *Affordable rent calculation is based on 1.5 persons per bedroom.*

[2] *2022 HUD Fair Market Rent*

[3] *Actual unit size of at-risk units is unknown. Assumes 50% of total "At Risk" units are 1-bedroom, 30% are 2-bedroom, and 20% are 3-bedroom.*

AMI = Area Median Income

Source: U.S. HUD, Fair Market Rents, Fresno County, 2022.

SECTION 1E-5: REVIEW OF PAST ACCOMPLISHMENTS

State housing element law (Government Code Section 65588) requires cities and counties to assess the achievements under their adopted housing programs to inform the development of new programs. State law also requires that local governments review the effectiveness of the housing element goals, policies, and related actions to meet the community's special housing needs.

Major Accomplishments

The City has made significant progress in implementing the programs adopted in the 2013-2023 Housing Element. Some major accomplishments are listed below.

- Received Prohousing Designation status and now eligible or funding incentives and additional resources through state grant programs to speed the production of housing.
- Established a Local Housing Trust Fund with $6.5 million dedicated to date.
- Awarded $300,000 in funding from the Local Early Action Planning (LEAP) program to accelerate housing development by funding site and infrastructure plans for catalyst sites throughout the city.
- Provided $827,000 for mobile home rehabilitation. City also took over enforcement of mobile home parks including building permitting of new mobile home placement.
- Dedicated $170 million in neighborhood associated infrastructure improvements for 189 park, sewer, street, traffic, and water projects.
- Developed pre-approved accessory dwelling unit (ADU) home plans for residents to use free of charge.
- Created the Anti-displacement Task Force and hired Thrivance Group to study displacement in the city. Most recently prepared "Here to Stay: Displacement Avoidance Policy Report."
- Adopted a Lodging-to-Dwelling Conversion Ordinance and converted two hotels into apartments with many more projects in the works.
- Established a Rental Housing Registry and Rental Inspection Program. To date 86,350 rental units have registered, 13,375 inspections have been conducted, and numerous improvements to rental units have been completed.
- Established the School Area Code Enforcement Team to improve neighborhoods, reduce blight, enhance safety, equip residents for civic engagement, and connect low-income residents to housing resources. Reached 20 school areas and received an Innovative Program of the Year Award from California Association of Code Enforcement Officers.
- Between 2016 and 2019, 2,141 households received temporary shelter, 2,258 people received emergency shelter, 425 people received Rapid Re-housing assistance, and 231 clients with HIV/AIDS received Special Needs Housing Service.

- Between 2020 and 2021, 12,430 unsheltered persons received supportive services; 983 beds were added to the system; 4,812 unduplicated persons were assisted with overnight shelter, triage, or bridge housing; 5,243 people exited the system; and 1,687 people exited to permanent housing.

Progress Toward Meeting the RHNA

Each jurisdiction in California is responsible for accommodating its share of the region's housing needs. The process of determining each jurisdiction's share of housing needs is called the Regional Housing Needs Assessment (RHNA). The RHNA projection period for the previous Housing Element was from January 1, 2013 to December 1, 2023. The City of Fresno was assigned a RHNA of 23,565 units, divided into four income categories:

- Very Low-Income (less than 50 percent of the Area Median Income): 5,666 units
- Low-Income (50 to 80 percent of the Area Median Income): 3,289 units
- Moderate-Income (80 to 120 percent of the Area Median Income): 3,571 units
- Above Moderate-Income (greater than 120 percent of the Area Median Income): 11,039 units

Table 1E-5.1 summarizes the City's accomplishments in meeting the RHNA during the previous RHNA projection period.

Table 1E-5.1: Building Permits Issued During Fifth Cycle RHNA Period

Income Level	2013-2023 RHNA	2013-2015	2016	2017	2018	2019	2020	2021	2022	2023	Total to Date	Unmet RHNA
Very Low	**5,666**	290	23	-	135	41	68	92	67	311	1,027	4,639
Low	**3,289**	268	8	4	-	5		25	70	72	452	2,837
Moderate	**3,571**	384	334	787	-	-		11	0	-	**1,516**	2,055
Above Moderate	**11,039**	2,328	923	676	1,202	1,970	2,184	2,134	1,305	1,455	**12,722**	-
Total	23,565	3,270	1,288	1,467	1,337	2,016	2,252	2,262	1,442	**1,838**	17,172	9,531

**Note: Units serving extremely low-income households are included in the totals for very low-income permitted units.*

Source: City of Fresno, 2023 Annual Progress Report.

Program Evaluation

The following section reviews and evaluates the City's progress in implementing programs from the previous planning period. As part of analyzing prior programs, the City must assess the effectiveness of programs for special needs populations. **Table 1E-5.2** summarizes progress on the implementation programs from the previous Housing Element, including programs addressing special needs populations summarized below.

Seniors and Persons with Disabilities. As discussed in Section 1E-0: Summary of Needs for the City of Fresno, about 11 percent of the population in Fresno was aged 65 or older in 2020. In the same year, nearly half of the senior population (44.5) percent had a disability. Due to proximity to services, Fresno has a higher rate of residents with disabilities than the county as a whole (13.8 percent compared to 12.9 percent across the county). Seniors and persons with disabilities are especially likely to live on fixed incomes and require accessibility modifications to homes to support mobility and independent living. The City implemented programs to support seniors and special needs households, including Program 7 – Special Needs Housing, Program 10A – Mobile Home Parks, Program 10B – Housing Choice Vouchers, Program 21 – Neighborhood Infrastructure, and Program 22 – Housing Rehabilitation. The City continues to encourage and support development of senior housing and senior residential care facilities that offer a wide range of housing choices and community services. The City also implements a Universal Design Ordinance for new construction or modification of City-subsidized housing using aging in place as a guiding principle (Program 7). The program includes: one "no step" entry, accessible interior routes, accessible kitchen counter spaces, and ground-floor facilities for units over 750 square feet in size. Any developer receiving City funds is required to comply with the Universal Housing Ordinance. Every development project that has received City funds since the Ordinance was adopted has complied with this requirement.

The City also funds home repair and rehabilitation programs with its Community Development Block Grant (CDBG) and HOME Investment Partnership Act (HOME) funding. The City offers a Senior Paint Program in which CDBG funds are used to pay for a licensed contractor to paint home exteriors, occasionally providing minor repairs (e.g., screens, broken windowpanes, loose or damaged gutters) as funds are available. The program serves low-income seniors who own and occupy their home. During the previous planning period, more than 100 projects were completed through the City's Senior Paint Program. However, home repairs continue to be a need throughout the city, particularly for senior occupied households. Stakeholders and public meeting participants involved in the Housing Element update process identified various remaining needs including mobile home improvements, particularly accessibility accommodations, weatherization, and roof repairs for seniors. The City has allocated $553,717 of its Permanent Local Housing Allocation (PLHA) funding for a total of $1.38 million in PLHA assistance to further its program focused on owner-occupied home rehabilitation for low-income people not eligible for funding through other programs, such as mobile home residents. Once the City receives its executed Standard Agreements for PLHA funds from the State of California, it will implement the program (refer to Program 22 for more information).

The City has also worked to increase the availability of affordable housing in the city by using HOME funds to support the development of affordable housing, including housing for seniors and people with disabilities, and to provide housing rehabilitation for low-income homeowners. Senior housing developments completed/underway during the previous planning period included Self-Help Enterprises Annadale Commons Senior Housing Project in Southwest Fresno (40 new multi-family senior housing units), FCTC Fancher Creek Senior Housing Project (180 new multi-family senior housing units); and Cesar Chavez Foundation's Las Palmas de Sal Gonzales Sr. Apartments Project located at 5070 E. Kings Canyon (mix of 135 senior and multi-family units).

Fresno residents with disabilities are served by the Fresno County Senior Resource Center, which operates an Adult Protective Services program, assisting both disabled adults and seniors with all requests for assistance. The Fresno County Human Services System Department of Adult Services also provides housing and basic needs assistance to elderly persons. The Fresno/Madera Area Agency on Aging (FMAAA) provides connections to programs, services, and resources elderly residents can use to maintain and improve their quality of life as they age. For seniors and other persons requiring a supportive housing setting, there are 210 licensed care facilities in Fresno County with 4,953 beds. The majority of these facilities are located in the City of Fresno, with some 67 facilities in the City of Clovis, one in the cities of Fowler, Huron and Kerman, three in the City of Reedley, and three in the City of Sanger. Furthermore, the Housing Authority provides rental assistance to eligible seniors and disabled residents through housing choice vouchers and project-based vouchers. Of the Housing Authority's 7,412 vouchers (as of July 2023), 8 percent were used by a senior household and 19 percent were used by households with a disabled member. With both new housing and rental vouchers, housing needs for seniors and disabled people continue to be addressed, however 7,571 individuals are on the interest list for vouchers and public housing.

Program Effectiveness: During the 5th Cycle, the programs described above served 355 households with new accessible affordable housing, 100 households with home rehabilitation, and provided 2001 HCV to senior households and households with a disabled member. Some households may have been served by the supportive housing available depending on cost. While the services and housing made available during the 5th cycle were effective in serving the targeted populations, data indicates that the needs still exceed the available resources. The following programs in this housing element aim to address more of the need and will depend on resource availability (both public and private) to be effective:

- **Program 2** – Variety of Housing Opportunities in High Resource Areas-
- **Program 3** – Encourage and Facilitate Accessory Dwelling Units and Small Homes
- **Program 19** – Home Buyer Assistance
- **Program 20** – Housing Choice Voucher Incentive Program
- **Program 22** – Housing Rehabilitation
- **Program 24** – Special Needs Housing
- **Program 26** – Fair Housing Services
- **Program 33** – Mobile Home Parks
- **Program 34** – Eviction Protection Program
- **Program 37** – At-Risk Housing

Persons with Developmental Disabilities. Living arrangements for disabled persons depend on the severity of the disability. If a disability prevents an individual from working or limits income, then the cost of housing and the costs of modifications are likely to be even more challenging. For this reason, many persons live independently or with other family members. To maintain independent living, disabled persons may need special housing design features, income support, and in-home supportive services for persons with medical conditions. Special design and other considerations for persons with disabilities include single-level units, availability of services, group living opportunities, and proximity to transit. Stakeholders and public meeting participants in the 2020 Analysis of Impediments process highlighted the need for housing for people with developmental disabilities stating that affordability, safety, and landlords who understand their clients are important because it is difficult to obtain housing for this group and evictions are common. For people with developmental disabilities, safety is a key factor and varies from neighborhood to neighborhood even within the same area of the city. The Analysis of Impediments recommended the provision of more disabled-accessible units and housing for persons with mental and physical disabilities. The City of Fresno, along with other jurisdictions in the County, is serviced by the Fresno Center, which provides one point of entry to services for people with developmental disabilities. The Fresno center partners with the Central Valley Regional Center to help individuals with developmental disabilities. Central Valley Regional Center advocates for clients with developmental disabilities and consults with attorneys regularly on legal issues.

Program Effectiveness: Many of the programs available for seniors and individuals with disabilities also support individuals with developmental disabilities. In order to address more of the need, more financial resources are needed. The following programs in this housing element aim to address more of the need and will depend on resource availability (both public and private) to be effective:

- **Program 2** – Variety of Housing Opportunities in High Resource Areas
- **Program 3** – Encourage and Facilitate Accessory Dwelling Units and Small Homes
- **Program 19** – Home Buyer Assistance
- **Program 20** – Housing Choice Voucher Incentive Program
- **Program 22** – Housing Rehabilitation
- **Program 24** – Special Needs Housing
- **Program 26** – Fair Housing Services
- **Program 33** – Mobile Home Parks
- **Program 34** – Eviction Protection Program
- **Program 37** – At-Risk Housing

Large Households. Homes consisting of five or more members residing together typically lack adequately sized and affordable housing options. Approximately 17 percent of all households in Fresno have 5 or more members (28,411 households), as of 2020. This consists of 13,282 owner-occupied large households and 15,129 renter-occupied large households. The most critical housing need of large households is access to larger housing units with three or more bedrooms. According to estimates from the U.S. Census American Community Survey (ACS), of the 170,137 housing units in the city as of 2020, approximately 68,131 units have at least three bedrooms and an additional 29,738 units have more than four bedrooms. Among these larger units, 69.4 percent are owner occupied (67,935 units) and 30.6 percent are renter occupied (29,934 units).[1] Based on this data, the City concludes that there is a sufficient availability of units suitable for large family households. However, large households would also benefit from the additional development of affordable rental multi-family units with three or more bedrooms. During the previous Housing Element cycle, the City and Housing Authority of the City of Fresno investigated funding sources, developed partnerships, and applied for available local, State, and federal funds to assist in the production of large family units.

Program Effectiveness: While the data indicates that Fresno's housing stock can accommodate the number of large households in Fresno, data shows a lack of affordable housing for this population. In response to these needs, the City is including Program 24, which seeks to apply additional funding sources for a variety of housing types for special needs groups, including large households. Other programs that could support the provision of affordable housing for large households include the following:

- **Program 2** – Variety of Housing Opportunities in High Resource Areas
- **Program 12** – Local Housing Trust Fund
- **Program 13** – Pursue State and Federal Funding Sources for Housing Development
- **Program 14** – Partnerships with Affordable Housing Developers
- **Program 19** – Home Buyer Assistance
- **Program 20** – Housing Choice Voucher Incentive Program
- **Program 26** – Fair Housing Services
- **Program 34** – Eviction Protection Program
- **Program 37** – At-Risk Housing

[1] Source: U.S. Census Bureau, ACS 16-20 (5-year Estimates), Table B25042.

Single Female-Headed Households. Many single parent households, especially female-headed households, have a greater risk of poverty due to higher family expenses and single-wage incomes. Given the availability of jobs, transit, housing, educational facilities and other services, Fresno has a greater presence of single female-headed households than other cities in the county, except Clovis. As discussed in Section 1E-0: Summary of Needs for the City of Fresno, nearly 31 percent of households in Fresno had single female heads of household in 2020. Additionally, 36 percent of single-female-headed households in Fresno were living under the poverty level (11,582 households). Single-parent households can benefit from most affordable housing programs, including Housing Choice Vouchers (Program 10B), the Homebuyer Assistance Program (Program 8), and the Housing Rehabilitation Program (Program 22). The City offers information on these programs on their website and refers individuals when queried. Assistance programs offered by organizations like First Five Fresno County can also assist these households with securing affordable childcare and housing.

Program Effectiveness: Although the City passed several amendments to the zoning code to encourage the development of more affordable housing near transit and employment centers during the previous planning period, there still had not been enough new development to support the need. However since passage of the zoning code amendment to remove mixed use density caps along transit corridors in 2022, several affordable housing projects in the downtown and along transit corridors have been constructed or are in the pipeline. The City will continue to incentivize this type of development and provide available resources to single parent households as available and while encouraging affordable housing in high opportunity neighborhoods. Programs that could support housing for single female-headed households include the following:

- **Program 2** – Variety of Housing Opportunities in High Resource Areas
- **Program 11** – Incentives for Housing Development
- **Program 12** – Local Housing Trust Fund
- **Program 13** – Pursue State and Federal Funding Sources for Housing Development
- **Program 14** – Partnerships with Affordable Housing Developers
- **Program 19** – Home Buyer Assistance
- **Program 20** – Housing Choice Voucher Incentive Program
- **Program 24** – Special Needs Housing
- **Program 25** – Development Code Amendments for Compliance with State Law and to Reduce Barriers to Housing Development

Farm Workers. Farmworkers living in urban and suburban areas often have similar needs for affordable rental housing as other lower-wage earners. Due to a combination of limited English language skills and very low household incomes, the ability to obtain housing loans for home purchase is extremely limited. For the same reasons, rentals are also difficult to obtain although farmworkers are more likely to be renters. Research suggests that farmworkers generally experience overcrowded and substandard, potentially hazardous, housing conditions.

As a result, needs are generally accommodated through housing programs and policies that assist low- and very low-income households such as the HCV program (Program 10B) and the Housing Rehabilitation Program (Program 22). In addition, the Fresno Housing Authority manages 194 units of seasonal farmworker housing for migrant workers and 131 units in three year-round housing complexes, exclusively for farm laborers. The City has a relatively small population of farmworkers compared to other jurisdictions in the county but will continue to support regional efforts to provide seasonal and permanent housing facilities for farmworkers.

Program Effectiveness: In the prior planning period, City staff were to conduct a review of the Development Code to verify compliance with the California Employee Housing Act regarding housing for agricultural employees. The Agricultural Employee Housing (AEH) Act was reviewed and no changes to the Development Code were found to be necessary, however the City finds that it can provide clarification between the Code and State Law. In terms of effectiveness in meeting farmworker housing needs, the City did not have access to localized data in the prior period, however the City will be more proactive in reaching out to Fresno Housing and others working to address farmworker housing needs moving forward. This has already started to occur, as the City has applied for Rural Housing Services funding through the US Department of Agriculture for a 54-unit deed restricted farmworker housing project on City-owned land at Ventura and 7th. This Housing Element includes a program to permit employee housing for six or fewer as a residential use and permit agricultural labor housing in all zoning districts where agricultural uses are permitted (Program 25 – Development Code Amendments for Compliance with State Law and to Reduce Barriers to Housing Development). In addition to Program 25, programs that could support housing for farmworkers include the following:

- **Program 2** – Variety of Housing Opportunities in High Resource Areas
- **Program 3** – Encourage and Facilitate Accessory Dwelling Units
- **Program 11** – Incentives for Housing Development
- **Program 19** – Home Buyer Assistance
- **Program 20** – Housing Choice Voucher Incentive Program
- **Program 22** – Housing Rehabilitation
- **Program 24** – Special Needs Housing
- **Program 25** – Development Code Amendments for Compliance with State Law and to Reduce Barriers to Housing Development
- **Program 26** – Fair Housing Services
- **Program 33** – Mobile Home Parks

Homeless. Without sufficient protections and affordable housing options, many low-income renters are at risk of experiencing homelessness. The 2023 Point-in-Time (PIT) count estimated that 3,207 persons were experiencing homelessness in the city of Fresno at the time of the count. It is estimated that approximately 1,819 of those residents were unsheltered, representing a 7 percent increase in the unsheltered homeless population in Fresno. The City of Fresno collaborates with service agencies dedicated to providing shelter, housing, and case management services to those in need (Program 9). In addition to coordination at the local level, Fresno has received technical assistance and, in some cases, has been designated a high-priority city as part of initiatives aimed at preventing and ending homelessness.

Between July 2019 and December 2021, the Fresno area received more than $144 million from federal, state, and local sources to increase homelessness services. In 2023, funding that has been allocated to the City in addition to annual funding from HUD's Community Planning and Development Office includes: Homeless Housing, Assistance, and Prevention (HHAP) Round 1, in the amount of $6,158,246; HHAP Round 2, in the amount of $2,911,171; HHAP Round 3, in the amount of $7,524,257; and an initial disbursement of $5,632,712 from HHAP Round 4. Using state and/or federal emergency funding, the City funded the operations of multiple homeless shelters: Mental Health Systems Triage Center at the Hacienda; Turning Point of Central California's Golden State Triage Center, Bridge Point Triage Center, Step Up on 99, and Journey Home at Welcome Inn; Sage Commons; and Elevate Community Service's Villa, Ambassador, and Travel Inn Triage Centers. In 2023, the City's federally funded programs, designed to assist people experiencing homelessness, assisted 2,464 people with emergency shelter; 269 people with tenant-based rental assistance or rapid rehousing; and 2,837 people with public service activities like street outreach, tenant and landlord counseling, and referral and housing services (all unduplicated). These funds went to the City, the County, the Fresno Madera Continuum of Care, and the Fresno Housing Authority. The City used its funding allocation to add 983 shelter beds and provide emergency and temporary shelter, and transitional housing.

In an effort to provide "housing-first" opportunities for the unsheltered population, the City of Fresno recently approved $1 million in HOME Investment Opportunities (HOME) Investment Partnerships Program funds to be directed to the Fresno Housing Authority for the formation of a local Tenant Based Rental Assistance (TBRA) program. The need to provide assistance for the homeless and those at risk of becoming homeless through safe low-barrier shelter options, housing-first collaborations, and associated supportive services was a priority area identified in the 2020-2024 Consolidated Plan, and in 2022, activities were funded to work toward alleviating housing instability and homelessness for the people of Fresno.

Program Effectiveness: The 2023 Point-in-Time count estimated that 3,207 persons were experiencing homelessness in the city of Fresno at the time of the count. It is estimated that approximately 1,819 of those residents were unsheltered, representing a 7 percent increase in the unsheltered homeless population in Fresno. The City used its funding allocation to add 983 shelter beds and provide emergency and temporary shelter, and transitional housing, and 40 units of permanent supportive housing. The program was effective in serving the target population, however the need exceeds the resources available. To prevent displacement and homelessness in the City of Fresno, the City has included

- **Programs 32 -** Opportunity to Purchase Act
- **Program 33** – Mobile Home Parks
- **Program 35** – Replacement Units
- **Program 36** – Homeless Assistance
- **Program 37** – At Risk Housing

Table 1E-5.2: Evaluation of Fresno 2015-2023 Housing Element Implementation Measures

	Program Summary	Progress Evaluation	Recommendation
1	**Adequate Sites to meet 2013-2023 RHNA and to meet 2008-2013 RHNA.** The City will maintain an inventory of available sites for residential development and provide it to prospective residential developers upon request. The City of Fresno is not responsible for the actual construction of these units. The City is, however, responsible for creating a regulatory environment in which the private market could build these units. This includes the creation, adoption, and implementation of General Plan policies, zoning and development standards, and/or incentives to encourage the construction of various types of units.	The City is maintaining, on an ongoing basis, an inventory status report of all Housing Element Inventory Sites. The inventory status report is available to City staff to address current planning projects for consistency with the Housing Element. As of December 31, 2023, the City of Fresno has a surplus of capacity in all income categories for the 2013-2023 RHNA. See evaluation of Program 2 for more discussion on adequate sites.	Continue to maintain an inventory of available sites for residential development.
2	**Residential Densities on Identified Sites.** The City of Fresno will evaluate residential development proposals for consistency with goals and policies of the General Plan and both (2008-2013 and 2013-2023) Housing Element Sites Inventories to ensure development on identified sites is occurring as expected related to development types, densities, and quantities. Should a project propose a reduction in density, the City shall make written findings that the density reduction is consistent with the General Plan and that the remaining sites identified in the Housing Element are adequate to accommodate the RHNA. So long as the residential sites inventory continues to exceed the City's RHNA as set forth in Program 1, the City shall make the necessary written findings regarding the reduction's consistency with the General Plan. If a proposed reduction of residential density will result in the residential sites inventory failing to accommodate the RHNA, the City shall consider an amendment to the Housing Element in order to restore capacity to the sites inventory, before acting on a density	In 2016, the City established procedures for the review and monitoring of sites identified in the Housing Element sites inventory. During the entitlement review process, new projects are evaluated for their consistency with General Plan housing objectives and RHNA obligations. In 2018, the City began integrating Policy and Procedure No. G005 - Housing Element Sites Inventory Entitlement Review Process Procedure with Accela, the City's new land management system. Several development projects have requested reduced densities during the 2013-2023 Housing Element cycle and most were found to be consistent with the General Plan and included an assessment of the Housing Sites Inventory capacity. In 2019, the projects that proposed a reduction in density were found to impact the capacity of the 2008-2013 Housing Sites Inventory so in order to restore adequate capacity, the City Council adopted Plan Amendment P19-00980 to add 91 sites in Downtown (approximately 54.16 acres) for an estimated 9,374 units to the 2008-2013 Inventory. In subsequent years, the projects that proposed a reduction in density were found in writing to be consistent with the General Plan and included an assessment of the Housing Sites Inventory capacity. Consistency was maintained because the inventory currently has a	Continue to implement the Housing Element Sites Inventory Entitlement Review Process Procedure to ensure development on identified sites is occurring as expected related to development types, densities, and quantities. Combine with Program 1, above.

Program Summary		Progress Evaluation	Recommendation
	reduction. Sites selected to restore capacity to the inventory shall provide equivalent capacity, be of an equivalent size, and provide appropriate density relative to the site subject to the density reduction in order to qualify as a sufficient replacement site. If a site requires a rezone in order to be counted as a replacement site in the sites inventory, the rezone application shall be processed concurrently with the Housing Element amendment. As part of this process, the City will encourage and support the expansion of affordable housing opportunities that prevent the concentration of single-family and multifamily dwelling units affordable to low- and moderate-income households and will consider concentration of affordable housing when selecting replacement sites for the inventory.	surplus of adequate sites identified in the Housing Element to meet its RHNA obligations.	
3	**Annual Reporting Program.** Partner with housing advocates, organizations, and developers to provide annual information to the community on housing density and affordable housing. Actively work toward Housing Element implementation, and reach out to the community regarding these topics annually as part of a Housing Element Annual Report on annual progress. Notify and invite interested community members to attend and discuss housing production progress at a public hearing, and continue to provide avenues for community input on the implementation of the Housing Element. Utilize multiple methods of outreach to engage all members of the Fresno community, including multilingual notices and media outlets. Encourage input on other housing and fair housing-related programs and policies maintained by the City, including but not limited to those contained in the Analysis of Impediments to Fair Housing Choice (or Assessment of Fair Housing) and relevant General Plan policies and Development Code provisions. Allow residents	The City devotes considerable effort to engage housing advocates, stakeholders, and organizations on housing-related programs and policies maintained by the City. Fresno has a Housing and Community Development Commission (HCDC) that helps facilitate annual evaluations and the City also completes Housing Element Annual Progress Reports (APR). The City facilitates public workshops for stakeholders and interested parties to present accomplishments and receive public feedback on: affordable housing development in Fresno, future actions/assistance the City could provide, the impact of State laws, and other City housing-related programs and policies. Community meetings are promoted through the Fresno Bee, Vida en el Valle, social media, utility bill inserts, email, media outlets, flyer distributions at schools, door-to-door canvassing, local events, neighborhood meetings, food distributions, and congregations. In March 2020, the process went digital due to COVID-19. Meetings often include Spanish and Hmong interpretation and most recently (2022) Punjabi. Draft plans and materials are made available via the City's website or printed in the City Clerk's office, the Code Enforcement public counter, and in all of the public libraries.	Continue Program.

	Program Summary	Progress Evaluation	Recommendation
	and stakeholders the opportunity to discuss and provide information and feedback to City staff and policy-makers.		
4	**Density Bonus Programs.** The City will encourage use of the State Affordable Housing Density Bonus and City of Fresno TOD Height and Density Bonus provisions through technical assistance and information dissemination.	During the pre-application process for entitlements the City meets with applicants to provide assistance. Projects that are eligible for density bonuses are informed of the State Density Bonus and City of Fresno Transit Oriented Development (TOD) Height and Density Bonus (which can be combined with a State density bonus for affordable housing). Approximately 22 projects have claimed a Density Bonus in Fresno between 2016 and 2022.	Maintain program and monitor legislative updates to State Density Bonus law.
5	**Housing Funding Sources.** The City will actively pursue funding to assist in the development, preservation, and rehabilitation of any housing type with a particular emphasis on the development of mixed-income neighborhoods. The City will identify these funding opportunities to both for-profit and non-profit developers as part of the residential and mixed-use development processes, especially those projects that have the potential for affordable housing. The City will also continue to assist Low Income Housing Tax Credit (LIHTC) applications and Affordable Housing and Sustainable Communities (AHSC)/Cap and Trade applications. The actions that the City will take specifically include, but are not necessarily limited to:	The City primarily receives funding through annual entitlement programs administered by the Department of Housing and Urban Development (HUD) and the California Department of Housing and Community Development (HCD). However, in 2021 the City established a local housing trust fund (LHTF) to establish a local source of funding for various community-supported housing programs and activities. In 2022, the City received $6.8 million through the Community Development Block Grant (CDBG) Program, $603,908 through the Emergency Solutions Grant (ESG) Program, $3.6 million through the HOME Program, and $875,943 through the Housing Opportunities for People with AIDS/HIV (HOPWA) Program. The City's administration also allocated $42 million of its funding through the American Rescue Plan Act (ARPA) for the development of affordable housing. For more information about how this funding was used, refer to Programs 6 and 7. The City has also been awarded entitlement grants from the California Department of Housing and Community Development. In 2022, it was awarded $54 million through Homekey 2 to fund projects to sustain and rapidly expand housing for people experiencing homelessness or at risk of homelessness. The City also submitted a joint application with RH Community Builders and UpHoldings and were awarded $16.7 million in Homekey 2 funds from the State of California to acquire and convert motels into affordable housing. The City was also awarded $5 million through the State of California's Encampment Resolution Fund Program. Funds are used to provide street outreach to people experiencing homelessness in encampments within a specified area	Maintain program.

	Program Summary	Progress Evaluation	Recommendation
		downtown. The funds are also used to provide shelter operations to house individuals identified in the encampment and will be used to acquire tiny houses to add 26 permanent housing units. The City also applied for a fourth allocation of the Homeless Housing Assistance and Prevention (HHAP) Program totaling $11 million and for its third allocation of the Permanent Local Housing Allocation (PLHA) Program totaling $5.8 million.	
6	**Strengthening Partnerships with Affordable Housing Developers.** The City will continue to strengthen partnerships and relationships with affordable housing developers, including but not limited to the Fresno Housing Authority, by doing the following: Encouraging and assisting in funding applications to applicable federal, State, and local funding sources Supporting local capacity building efforts around affordable housing finance, including convening affordable housing developers, community development leaders, lenders, and advocates to identify ongoing regulatory and funding barriers to affordable and mixed-income development Attracting large investors to facilitate the construction of new affordable housing units and incentivize self-help type single-family housing construction for extremely low-income households Reviewing published notices for funding availability and causing applications to be prepared for various City housing programs, projects, and activities Administering Community Housing Development Organization (CHDO) funds for affordable housing projects with service providers including Habitat for Humanity	The City actively collaborates with affordable housing developers to fund and build affordable housing. During the previous planning period, the City worked closely with the Fresno Housing Authority, Self Help Enterprises, and Habitat for Humanity. Staff provide frequent communication with partners about Federal, State, and local funding sources, and continue to assist developers applying for Low Income Housing Tax Credits (LIHTC) by reviewing applications, evaluating possible leveraging with local programs, and submitting letters of support and certifications of consistency with the Consolidated Plan. In 2018 and 2019, the City provided assistance to five projects–Mariposa Meadows, Annadale Commons, Renaissance at Cincotta, Econo Inn, and Fancher Creek Senior Housing. Also in 2019, the City of Fresno collaborated with Self Help Enterprises, the Fresno Housing Authority, and Habitat for Humanity to use HOME funding for three residential projects. • Self-Help Enterprises' Annadale Commons Phase II in the amount of $1,462,000 for 35 single-family houses • Fresno Housing Authority's Chinatown Housing Project in the amount of $397,118 for 57 multi-family housing units, and • Habitat for Humanity's Central Lots Project Phase II in the amount of $392,000 for two single-family houses. The City is currently working in collaboration on the Fancher Creek Master Planned Development, a 90-acre project in Southeast Fresno that would consist of 970,000 square feet of commercial and retail businesses, a senior housing development, a multifamily housing development, a plaza, recreational space, and approximately 1.5 miles of trail along the canal. The City is currently (2023) in financing negotiations.	Maintain program. Explore opportunities for affordable housing in higher opportunity areas.

	Program Summary	Progress Evaluation	Recommendation
	Encouraging non-profit organizations to seek funding for development of new farmworker housing projects, as well as local affordable housing and mixed-income projects in transit-oriented developments along transit corridors throughout the City	To attract more investors and increase the availability of housing, the City offers development incentives in the form of TOD height and density bonuses, which can be combined with the State density bonus for affordable housing. Most recently the City removed maximum densities in Downtown and Mixed-Use zoning districts to streamline higher density development.	
7	**Special Needs Housing.** The City will continue to encourage the development of adequate housing to meet the needs of persons with special needs (such as seniors, survivors of domestic violence, and people with disabilities, including persons with developmental disabilities), including the following efforts: The City will continue implementation of its Universal Design Ordinance for new construction or modification of City-subsidized housing using visitability and aging in place as guiding principles. The program includes: • One "no step" entry • Accessible interior routes • Accessible kitchen counter space • Ground-floor facilities for units over 750 square feet in size The City will partner with and encourage local and State non-profits to seek funding for development of new farmworker housing projects. The City will use funding programs such as the Emergency Shelter Grant (ESG) and Housing Opportunities for Persons with HIV/AIDS (HOPWA) to support needed social services and review applications annually. The City will continue to utilize available funds and/or seek funding to support the Fresno-Madera Continuum of Care, a local collaborative of	The City uses many programs and funding sources to address special needs housing. Activities undertaken with CDBG, HOME, ESG, HOPWA, and City General Funds include efforts to reduce poverty and improve the quality of life for residents. The City's ESG and HOPWA funds provide direct assistance to homeless individuals or those at risk of becoming homeless. From July 1, 2021 to June 30, 2022, annual HUD entitlement funds of $603,908 in ESG and $875,943 in HOPWA were awarded to subrecipients who provided 2,591 people with emergency shelter and street outreach services; 610 people with supportive, referral, and housing services; 17 people with homelessness prevention; and 195 people with rapid rehousing, short-term rent, tenant-based rental assistance, or housing through short-term or transitional facilities (all unduplicated).	Maintain program.

	Program Summary	Progress Evaluation	Recommendation
	homeless service providers, to construct transitional and supportive housing units. The City will provide technical assistance to developers with proposed Single Room Occupancy (SRO) projects to create units during the plan period. The City and Housing Authority of the City of Fresno will investigate funding sources, develop partnerships, and apply for available local, State, and federal funds to assist in the production of large family units. The City and Housing Authority of the City of Fresno will seek and apply to funding sources and partner with local and statewide non-profits and for-profits in applying for funds and encouraging the construction of units for extremely low-, very low-, and low-income income seniors (typically age 65 years and over; may vary by funding source or program).		
8	**Home Buyer Assistance.** The City of Fresno administers a first-time homebuyer program that provides up to $50,000 as a silent second loan to an eligible homebuyer. The program helps low-income households purchase their first home in qualified census tracts in Fresno (excluding County islands) and is funded by the California Department of Housing and Community Development's CalHome program. The City also converts new single-family housing development loans to first-time homebuyer assistance loans upon transfer of the property to the homebuyer. The City will continue to pursue funds for the first-time homebuyer program to assist City households during the planning period. The City will also conduct targeted marketing to real estate professionals, lenders and eligible homebuyers as part of the program and will include high opportunity areas in the marketing plan.	The City assisted 9 first-time homebuyers in Calendar year 2016, but then the State HCD CalHome agreement expired in April 2017. In 2020, the City allocated $971,100 of funding through its first allocation of PLHA program for a down payment assistance program for low- and moderate-income first-time home buyers. In 2021, the City allocated $1.5 million of its second allocation of PLHA funds for the down payment assistance program. In 2022, the City allocated an additional $1.6 million of funding through its third allocation of PLHA for a down payment assistance program. The total allocated to the down payment assistance program to date is $4.1 million. Once the City receives its executed Standard Agreements for PLHA funds from the State of California, it will implement the down payment assistance program.	Modify the program with updated homebuyer assistance program funded with PLHA funds. Explore opportunities to expand program.

Program Summary		Progress Evaluation	Recommendation
9	**Homeless Assistance.** The City will apply for, or support applications for funding for emergency shelters, transitional or supportive housing. The City will continue to use Emergency Solutions Grant (ESG) Program funds to support needed social services and review applications annually. The City is also utilizing the HOME Investment Partnerships (HOME) Program and is contracted with the Fresno Housing Authority to implement a $1 million tenant-based rental assistance program for persons that are homeless, threatened with homelessness, or in need of housing assistance after completing a transitional living program. In addition to ESG and HOME funds, during fiscal year 2016, the City allocated approximately $520,000 in general funds for the MAP Point at the Poverello House, outreach, and assessment of homeless individuals. The City will continue to participate in and support the Fresno Madera Continuum of Care and the MAP Point at the Poverello House.	The City funded multiple activities with its federal allocations through HOME, CDBG, ESG, and HOPWA programs. The Tenant Based Rental Assistance (TBRA) program, funded with HOME dollars, is run in coordination with FMCoC, the Housing Authority, and other subrecipient vendors to provide emergency shelter, homeless prevention and rapid rehousing for clients in need. The Living Room, funded with HOPWA dollars, is a WestCare California program that provides short-term rental and mortgage assistance, tenant-based rental assistance, transitional housing, homelessness prevention, rapid re-housing, supportive services, and housing information to homeless individuals and those at-risk of homelessness affected by HIV/AIDS. The primary goals of the program were to help participants achieve both permanent housing and health stability. WestCare California also operated Project Unite with ESG funds to provide rapid rehousing and homelessness prevention services through weekly outreach activities. The program focused on engaging homeless and chronically homeless extremely low-income individuals and families, including Veterans who are not eligible for housing assistance through Supportive Services for Veteran Families and VASH. The City also used CDBG to fund the Marjaree Mason Center to support the operation of an emergency shelter, five rooms within a transitional housing safe house, and transitional services for victims of domestic violence. Poverello House was awarded ESG funds for its Homeless Outreach Progressive Engagement (HOPE) Team to provide street outreach to people experiencing homelessness that live in the City of Fresno. The purpose of the team is to link people experiencing homelessness to navigation services and shelter. The Rapid Rehousing Program through Poverello was also funded with ESG to provide direct case management and rental support for those experiencing homelessness in the City for up to one year. The program helped pay for security deposits, past-due PG&E bills, and direct rental support. Case managers also worked with participants to develop a plan to sustain housing beyond the rapid rehousing program support.	Maintain program.

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		Using state and/or federal emergency funding, the City funded the operations of multiple homeless shelters: Mental Health Systems Triage Center at the Hacienda; Turning Point of Central California's Golden State Triage Center, Bridge Point Triage Center, Step Up on 99, and Journey Home at Welcome Inn; Sage Commons; and Elevate Community Service's Villa, Ambassador, and Travel Inn Triage Centers. Funding that has been allocated to the City in addition to HUD CPD annual funding includes the Homeless Housing, Assistance, and Prevention (HHAP) Round 1 ($6.1 million); the HHAP Round 2 ($2.9 million); and an initial disbursement of the $7.5 million in HHAP Round 3 funding. The City was also awarded $5 million in Encampment Resolution Funding that will be used to address a large encampment in downtown Fresno, including the provision of emergency shelter at Poverello House's Village of Hope I. The City has also allocated $1 million of its ARPA funds to a voucher assistance and/or landlord incentive program to ensure there are resources available to support permanent housing options for individuals as they exit emergency shelters or temporary housing. As of 2022, the City has assisted 3,533 unsheltered people through federally-funded programs and 1,071 unduplicated people were assisted with overnight shelter.	
10A	**Mobile Home Parks.** In an effort to preserve the city's mobile home parks, the City will: Compile a list of resources and provide technical assistance to facilitate the maintenance and preservation of mobile home parks. Conduct yearly outreach to mobile home residents and park owners regarding potential funding sources, including the State's Mobilehome Park Rehabilitation and Ownership Program. Outreach may be facilitated by going to mobile home clubhouses and posting information in readily visible locations. Conduct and publish an assessment of housing-related needs in mobile home parks through communications with residents and	Between 2016 and 2019, the City held public meetings, workshops, and hearings annually for residents (including mobilehome parks residents) to voice their concerns and request needs for the neighborhoods, such as sidewalks, better lighting, better crime prevention strategies, and more neighborhood parks. The City also distributes information annually to inform owners and residents of the Mobile Home Rent Stabilization Ordinance. The City adopted the Mobile Home Park Act in 2021 and in July, by agreement with HCD, the City took over enforcement of mobile home parks within city limits. As a result of the adoption of the Mobile Home Park Act, the City's Code Enforcement Department created the Mobile Home Inspection Team, which oversees the health and safety ordinances and the Planning and Development Department created a new review and inspection process and team to oversee the permitting of mobile home placement and site improvements. In 2021 and 2022,	Maintain program.

	Program Summary	Progress Evaluation	Recommendation
	owners, identifying city, state, federal, and private resources available to address those needs. Provide assistance with funding applications to mobile home park owners, residents, and non-profit organizations to assist in mobile home park preservation. Compile a list and map of mobile home parks in Fresno. Develop a list of mobile-home preservation experts and nonprofit organizations that can assist in the preservation of mobile home units. Provide this information to interested mobile home park residents, owners, and non-profit organizations.	there were 66 mobile home placements on site submitted, 105 entitled and permitted, and 12 placed on site.	
10B	**Housing Choice Vouchers.** The Housing Choice Voucher (HCV) program, formerly the Section 8 program, provides rent subsidies to very low-income households which overpay for housing. Prospective renters secure housing from HUD-registered apartments that accept the certificates. HUD then pays the landlords the difference between what the tenant can afford (30 percent of their income) and the payment standard negotiated for the community. In Fresno, the Fresno Housing Authority administers the HCV program. To facilitate access to the Housing Authority's program, the City will collaborate with and support the Housing Authority's program on an annual and ongoing basis by: Providing information about Housing Choice Vouchers at the planning counter, on the City/ website and in other public places to increase awareness. Assisting the Housing Authority in maintaining a list of multifamily rental developments that accept vouchers and hold regular discussions with	In 2017 and 2018 the City of Fresno increased the visibility of Housing Choice Vouchers through its website and developed a methodology to define High Opportunity Areas (HOAs), sharing the boundaries and list of information on apartments within the HOAs with the Housing Authority. In 2019, the Housing Authority initiated a Landlord Outreach program to educate and encourage new landlords to participate in the HCV program, as well as ensure current landlords are educated and providing quality housing. In January and February of 2020, the Landlord Outreach Assistant Manager met separately with 27 landlords of properties located within HOAs to provide training and information and a few agreed to accept vouchers. During the COVID-19 closures in 2020, the department focused on providing a seamless virtual customer service experience for both landlords and tenants, which included serving as liaison and growing the Partnership between Fresno Housing and Landlords. Landlord outreach efforts continued during the pandemic, encouraging landlords to participate in Fresno Housing programs. These efforts led to seven new landlords and two property management companies accepting HCVs, two of which are in HOAs. In January, Fresno Housing submitted a Mobility Demonstration application to HUD in efforts to provide support to families who desire to lease up in HOAs. The Fresno Housing Authority launched a Landlord Incentive Pilot program in March 2021 and added additional incentives in June 2021 to	Maintain program. Expand marketing efforts and education about the Emergency Rental Assistance Program in addition to the HCV program.

	Program Summary	Progress Evaluation	Recommendation
	potential new landlords to expand the number of developments that accept HCV tenants. Collaborating with the Housing Authority to conduct outreach to developments in high opportunity areas about participation in the Housing Choice Voucher program by exploring best practices to target areas for voucher education, such as areas with high-performing schools or areas with high area median income, as well as areas near jobs and transit. The City's role will be to assist in the geographic analysis necessary to target the outreach. The outreach will be performed on an annual and ongoing basis.	encourage landlords to either stabilize or bring on new units to the program in efforts to encourage them to house families during the COVID-19 pandemic. The pilot was funded through the use of CARES funding to monetarily incentivize landlords to rent to voucher recipients searching for affordable units within FHA's jurisdiction. Approximately $140,000 was distributed to landlords during the incentive period from mid-June 2021 to mid-December 2021, however all incentives expired December 31, 2021, in accordance with the sunset of CARES funding availability. In 2023, Fresno Housing has partnered with the City of Fresno to launch the Voucher Incentive Program (VIP) to assist voucher holders find housing. Developing from the pilot, the lead VIP coordinator will promote the HCV program, work with current voucher holders to conduct tenant education on eligibility for additional types of assistance through the VIP program such as security deposit and rental fee assistance. The coordinator will also promote and provide information on the incentives offered through the VIP program to recruit eligible, non-participating property owners. As of January 2023, the number of HCV holders in the city is about 7,400 and the number in HOAs is 147, or 1.29 percent of all voucher holders in the city. In addition to HCV, the Fresno Housing Authority also administers special programs such as VASH and HOME, which are rental assistance programs that extend into HOAs as well. Combining these special programs with HCVs the total number of households receiving rental assistance in HOAs is 154 or 1.35 percent of all voucher holders in the city.	
11	**Fresno Green.** The City will continue implementation of the Fresno Green program and work with developers to lower long-term housing costs through energy-efficient housing developments. The City will also monitor grant funds for applicable housing related energy-efficient items and pursue funding on an ongoing basis.	The City continues to offer the Fresno Green program to developers as an incentive to build sustainably, which in turn reduces utility costs to homeowners or renters. In 2016, two housing projects received Fresno Green Certification and both were affordable housing sites. One was the 51 dwelling unit South Fulton Project at 829 Fulton Mall and the other was the 8 dwelling unit Glenn Avenue Apartments at 146 N. Glenn Avenue. In 2017, the City began an update of the Fresno Green program to better align it with the 2035 Fresno General Plan and state policies and goals associated with greenhouse gas (GHG) reduction; however, funding ran out after the first phase of the update and additional funding was not	Delete program.

Program Summary		Progress Evaluation	Recommendation
		pursued by grant partners, therefore the revitalization and implementation were stalled. No housing projects received the Fresno Green Certification between 2017 and 2023. The Fresno Green program has been mostly superseded by the CalGreen Building Code and California Energy Code and other State mandates such as the Model Water Efficient Landscape Ordinance. The City's updated sustainability measures for new buildings are outlined in the City's GHG Reduction Plan, adopted in 2021.	
12	**Downtown Development.** In 2016, the City adopted the Downtown Development Code (DDC) to encourage infill development at the City's core that is compact and walkable, offers a mix of uses, and creates a sense of place. The Downtown zoning standards contain a residential capacity limit for the Downtown Planning Area (9,990 dwelling units), with unlimited density on individual Downtown properties. Residential capacity in the area is significantly increased with the DDC and allows residential development where it was not previously permitted. The Downtown standards provide a streamlined and clear set of zoning regulations, making good projects easier to build in Downtown and the surrounding neighborhoods. To facilitate higher-density mixed-use development in Downtown, an environmental impact report assessed the proposed Downtown plans and code so that new development that complies with Code will not be subject to further environmental analysis. The City will ensure that the Downtown Development Code standards will not constrain the potential for developing housing and that zoning standards for the sites ensure continued adequate capacity to meet the City's RHNA obligation.	Downtown Development Standards were adopted by the Fresno City Council on October 20, 2016. There have been no rezones or plan amendments in Downtown Fresno and no changes have been made to the Downtown Development Standards since then.	Delete. Program was completed.

	Program Summary	Progress Evaluation	Recommendation
12A	**Downtown Displacement Prevention.** The City will implement Policy 7.12.1 of the Downtown Neighborhoods Community Plan which calls for the convening of a displacement task force to explore ways to provide opportunities for low income residents and merchants to remain in their neighborhoods if displacement is observed due to substantial and sustained increases in rent. The task force should work in conjunction with low income residents, community organizations serving low income residents, experts on displacement, low income business owners, and property owners in the plan area. The intent of the displacement task force is to establish measurements and collect data on those measurements that can identify gentrification and/or displacement of residents or businesses in Downtown. The data gathering measures are intended to establish baseline conditions which will be used to compare to future conditions as the Downtown area redevelops. The following action items are included in the Plan: Convening a displacement task force to explore ways to provide opportunities for low-income residents and merchants to remain in their neighborhoods if displacement is observed. The Task Force shall be convened in 2018, within 3 months of the release of the first annual report on displacement. Annually gathering data on lease rates, vacancy rates, rent burden, rental rates, restricted affordable housing covenant expirations, and, if applicable, direct displacement for use by the task force. An annual report on data gathered shall be released for public review and input.	An Anti-Displacement Task Force was established by City Council in 2018 and Task Force appointees began meeting regularly in 2019, after which the Task Force decided to meet on a quarterly basis. In 2019, the City hired the Thrivance Group to craft specific measurements applicable to key concerns identified by both homeowners and renters, including strategies to prevent displacement of both people and culture. Specifically, the Thrivance Group's scope of work consisted of social climate analysis and data collection, identification of groups especially vulnerable to displacement, and strategy development to prevent and avoid displacement. Extensive community engagement around displacement was conducted. In 2021, the Thrivance Group produced the "Here to Stay: A Policy-Based Blueprint for Displacement Avoidance in Fresno" report for the City, which included suggested anti-displacement priorities and strategies. The Anti-Displacement Task Force's recommendations on displacement prevention priorities were presented to the Planning Commission in January 2022. The recommendations also informed the One Fresno Housing Strategy, presented to the City Council in April 2022. The goal of the One Fresno Housing Strategy, a three-year framework for fast-tracking the implementation of the City's existing housing plans, is to "create an environment that leads to the 3-year completion, rehabilitation, and preservation of 6,926 affordable and 4,110 market-rate housing units by identifying available land, vacant property, and financial resources while deploying a wide range of development partners to increase housing options across the housing spectrum throughout the City." The One Fresno Housing Strategy contains 71 programs for accomplishing this goal, organized under the objectives of housing preservation, displacement prevention, and promotion of equity, with a special set of programs designed to house the unhoused. Programs that were adopted by the City Council in 2022 include: • Allocation of $1,950,000 to the Central Fresno Neighborhood Trust, to prevent displacement and acquire and rehabilitate 50 units of rental housing; • Allocation of $222,500 to Central California Land Trust, a mechanism that allows for permanent affordability;	Program Completed. Delete.

	Program Summary	Progress Evaluation	Recommendation
	Identifying a set of actions that give displaced persons or businesses the opportunity to remain in the area if they wish to do so within 6 months of the Task Force finding that displacement is occurring, which will be carried out within one year of identifying the actions. Seeking funding for mixed income and affordable housing within the plan area, including potential set-asides for affordable housing for tax increment generated within any future Enhanced Infrastructure Financing Districts formed or a future citywide affordable housing trust fund. Working with the owners of affordable housing properties to ensure that affordability is maintained over the long term. Creating and maintaining a webpage to post information provided by staff to the task force, task force minutes, reports issued by the task force, and other relevant materials.	• Allocation of an additional $2M to the City's Eviction Protection Program; • Allocation of an additional $3.5 Million to the City's recently created local housing trust fund; • Allocation of $5M for a No Place Like Home Downpayment Assistance Program. • Allocation of $5M for a No Place Like Home for the creation of two tiny home villages • $850,000 to Fresno City College to allow students to create 24 tiny homes for low-income households.	
13	**City of Fresno's Home Energy Tune-Up (HETU) Program.** The City of Fresno provides the Home Energy Tune-Up (HETU) Program to residents of Fresno and seven other counties from Bakersfield to Stockton California in the PG&E electric service territory. This program is funded by California utility customers and administered by PG&E under the auspices of the California Public Utilities Commission. The City managed the HETU program since 2011 and is committed to continuing to provide local residents with this vital service to help drive down energy costs, improve indoor air quality, and make homes more comfortable for Fresno residents.	Funding was discontinued for this program so the City has stopped offering this program. Instead, the City has focused on implementing the GHG Reduction Plan and pursued opportunities to ensure its municipal buildings are using energy resources efficiently. In 2021, the City finished energy efficiency and solar projects at Fresno City Hall and the Municipal Service Center (MSC) and launched several parks and Parks & Public Safety Energy Efficiency Projects in 2022. Projects include LED lighting upgrades, HVAC upgrades, system controls upgrades, transformer upgrades, installation of mobile backup generators at one Fire and at one police station, and energy efficiency improvements at parks in highest need neighborhoods.	Delete program.

Program Summary		Progress Evaluation	Recommendation
14	**Expedited Processing/Business Friendly Fresno.** The City's Business Friendly Fresno program presents prospective developers with an easy-to-follow and customer-focused approval process. The program has established accountability and clear protocols and authority for decision-making that align with the General Plan and the Development Code. The City will continue to implement the Business Friendly Fresno program as it applies to residential development projects and also continue to provide fast track or one-stop permit processing for housing developments affordable to lower-income households or other priority housing needs (i.e., extremely low-income, large families, persons with disabilities, farmworkers). As needed, the City will assess the incentives needed to facilitate the development of affordable housing.	The City has made several updates to the development review process to simplify and enhance the process for customers. The City also provides technical assistance and development incentives (e.g., Infill Incentive Fee Waivers) to make development cheaper and easier. In 2017, Business Friendly Fresno completed the implementation of new Accela software to improve processing of applications, accountability, and transparency. In 2018 the City reorganized the Development Review Committee (DRC) such that applicants now work with one administrator who answers questions, receives and assigns submittals, and sends response letters. This new process has increased productivity, cost effectiveness, and responsiveness; initial feedback from applicants has been positive. The Planning Division made additional updates to the DRC process in 2020 and 2021 to simplify and enhance the process. In 2021 and 2022, the Building & Safety Services Division made improvements to the permit and approval process for customers including hiring new staff members in key positions, creating a new review process and inspection team for mobile home parks, creating a streamlined housing team, creating an Accela Information Services Division Team, reducing timelines for back checks, developing a new electronic submittal record request (LP records), offering new standard plan templates for ADUs, and improving coordination between City departments to streamline site plan permit process. Notably, in 2019, the City instituted a Money Back Guarantee Program to enforce mandatory processing timelines for planning entitlements and building plan check reviews but repealed the program in 2020 so the program is no longer effective. Between 2019 and 2020, there were no overdue plan reviews that resulted in any money being returned.	Delete program. Combine with Program 15 below.
15	**Development Incentives.** The City will continue to provide priority processing for the construction of new housing in the Downtown Planning Area by processing completed plans, consistent rezoning, and Development Permit review and Conditional Use Permit applications for permitting within an average of 75 working days. The City will continue to provide reduced application fees	The City has been generally successful in executing priority processing for new projects in the Downtown Planning area, with approvals being issued on average in less than 75 days. Additionally, the City continues to provide impact fee waivers for qualifying projects and offers reduced application fees and priority processing for single-family and multi-family projects within the Inner City Fee Program area.	Maintain program.

	Program Summary	Progress Evaluation	Recommendation
	and priority processing for single-family and multi-family projects within the Inner City Fee Program area, as referenced in the Municipal Code, to create housing units. In addition, impact fee waivers are available for qualifying infill projects in priority areas of the City pursuant to Ordinances 2013-21 (The Build Act), and Fresno Municipal Code Article 4.14 (Fee Waivers for Certain Projects in Economically Disadvantaged Areas). As funding is available, the City will reduce or subsidize development and impact fees for affordable housing.		
16	**Large and Small Lot Development.** The Sites Inventory includes 2,644 acres of vacant and underutilized sites that are over 10 acres in size (53.8 percent of all residential capacity on vacant and underutilized sites). To encourage a strategic approach to the development of large sites and to facilitate the development of housing, the City will encourage the development of large sites through an allowance of phasing of development and off-site improvements and, where applicable, through the Specific Plan process. The City will assist interested developers/property owners in identifying opportunities for lot consolidation or lot splitting. The City will continue to streamline the processing of requests for lot consolidation and lot splitting concurrent with other development reviews. The City will also facilitate splitting of large lots to promote the efficient use of land for residential development in compliance with the Subdivision Map Act, when an applicant submits an application. Currently, the City utilizes tools such as ministerial processing and other streamlining tools, as appropriate, to facilitate lot merging and parcelization.	In 2016, the City reduced the Voluntary Parcel Merger application fee from $5,360 to $627 which resulted in the greatest number of Voluntary Parcel Mergers since the inception of the program in 2011. That year the City approved 15 voluntary parcel mergers. Between 2017 and 2022, the City approved between 14 and 22 parcel mergers per year. Some of these projects involved Housing Element Sites while others did not. A monitoring program for large and small lots was established in July 2016 with procedures prepared as part of Program 2 above. Between 2016 and 2022, construction occurred on 283 Housing Element sites that are under 1 acre and 83 sites that are over 10 acres. There were also 3 projects that included sites that were both over 10 and under 1 (these projects were both rezoned in 2017 through the Southwest Fresno Specific Plan (SWFSP) adoption and associated General Plan cleanup). The monitoring program also identifies affordability. Projects that occurred on Housing Element sites larger than 10 acres were not explicitly designated with an affordable housing component as they were typically developed as single family subdivisions.	Maintain program.

Program Summary		Progress Evaluation	Recommendation
	The City will also establish a program to monitor development trends on small and large lots, identify regulatory barriers, and adjust incentives and/or development standards accordingly. The monitoring program will include a threshold defining small and large lots and may vary by neighborhood, community plan area, or zoning district. The monitoring program will include a biennial review of development on large and small lots, and will seek input from developers and property owners on regulatory barriers to development of these lots. The monitoring program will further track the percentage of affordable units developed on large lots on an annual basis and after the first year of monitoring, will identify a minimum threshold of affordable units for the total number of large lots. Monitoring will begin upon receipt of the first application for development on a large lot included within the sites inventory. If the total number of affordable units being developed on large lots does not reach the identified minimum threshold beginning in the second year of monitoring, then the City may develop and apply incentives in order to encourage development of affordable units. If development on large lots will lead to the need for an amendment to the sites inventory, such analysis will consider any necessary rezoning consistent with Program 2.		
16a	**State Laws Related to Housing Development.** As part of an ongoing effort to ensure compliance with emerging state laws, the City will identify appropriate revisions to the City's Development Code and present them for consideration consistent with FMC procedures. As part of this effort, the City will work to increase awareness of standards that allow second dwelling units, backyard cottages, tiny houses and accessory living quarters by providing written information at the City's planning counter and on the City's website.	The Planning & Development Department regularly reviews and evaluates the latest State laws as they relate to the Development Code to determine what, if any, changes are needed to the Code. Beginning in 2019, the City began providing information on State ADU standards and has continued to build its local program to encourage residents to develop ADUs. The City intends to amend the Development Code by 2024.	Continue to make appropriate revisions to the City's Development Code to maintain compliance with state laws.

	Program Summary	Progress Evaluation	Recommendation
17	**Agricultural Employees (Farmworker) Housing.** The California Employee Housing Act requires that housing for six or fewer employees be treated as a regular residential use. The Employee Housing Act further defines housing for agricultural workers consisting of 36 beds or 12 units as an agricultural use and permitted where agricultural uses are permitted. The City of Fresno Development Code allows agricultural labor housing by right in the Buffer (B) district and specifically indicates that in the case of any conflict the California Health and Safety Code relating to agricultural employee housing, State law supersedes the Development Code. The City will review the Fresno Development Code to ensure continued compliance with the California Employee Housing Act. Based on the review of the Development Code, the City will amend or revise the Fresno Development Code, if needed, to comply with the Employee Housing Act.	The Agricultural Employee Housing (AEH) Act was reviewed and no changes to the Development Code are necessary, because it currently meets the requirements of the AEH as Development Code Section 15-2716 states "Regarding Agricultural Labor Housing, in the event of a conflict between this Code and California Health and Safety Code section 17021.6, relating to agricultural land use designations for employee housing, the Health and Safety Code shall prevail." However, in order to increase clarity between the Code and State law, Planning staff will prepare a Text Amendment to update the Code's Use Tables to add "agricultural labor housing" as a permitted use in each zone that currently permits agricultural uses. Staff intends to pursue this update by 2024.	Modify timeframe to reflect 2024 development code amendment if not already completed.
18	**Infrastructure Priority Program.** The Department of Public Utilities has established written policies and procedures that ensure water and sewer services are to be provided as a priority for developments that include units affordable to lower-income households, contingent on the development application's compliance with all entitlement requirements. The City will ensure that all development applications are considered, reviewed, and approved without prejudice to the proposed residents, contingent on the development application's compliance with all entitlement requirements.	There are administrative orders in place to ensure that all development applications are considered, reviewed, and approved without prejudice.	Maintain as a policy, but no additional implementing action is required.

	Program Summary	Progress Evaluation	Recommendation
19	**Water and Sewer Service Providers.** The City of Fresno Department of Public Utilities (DPU) provides potable water to the majority of the City, and the City is the Regional Sewer Agency for the Fresno-Clovis Metropolitan Area. In accordance with Government Code Section 65589.7, immediately following City Council adoption, the City must deliver to all public agencies or private entities that provide water or sewer services to properties within the City of Fresno a copy of the 2015-2023 Housing Element.	A copy of the Fresno General Plan 2015-2023 Housing Element was sent to the City of Fresno Department of Public Utilities Water Division and Wastewater Division, as well as to the Pinedale County Water District and the Bakman Water Company which supply water to a segment of households within the city limits.	Delete program. This is a required practice and progress does not need to be annually monitored.
20	**Comprehensive Code Enforcement.** The City of Fresno, in conjunction with private businesses and developers and community-based non-profit organizations, will continue to collectively increase neighborhood revitalization activities. The Community Revitalization Division will continue to assertively conduct targeted neighborhood inspections of housing units for potential health and safety issues. The Community Revitalization Division's Safe Housing and Vacant Structure Team, and all Area Teams as needed, will continue to improve neighborhoods throughout Fresno and increase livability by creating safe and healthy conditions, removing blight, educating citizens, promoting pride of ownership and building collaborative relationships with the community. In 2016, the City established a Neighborhood Revitalization Team (NRT) that is assigned to targeted neighborhood revitalization activities. The City adopted and implemented a revised blighted vacant building ordinance and has established the Strike Team on Problem Properties. The Mayor-Council Code Enforcement Task Force is currently discussing options to improve property conditions and	The Community Compliance Unit is responsible for traditional code enforcement complaints and enforcement. This Unit gained one employee to have 29 inspectors assigned to 7 City Council Districts and is primarily focused on life safety and blight violations. In 2022, this Unit addressed 12,452 unique code cases. This Unit is also responsible for monitoring vacant residential and commercial buildings and monitoring and addressing homeless encampments on private property including vacant lots and structures. The Special Teams Unit is comprised of 6 specialty teams, each responsible for addressing specific code enforcement matters. The School Area Team (SAT) provides pro-active code enforcement and community outreach near schools to improve neighborhoods, reduce blight, enhance safety, equip residents to become civically engaged, and connect low-income residents to housing resources to improve their quality of life. Awarded 2021 Innovative Program of the Year Award by the California Association of Code Enforcement Officers (CACEO), SAT conducted enforcement and outreach in 28 school areas in 2022. The Demolition Team facilitates abatements of severely damaged structures by demolition, responds to structure fires in need of summary abatement demolition, and monitors demolition and/or rehabilitation by property owner. There were 29 demolition cases finalized in calendar year 2022. The Rental Housing Unit is comprised of 5 separate teams. The Proactive Inspection Team, through the Proactive Rental Housing Improvement Program, requires all rental properties to be registered	Maintain program.

	Program Summary	Progress Evaluation	Recommendation
	preserve the city's existing rental housing stock. The City will pursue resolution of cases identified through the inspection process, including through enforcement actions against landlords if necessary.	with the Rental Housing Registry. Currently, there are 86,862 individually registered rental units located across 30,732 registered rental properties. The City requires registration of all rental properties and they are subject to Baseline Health & Safety Inspections pursuant to a random sampling formula to ensure habitability. The purpose of the Proactive Rental Housing Improvement Program is to address the issue of substandard rental properties, promote greater compliance with health and safety standards and to preserve the quality of Fresno's neighborhoods and available housing opportunities. Through the Proactive Rental Housing Improvement Program, 16,763 inspections have been conducted at both multi-family and single-family homes. The Reactive Inspection Team responds to all complaints of code violations received with regards to multi-family properties. They enforce substandard housing, public nuisance, and zoning violations. In 2022, reactive inspectors responded to 1,711 cases, successfully resolved 1,519 of them, and currently carry a case load of 234 active cases. The Anti-Slum Enforcement Inspection Team (ASET), in conjunction with the Police Department, Fire Department and County Housing Authority conducts proactive inspections of multi-family properties deemed to be slum properties based on Police, Fire, and Code Enforcement calls for service. They inspect the interior of all units, the exterior of all buildings and the property grounds for substandard building, public nuisance, and zoning code violations. The ASET Team currently has 13 cases open representing 161 units. The Mobile Home Inspection Team enforces the California Health & Safety Code, Mobilehome Parks Act and the California Code of Regulations Mobilehome Parks Act by investigating all Mobilehome and Mobilehome Park complaints at the 29 parks within the city of Fresno. In addition, the team conducts proactive maintenance inspections of mobilehome parks throughout the year. In 2022, the team conducted 9 park inspections representing 812 spaces.	
21	**Neighborhood Infrastructure.** The Public Works Department will commit its best efforts to provide households, within budgetary allocations, with neighborhood infrastructure improvements such as curbs, gutters, sidewalks, streets, curb ramps, driveway approaches, curb cuts, and street lights. In addition, the City will provide services	The City of Fresno Department of Public Works Construction Management Division completed various infrastructure projects during the previous Housing Element cycle. At an overall cost greater than $200 million, projects included: street construction, parks, traffic signal, sewer and water, and transportation projects. HUD CDBG funds were used to fund projects in low- and moderate-income neighborhoods.	Maintain actions, combine with Program 27.

	Program Summary	Progress Evaluation	Recommendation
	to facilitate development of undeveloped or underdeveloped properties. The City, through the Disability Advisory Commission and the ADA Transition Plan for the Public Right of Way, will continue to receive citizen suggestions on needed ADA improvements and implement the most needed projects on a priority basis.	The City has developed a supplementary map, "Fresno General Plan Housing Element Annual Progress Report for 2018 - City of Fresno Infrastructure Projects Completed (Capital Improvements and CDBG Funded) In Relation to Housing Sites," that addresses relationship between infrastructure projects and Housing Element sites.	
22	**Housing Rehabilitation.** The City offers programs that provide paint and minor repair to seniors, distressed property grant, and home rehabilitation funds for lower-income households. These activities have been funded primarily with HOME and CDBG program funds. The Homeowner Rehabilitation Program provides a grant to low-income, owner-occupied households to make needed repairs and improvements to their homes. The maximum allowable amount for a rehabilitation grant is $65,000. The City also offers a Senior Paint Program in the form of a grant to low-income senior citizens (62 years of age or older) who own and occupy their home. Grant funds provide for a licensed lead-certified painting contractor to paint the exterior of the home. The Distressed Property Grant provides up to $15,000 per property to assist low-income homeowners with correction of code violations.	The Housing and Community Development Division (HCDD) works to complete housing rehabilitation projects for homeowners with low or moderate incomes. Between 2016 and 2022 projects were completed under the following programs: - City of Fresno Senior Paint Program - Fresno EOC Roof Program - Minor Code Compliance Program - Targeted Distressed Area Program - Self Help Home Repair Program and - Habitat for Humanity Home Repair Program The rehabilitation programs experienced delays due to the COVID 19 pandemic. The City continued to support owner-occupied home repair programs by allocating $700,000 in Program Year 2022 CDBG funds to home repair programs for low- and moderate-income seniors. The funds were used to maintain the City's in-house owner-occupied home repair programs. The City has also allocated $553,717 of its third allocation of PLHA to further its program focused on owner-occupied home rehabilitation for low-income people not eligible for funding through other programs, such as mobile home residents. Once the City receives its executed Standard Agreements for PLHA funds from the State, it will implement the program.	Maintain program.
23	**Franchise Tax Board Building Code Program.** The Franchise Tax Board (FTB) operates the Substandard Housing Program, which assists State and local agencies responsible for abating unsafe living conditions that violate health and safety codes. Property owners in violation of health and safety code standards are not allowed to make certain deductions on their personal tax	The City investigated participation in the Franchise Tax Board's (FTB) Substandard Housing Program, researched necessary notices and procedural requirements, and began participating in the Program as it relates to ASET properties. The City has only issued two notices since participation in the program, this was in 2017. Typically, the City does not need to issue notices because remedies have been found within the required six-month window of non-compliance.	Delete program.

	Program Summary	Progress Evaluation	Recommendation
	returns pursuant to California Revenue & Taxation Code (CR&TC) Sections 17274 and 24436.5. The additional revenue collected by FTB is transferred to the Local Code Enforcement Rehabilitation fund. These funds are allocated and disbursed to the cities and counties which generated the notification of substandard housing to the FTB. The City will investigate participation in this program as a tool to reduce the number of substandard units in Fresno.		
24	**At-Risk Housing.** The City will continue or undertake the following activities during the Housing Element planning period to guard against the loss of housing units available to lower-income households. The efforts listed below represent a varied strategy to mitigate potential loss of at-risk units due to conversion to market-rate units. These local efforts utilize existing City and local resources. They include efforts to secure additional resources from the public and private sector should they become available. Provide ongoing preservation technical assistance and education to affected tenants and the community at-large on the need to preserve the existing affordable housing stock. Monitor owners of at-risk projects on an ongoing basis, at least annually, in coordination with other public and private entities to determine their interest in selling, prepaying, terminating or continuing participation in a subsidy program. Monitor at-risk projects through the use of existing databases (e.g., HUD, State HCD and California Tax Credit Allocation Committee).	In 2016, the City of Fresno approved an assumption and assignment agreement for DHI to assume a $2.9 million note from the Annadale Housing Partners for the substantial rehabilitation of the King's View Estates, a 116-unit affordable housing complex in southwest Fresno. In 2017, the Housing and Community Development Division received a request from Opportunity Builders to consider an assignment and assumption of its HOME Program Agreement and related documents to EAH. EAH has proposed to acquire the Village at Kings Canyon Apartments, a 48-unit affordable rental property in southeast Fresno. In 2020, the City became aware of five properties designated as at-risk of converting to market rate by the California Housing Partnership's Preservation Clearinghouse. The City did not receive any notices of intent to convert to market rate for any properties during the 2018-2022 calendar years.	Maintain program. Modify to include required timeframe for noticing.

	Program Summary	Progress Evaluation	Recommendation
	The City will respond to any federal and/or State notices, including Notice of Intent to Pre-Pay, owner Plans of Action, or Opt-Out Notices filed on local projects, by contacting property owners upon receipt of notices. Work with the Fresno Housing Authority to determine the availability of tenant-based vouchers for tenants who choose to move from at-risk units or are displaced by conversion. Establish contact with public and non-profit agencies interested in purchasing and/or managing units at-risk to inform them of the status of such projects. Where feasible, provide technical assistance and support to these organizations with respect to financing. The City will actively pursue affordable housing opportunities and maintain a list of interested and qualified affordable housing developers.		
25	**Enhanced Police Service to High Crime Neighborhoods.** The Police Department shall continue to focus on strategies to reduce Part I crimes, which are measured by the Federal Bureau of Investigation to assist cities in comparing themselves against other cities in the following categories: murder, rape, robbery, aggravated assault, arson, burglary, theft and auto theft. The Department shall also continue to utilize the Violent Crime Impact Team (VCIT), Multi-Agency Gang Enforcement Consortium (MAGEC), Street Violence Section (SVS), and Patrol Division in reaching this goal. In addition, the Department shall continue its prevention and intervention programs such as the Police Activities League, Citizens on Patrol (COP), and Mayor's Gang Prevention Initiative in an effort to reduce crime in high-crime neighborhoods.	The Police Department continued to use Problem Oriented Policing Officers, Multi-Agency Gang Enforcement Consortium Detectives (MAGEC), Street Violence Bureau Detectives (SVB), the Patrol Division, District Safety Teams, Police Activities League, Building Better Neighborhoods (formerly known as Bringing Broken Neighborhoods Back to Life), SRO (Student Resource Officers), the Fresno Housing Officer (formerly known as ENPH) the Police-Community Relations Unit, K9 Officers, Skywatch, the Traffic Unit, Bicycle Patrol, and tools such as ShotSpotter (gunshot detection) in an effort to reduce crime in high crime neighborhoods. The City was awarded the FY22 COPS Hiring grant in October 2022 to hire twelve (12) officers, assigned to go Bike Patrol, in four policing districts – Central, Southeast, Northeast, and Northwest. The Officers will work with the residents in the high violent crime areas and homelessness as needed. Also, the City has continued partnership with the Housing Authority of Fresno along with other Housing organizations to fund two dedicated police officers for HUD contracts. These officers, one located in Southwest Fresno and the other in Southeast Fresno service local housing developments to eradicate crime. The City continues to be a part of	Delete program. Not relevant to the Housing Element.

	Program Summary	Progress Evaluation	Recommendation
	In 2015, the City of Fresno was awarded $1,875,000 in grant funding through the Department of Justice's Office of Community Oriented Policing Services (COPS Office) COPS Hiring Program (CHP). The money will be used to hire neighborhood police officers and school resource officers for the City of Fresno.	and operate within the Multi-Agency Gang Enforcement Consortium (MAGEC), Street Violence Bureau, Patrol Division, Citizens On Patrol, and the newly established Police Community Relations Unit. Additional community education programs hosted by the Fresno Police Department are the Residents Academies – English, Spanish, Hmong and recently added Sheikh, Police Explorer Program, Teen Police Academy, Police Activities League (PAL), and Fight Girl Fitness (through PAL). The MAGEC Unit has a working relationship with the Fresno Economic Opportunities Commission (FEOC) Advance Peace (a non-profit organization) and Project Safe Neighborhood Task Force which focuses on violence intervention and prevention. The City continues to utilize the expertise of Crime Data Specialists for crime mapping and data analysis as well as technology tools such as ShotSpotter, a gunshot detection system in an effort to reduce crime in high-crime neighborhoods. Grants awarded in FY 2021 and utilized in FY 2022 include: Sexual Assault Kit Initiative (SAKI) grant, Law Enforcement Specialized Units Program – Domestic Violence (a partnership with Marjaree Mason Center), the Law Enforcement Mental Health and Wellness Act 2021 (LEMHWA), De-Escalation and Project Safe Neighborhood (PSN) 2021 and 2022 grants.	
26	**Fair Housing Services.** The City will continue to contract with a fair housing service provider (Fair Housing Council of Central California [FHCCC]) to support enforcement of State and federal Fair Housing Laws and provide fair housing services that include, but are not limited to, the following fair housing service: Referring inquiries and landlord/tenant complaints concerning housing discrimination to the applicable regulatory body (State Department of Fair Employment and Housing, HUD, or private counsel) for processing Disseminating fair housing information citywide by sponsoring workshops, housing information fairs, monitoring of affirmative marketing and working closely with the State Department of Fair Employment and Housing	From 2016 to 2020, the City made annual contributions (~$40,000) to the Fair Housing Council of Central California (FHCCC) for education, complaint, and referral services. During this time, FHCC addressed an average of 800 fair housing complaints per year. A small percentage of complaints were referred to HUD for administrative or injunctive relief. In 2019, FHCCC conducted a Systemic Testing project in Fresno to determine the commonality of discrimination in new home developments on the basis of race and familial status. All testing was done according to the available rental market. Results showed that people of color suffered some form of housing discrimination in new developments across the city 48 percent of the time (i.e., refusal to rent, lying about availability, or imposing different rules, terms, or conditions of tenancy). The City completed an updated Analysis of Impediments to Fair Housing Choice (AI) in 2020. The AI includes an assessment of socioeconomic conditions, segregation and integration, access to opportunity, housing profile including publicly supported housing, housing for persons with disabilities, and fair housing activities. The AI	Maintain program.

	Program Summary	Progress Evaluation	Recommendation
	Advertising fair housing laws and complaint procedures through literature displays at City and County offices, non-profit organizations such as Central California Legal Services, Lao Family Organization, Fresno Interdenominational Refugee Ministries, Central Valley Regional Center, property management organizations, lenders, and other such organizations. Literature will be provided in English, Spanish, Hmong, Cambodian, Vietnamese and Lao. Disseminating fair housing information through radio, television and other media	also identifies barriers to fair housing choice within the City, and provides recommended activities to address those barriers. The activities fall into three main categories: fair housing complaint and referral services, public fair housing education and outreach, and fair housing education and outreach to housing industry professionals. In 2021 the City awarded $35,000 of CDBG funds for fair housing outreach and education for tenants and landlords through Central California Legal Services and $15,000 to the Community Housing Council of Fresno to conduct a series of fair housing workshops for prospective homebuyers and real estate/finance professionals. In 2021, the City increased its Fair Housing allocation by 70 percent over the prior year. It entered into Agreements with the Fresno Interdenominational Refugee Ministries (FIRM) and Resources for Independence Central Valley, Inc. (RICV) to address the impediments to Fair Housing the City identified. Through FIRM, the City provided public Fair Housing education and outreach through workshops, ethnic media, and informational resource distribution both city-wide and by targeted canvassing. Outreach materials were distributed in five languages throughout areas where low-income Southeast Asian, Spanish-, and Arabic-speaking communities congregate. Resources for Independence Central Valley also worked on an outreach and education program for vulnerable populations in the City with specific emphasis on easy-to-understand information on housing rights, housing discrimination, housing resources and subsidies, and overall fair housing issues. The City also allocated $580,000 of CDBG COVID-19 funds in 2020 and2021 to Community Housing Council to provide counseling to assist tenants and landlords impacted by COVID-19. Additionally, the City allocated $971,167 in 1st-year and $1,509,494 in 2nd-year Permanent Local Housing Allocation (PLHA) funds for a down payment assistance program for low- and moderate-income individuals. Once the City receives its executed Standard Agreements for PLHA funds from the State of California, it will implement the program.	
27	**Equitable Communities.** The City has initiated efforts to improve property values, living conditions, public safety, and the overall quality of life in older neighborhoods through the Fresno General Plan. The	The City receives HUD funding for capital improvement projects in CDBG areas of Fresno. The City initiated funding for pavement reconstruction, sidewalk improvements, and curb and gutter improvements in low- and moderate-income neighborhoods in two	Maintain and update to narrow the scope of actions for the program.

Program Summary		Progress Evaluation	Recommendation
	General Plan identifies Priority Areas for Development Incentives in Chapter 12 (Implementation), Figure IM-1. This figure identifies areas that have been designated as a priority for investment through policies established within the Plan. It includes the Downtown Neighborhoods Community Plan Area, Phase 1 and Phase 2 Bus Rapid Transit (BRT) and High-Frequency Transit Corridors, Infill Opportunity Zones (IOZs)— which have been defined as established neighborhoods generally south of Herndon Avenue—and the South Industrial Area. While specific investments were not identified in the General Plan, the City has focused internally on ensuring that future discretionary and formula dollars, especially related to housing, community development, streets, transit, and parks, align with these priority areas. To supplement this effort and focus on the equitable distribution of housing resource and public investment, the City will: Publish a General Plan Annual Report every December which will detail the location of public investments as they relate to Figure IM-1 and Figure IM-2 in the Plan, in addition to the location of building permit activity by sector as a metric of private investment. This report would be for use by the public and by the Implementation Committee described below as a basis for making recommendations on General Plan implementation. Establish a General Plan Implementation Committee with cross-sector involvement from the private sector, including developers and community organizations, as well as other relevant public institutions, to review progress on the priorities established in the General Plan to invest in older and disadvantaged neighborhoods and continue to refine and review City policy and practice to ensure investments and policies are furthering the goals of the Plan. This committee	locations in 2022 – the Burroughs Elementary Neighborhood Street Reconstruction Project (Phase I) and the West Fresno Elementary and MLK Neighborhood Street Improvements Project. The City also funded additional projects for overall neighborhood street improvements – the Yosemite Middle School Complete Streets Project, the Ericson Elementary Neighborhood Project, the Highway City Neighborhood Reconstruction Project, the Maple-Gettysburg-Holland Street Reconstruction Project, the Olive-Maple-Whitney-Chestnut Street Reconstruction Project, the Shields-Cedar-Dakota-Maple Street Reconstruction Project, and the Burroughs Elementary Neighborhood Street Reconstruction Project (Phase II). Across these eight projects, it is estimated that the City will serve 66,685 people in low- and moderate-income areas. The City also used $4.9 million in CDBG funds and to acquire property on Blackstone Avenue for the future development of a city-wide senior center. The senior center is anticipated to be about 29,000 square feet and will provide various services and indoor and outdoor amenities. The 2020-2024 Consolidated Plan also identifies Affordable Housing Development in high opportunity areas as a priority. In 2022, the City allocated $3.1 million in HOME funds for Affordable Housing Development or Rehabilitation and an additional $3.6 million in CDBG funds for land acquisition in support of affordable housing development. Additionally, the City allocated 28.5% of its third allocation of Permanent Local Housing Allocation for development of Affordable Multifamily Rental Housing and 28.5% for development of Affordable Single-Family Housing, focusing on areas of opportunity. Out of the total PLHA allocations, the City will have $4.1 million for the development of Affordable Multifamily Rental Housing and another $4.1 million for the development of Single-Family Housing. The City is awaiting receipt of executed Standard Agreements from the State of California for these funds.	

Program Summary		Progress Evaluation	Recommendation
	will convene in early 2017 and have opportunities to provide annual recommendations to the City on prioritization of future investments. Continue implementing the written policies and procedures that the City of Fresno Department of Public Utilities has established that ensure water and sewer services are to be provided as a priority for developments that include units affordable to lower-income households. Track infrastructure projects in the City to assess the distribution of projects in the different areas of the City. Seek out funding to address infrastructure and public service deficiencies in high-need areas. As funding sources allow, prioritize basic infrastructure improvements including water, sewer, and street lights in high-need communities. As recommended by the Mayor/City Council Task Force, consider a residential rental inspection program to proactively ensure rental housing units in the City of Fresno meet minimum health and safety standards and are safe to occupy. Assess the interaction between transportation network pathways and affordable housing sites to identify any barriers to affordable housing and employment access by July 2018. An action plan with specific timelines to address identified barriers will be developed within one year of completing the assessment. Continue to actively seek resources for disadvantaged communities throughout the City, including sources such as Affordable Housing and Sustainable Communities, Urban Greening, Housing Related Parks, Active Transportation Program, Transit and Intercity Rail Capital Program, Fresno COG Active Transportation and TOD Funds, EPA Brownfields Planning and Cleanup Programs, Highway Safety Improvement Program, and other funds. The City		

Program Summary		Progress Evaluation	Recommendation
	will actively seek resources annually and on an ongoing basis. Wherever possible, the City will partner with local community-based organizations and local affordable housing developers to build additional local capacity to seek funding and implement programs. As part of the partnership with community-based organizations, the City will explore zoning opportunities with respect to a variety of housing types, such as multi-family housing, in several areas within the City, including high opportunity areas. Beginning in 2019 and every two years thereafter, the City will present rezoning options for vacant land in high opportunity areas for Council consideration in order to provide opportunities for higher density development in all areas of the City. Rezoning option presentations shall include at least five sites, between one and ten acres in size. The City will identify and pursue opportunities to promote the development of affordable and mixed-income housing on rezoned sites through outreach to affordable housing developers and supporting the attainment of financing, such as CDBG, HOME Funds, tax credits, and state AHSC funds. These rezoning option presentations are not part of a program described by Government Code Section 65583(c)(1)(A). Finally, specific planning efforts should emphasize incentivizing multi-family housing in high opportunity areas. Expand affordable housing opportunities that prevent the concentration of single-family and multifamily dwelling units affordable to low- and moderate-income households. This includes, but is not limited to Development and Resource Management Department facilitation and streamlining of owner-initiated zoning and General Plan land use amendments that expand affordable housing opportunities outside of low- and moderate-income areas for Council consideration, consistent with FMC		

Program Summary		Progress Evaluation	Recommendation
	procedures. It also includes the City's monitoring program (Program 2) to ensure maintenance of adequate housing sites with capacity to accommodate lower income housing, and the inclusion of affordable housing options in the zoning code, such as tiny houses, which are currently allowed as accessory buildings. Work with the Fresno Housing Authority to assist households in using vouchers to rent in higher-opportunity areas and to identify landlords who are willing to accept vouchers in communities where vouchers are infrequently used. Develop a recommendation of best practices to target areas for voucher education, such as areas with high-performing schools or areas with high Area Median Income, as well as areas near jobs and transit.		
28	**Relocation Services.** In certain situations, tenants who have been served with a notice to vacate may be entitled to relocation assistance. Where individuals or families are displaced due to redevelopment or rehabilitation activities funded by the City, the City shall provide relocation assistance as prescribed by law.	Temporary relocation assistance was provided to tenants of the Glenn Avenue Apartments in 2016 during rehabilitation efforts. There was no relocation assistance required during 2017-2019. The Fresno Housing Authority had two sites with relocation during 2020. Mariposa Commons completed construction in mid-2020, and 28 families received relocation assistance to pay for moving expenses to return. Housing Authority also submitted a permanent relocation plan to the City for its proposed Blackstone/Simpson mixed-use project which displaced a small auto sales business and the City approved the plan on February 16, 2021. There was no relocation assistance required during 2021-2022.	Maintain program.

Source: City of Fresno, 2015-2023 Annual Housing Element Progress Report

SECTION 1E-6: PUBLIC OUTREACH AND ENGAGEMENT

State law requires cities and counties to make a diligent effort to achieve participation from all segments of the community in preparing a Housing Element. Section 65583[c][6] of the California Government Code specifically requires that "[t]he local government shall make a diligent effort to achieve public participation of all economic segments of the community in the development of the Housing Element, and the program shall describe this effort." This means that local jurisdictions must take active steps to inform, involve, and solicit input from the public, particularly low-income and racial and ethnic households that might otherwise not participate in the process.

To meet the requirements of State law, the City of Fresno completed outreach at both the local level and as part of the regional Fresno County Multi-Jurisdictional Housing Element effort to encourage community involvement. These efforts included:

- Information about the Housing Element posted on the Regional Project Website (https://fresnomjhe.com/housing-elements/)
- Stakeholder Consultations and Focus Groups
- Study Sessions with Planning Commissions, City Councils, and the County Board of Supervisors
- Community Workshops
- Community Survey

Regional efforts which included a community workshop, consultations, and a community survey, were facilitated with the California Coalition of Rural Housing (CCRH). These efforts are all discussed in Chapter 1 (Public Outreach and Engagement) of the Multi-Jurisdictional Housing Element. In addition to the outreach coordinated through the Multi-Jurisdictional Housing Element update, the City of Fresno partnered with the Housing Division to conduct community meetings and contracted with a local nonprofit, Every Neighborhood Partnership (ENP), to help conduct meetings throughout the city in order to receive broader input from more residents and stakeholders.

Community Workshops and Meetings

The City, from August 2022 to August 2023, conducted a number of community workshops and meetings on the Housing Element update. **Table 1E-6.1** summarizes the workshops and meetings held to date, followed by more details on each event.

Table 1E-6.1: Community Workshops and Meetings on the Fresno Housing Element to Date

Event #	Date	Type of Event	Location	Number of Participants
1	August 31, 2022 6:00 p.m.	Community Workshop	Manchester Gate Elementary School, 2307 E Dakota Avenue, Fresno, CA, 93726	22
2	October 27, 2022 11:00 a.m.	Community and Stakeholder Meeting	Romain Neighborhood Center, 745 N First St, Fresno	5
3	October 28, 2022 11:00 a.m.	Community and Stakeholder Meeting	Virtual	11
4	November 1, 2022 6:00 p.m.	Community and Stakeholder Meeting	Mosqueda Neighborhood Center, 4670 Butler Ave, Fresno	3
5	November 2, 2022 6:00 p.m.	Community and Stakeholder Meeting	Virtual	5
6	November 7, 2022 6:00 p.m.	Community and Stakeholder Meeting	Virtual	7
7	November 9, 2022 6:00 p.m.	Community and Stakeholder Meeting	Teague Elementary School, 4725 N Polk Ave, Fresno	16
8	November 15, 2022 10:00 a.m.	Community and Stakeholder Meeting	Virtual	18
9	November 16,2022 2:00 p.m.	Community and Stakeholder Meeting	Ted C Wills Neighborhood Center, 770 N San Pablo Ave, Fresno	30
10	November 28,2022 11:00 a.m.	Community and Stakeholder Meeting	Legacy Commons Apt Community Room	6
11	February 25, 2023 10:00 am	Community Workshop with El Dorado Park Community Development Corporation	El Dorado Park Community Center, 1338 San Ramon, Unit B, Fresno, CA 93710	17
12	March 1, 2023 5:15 p.m.	Community Workshop with Lowell Community Development Corporation	Helm Home, 1719 L. Street, Fresno, CA 73721	18
13	March 1, 2023 5:30 p.m.	Community Workshop with Highway City Community Development Corporation	Community Resource Center, 4718 N. Polk Ave, Fresno, CA 93722	45
14	March 11, 2023 12:30 p.m.	Community Workshop with Hidalgo Community Development Corporation	Hidalgo Elementary School, 3550 E. Thomas Ave, Fresno, CA 93722	27
15	March 14, 2023 5:30 p.m.	Southwest Fresno Community Development Corporation	Westside Church of God, 1422 W California Ave, Fresno, CA 93706	24
16	July 20, 2023 5:30 p.m.	Community Workshop with Southwest Fresno Development Corporation	Westside Church of God, 1422 W California Ave, Fresno, CA 93706	26
17	July 22, 2023 2:00 p.m.	Community Workshop with El Dorado Park Community Development Corporation	Paul Caprioglio Community Center, 5191 N. 6th Street, Fresno, CA 93710	23
18	July 28, 2023 4:30 p.m.	Community Workshop with Hidalgo Community Development Corporation	Hidalgo Neighborhood Resource Center, 646 N. Bond Street, Fresno, CA 93702	27
19	August 3, 2023 5:30 p.m.	Community Workshop with Highway City Community Development Corporation	Teague Community Resource Center, 4718 N. Polk Ave., Fresno, CA 93722	25
20	August 8, 2023 5:00 p.m.	Community Workshop	Nelson Elementary School, 1336 W. Spruce Ave., Fresno, CA 93650	19
21	August 9, 2023 4:30 p.m.	Community Workshop with Lowell Community Development Corporation	Ted C. Wills Community Center, 770 N. San Pablo Ave., Fresno, CA 93728	46
TOTAL				**420**

Source: City of Fresno, California Coalition of Rural Housing, and Every Neighborhood Partnership, October 2023.

Event #1: Community Workshop (August 31, 2022)

The first community workshop for the Housing Element update was held on August 31, 2022 in-person at Manchester Gate Elementary School to provide information on the Housing Element and solicit input from the community. The City notified the community of this meeting with flyers distributed in English, Spanish, Hmong and Punjabi through the Fresno Council of Governments (FCOG) listserv of regional stakeholders and community-based organizations (CBOs), and through the Fresno Housing Authority. Linguistica interpreters were available for Spanish, Hmong, and Punjabi monolingual speakers. Materials in Spanish, Hmong and Punjabi were available in-person at the workshop and online at the project website, accessible via QR code.

An Eventbrite registration page and Facebook event was created advertising that Spanish, Hmong, and Punjabi language interpretation would be provided, along with refreshments, and activities for kids. Flyers were sent out through the Fresno Housing Authority to affordable housing residents. City staff distributed the event to the email lists that they maintain for General Plan updates and the Anti-Displacement Task Force. Fresno City Community Affairs Representatives distributed the event to Hmong and Punjabi speaking communities.

Figure 1E-6.1: Community Workshop For The Housing Element Update, August 31, 2022



In the presentation, members of the public were introduced to the process of developing the Housing Element both for the region and for the City of Fresno. They were also given information about current housing conditions in the region and in Fresno and were invited to participate in a discussion about local housing needs. The discussion was prompted by the following questions:

- What are Fresno's greatest assets?
- What do you think are the most critical housing issues in Fresno?
- What groups within the community have the greatest housing needs?
- What are Fresno's most significant fair housing issues?
- Do you have suggestions for addressing housing issues in Fresno?
- Any suggestions for getting more community involvement?

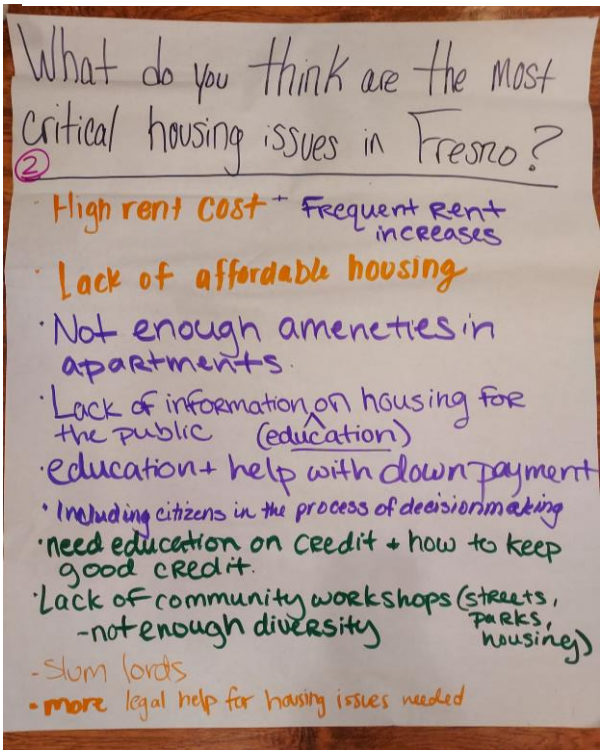
There were 22 community participants that attended the event and about 5 attendees were Spanish monolingual speakers and they received interpretation from Linguistica. Attendees expressed that some of the most critical issues in Fresno are related to affordability, lack of information and education, and lack of community amenities. Participants identified a number of special needs groups including residents with low incomes, undocumented residents, seniors, single-parent families, people with disabilities and mental disabilities, and college students/youth. When asked about Fresno's most significant fair housing issues, participants alluded to historical disinvestment in southwest and west Fresno, access to credit, housing costs, and access to opportunities. Participants expressed support for building more affordable housing and suggested the City develop more programs to provide financial assistance to low-income families, funding to rehabilitate homes, rent control, and more housing near amenities like grocery stores. Participants also made suggestions for increasing community involvement in the Housing Element update. Below is a summary of feedback, along with responses to discussion questions.

Summary of Feedback

- **What are Fresno's greatest assets?**
  - Citizens of Fresno
  - Culture
  - Zoo
  - Desire for change
  - Diversity
  - Diversity in sports
  - Water parks
  - Different public events
  - Proximity to other places (i.e., San Francisco, Los Angeles)
  - The community
  - The people
  - Labor force
  - People

- **What do you think are the most critical housing issues in Fresno?**
  - Frequent rent increases
  - High cost of rent
  - Lack of affordable housing
  - Not enough amenities in apartments
  - Lack of information and education on housing
  - Down payment assistance
  - Including citizens in decision making
  - Need enough diversity
  - Slum lords
  - Education on credit and how to keep good credit
  - Lack of community amenities (parks, trees, housing)
- **What groups within the community have the greatest housing needs?**
  - Low to moderate income
  - Undocumented residents
  - Seniors
  - Single parent families
  - People with disabilities
  - People experiencing homelessness
  - People without transportation or a car
  - College students/youth
  - Couch surfers/people living out of cars
  - People with mental disabilities
  - Veterans
  - Underserved communities

Figure 1E-6.2: Participant Responses "What do you think are the most critical housing issues in Fresno?

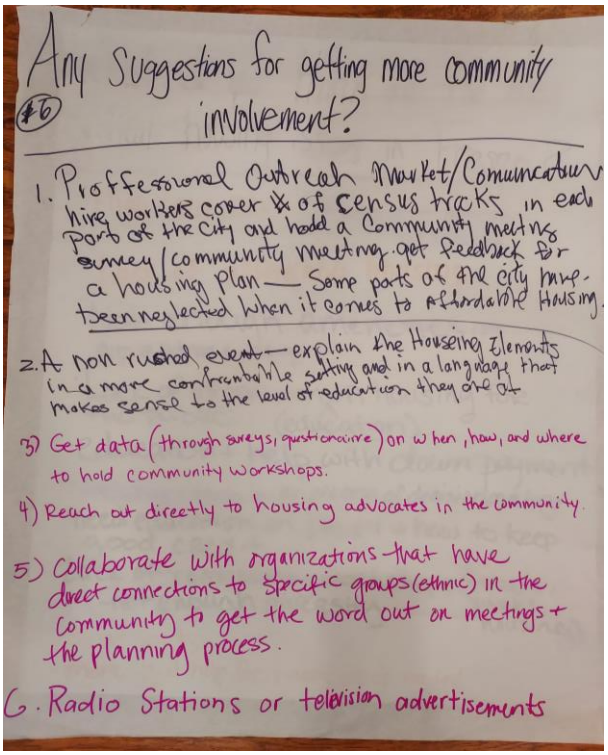


- **What are Fresno's most significant fair housing issues?**
  - Historical disinvestment in southwest and west Fresno
  - Access to credit
  - Access to housing close to amenities
  - Racial barriers
  - High rental cost
  - City of Fresno should implement recommendations 1-48 from "Here to Stay" report
  - Affordable housing and rentals are mostly located in southeast Fresno, where a lot of growth is happening, concerns regarding pricing out and displacement
  - Fair housing for all, not just some
  - More housing for families on fixed incomes with a cap on rent increases
  - More accessible housing for people with disabilities
- **Any suggestions for addressing housing issues in Fresno?**

- Building more affordable housing – start with meeting RHNA numbers from 5th cycle
- Provide more financial assistance to low-income families who have a hard time paying for housing – both renters and owners
- Restoration program for people who live in older sections of town
- Funding to rehabilitate homes and weather updates, such as solar
- Rent control
- More mixed use
- Build up, not out
- Provide more housing near amenities, especially grocery stores
- "Affordable" housing isn't affordable for low-income residents
- Not enough people buy to live here, people buy to profit

- **Any suggestions for getting more community involvement?**
  - Hire a professional outreach or marketing firm, hire people to canvas in each census tract and hold community meetings there, have a survey, get feedback for housing plans
  - Have a non-rushed event, take time to workshop more what the housing element is in a calmer and more relaxing environment, with language people can understand
  - Get data on how to best hold workshops (Who, what, when, where)
  - Reach out to housing advocates in the community
  - Work with organizations that have direct access to and with citizens and special needs households
  - Radio/TV ads
  - Community outreach and meeting community members where they are at
  - Build trust in providing more transparency and accountability
  - Involve Council and City Staff in getting information out

Figure 1E-6.3: Participant Responses to "Any suggestions for more community involvement?"



Events #2-10: Community and Stakeholder Meetings (October/November 2022)

Between October 27, and November 28, 2022, a series of joint community meetings were held by the City of Fresno Long Range Planning Division and the Housing Division to gather feedback from community members and stakeholder organizations about the Multi-Jurisdictional Housing Element and the Annual Action Plan. The format of the meetings included a presentation at the beginning, followed by 6 subject specific staff facilitated tables (Public Infrastructure and Facilities, Fair Housing/Compliance, Public Services, Homelessness and Homelessness Prevention, Affordable Housing, and Housing Element) where the public shared their thought on each subject, then the staff member at each table shared with the larger group the key points shared at their table, and the meeting concluded with each participant voting on their highest priorities. Community members were invited to vote on suggestions at virtual and in-person meetings. The goals, and activity suggestions, are outlined below to provide a high-level overview of input received.

Summary of Feedback

Affordable Housing

- **Most Popular Suggestions**
  - Homebuyer assistance and more extensive funding programs which allow people to build their own homes.
  - Purchasing buildings (with a preference for abandoned buildings and homes) for emergency shelters with additional wrap-around services (e.g., vocational training, addiction services).
  - Developing multi-family housing.
  - Encouraging mixed-income neighborhoods.
  - Affordable housing location equity, specifically north of Shaw Avenue.
  - Tiny home villages in coordination with local religious institutions that own undeveloped land.
  - Ideally small projects (1-4) homes.
  - CDCs as managers of the villages.
  - Allow development of mobile tiny homes.
  - Received feedback from Habitat for Humanity and Poverello that tiny homes are expensive and time consuming to develop.
  - Housing targeting those with mental health needs.
  - Rent control.
  - Reducing bureaucratic processes to fast-track affordable housing.
  - In Chinatown, develop the single-room, second floor apartments above businesses.
  - Mitigation fund – pays a percentage of large repairs necessitated by high-risk renters.
  - Change covenant from 30 years to 50 years.
  - Consider the Community Land Trust Model for long-term affordability. Partner with Central Valley Land Trust for development areas.
  - Improved technical assistance for developers looking to complete proposals.
  - Provide feedback on proposals so they can be made better in the future.

- Provide an opportunity for developers to pitch projects to evaluate whether changes to zoning or permitting are necessary.
- Extending impact fee reduction waiver (expires in June).
- Inclusionary zoning.
- Roommate matching.
- Inclusionary housing.
- Housing co-op for ownership in apartments and condos.
- Rent Controls/ Rental stabilization program/ Rent controls in mobile home parks.
- Weatherization program.

- **Additional Suggestions**

  - Prioritization tool for infrastructure.
  - Provide affordable student housing near campuses and near high quality transit. Engage with Fresno State. (Parent/family housing)
  - Housing for veterans, seniors, and people with disabilities.
  - Housing rehabilitation.
  - Conference between City and lenders to discuss current programs operated by local banks.
  - Leverage funds for affordable housing development.
  - Increase efforts and funding towards developing relationships with the larger organized groups (trusted messengers) such as CDCs to improve public participation.
  - Presenting to Executive Directors and workshopping/piloting new projects (continuous feedback/ capacity building).

Fair Housing/Compliance

- **Most Popular Suggestions**
  - Landlord/owner education on vouchers and more incentives to accept Section 8 (HCV) vouchers.
  - Education about the Annual Action Plan process via trusted messengers like pastors CBO leaders.
  - Work with Office of Community Affairs and place-based organizations.
  - Report out environmental impact of development throughout Fresno.

- **Additional Suggestions**

  - Assistance with helping tenants to understand lease terms.
  - Improved outreach via social media (paid advertisements).
  - Outreach via water bill inserts.
  - Eviction Protection Program continuation.
  - Focus on LGBTQ+ rights in housing.
  - Regular roundtable meeting with community leaders.
  - Increased online access to ongoing/current information.
  - Better promotion of ongoing/current info via social media.
  - Landlord registry to combat slumlord issues.
  - Fair Housing hotline.

Homelessness and Homelessness Prevention

- **Most Popular Suggestions**
  - Rental and utility assistance based on income, housing stabilization (e.g., building credit scores, providing security at buildings). Also programs to offset apartment application fees.
  - Landlord engagement to prevent evictions.
  - Mobile medical clinic in partnership with neighborhood-specific organization to determine locations and resource hubs.
  - Mobile MAP Point pilot project to reduce transportation barriers.
  - More street outreach including social workers and psychologists (non-sworn officers).
  - Long-term shelter options for families.
  - Expanding hours/temperature requirements at warming centers.
  - Don't convert City-owned shelters.
  - More overnight shelters for families.
  - Skilled nursing facilities for those who can't afford them.
- **Additional Suggestions**
  - Safe locations to camp or park vehicle overnight.
  - Include wrap-around services in these locations.
  - More case managers at all shelter locations.
  - Better/more utilization of City resources and collaboration with other agencies.
  - Like coordinating with DMV to provide IDs remotely or via mobile station.
  - Facility where people can exchange needles, NARCAN is available, and all hygiene products are available.
  - Streamlining process to get people into permanent shelter.
  - Provide more "non-shelter." Options for individuals experiencing homelessness (stigma of shelters). Permanent support housing.

Events #11-15: Community Workshops (February/March 2023)

Five meetings were organized and facilitated by Every Neighborhood Partnership (ENP) and the Fresno Community Economic Development Partnership (CEDP) Community Development Corporations (CDC). A total of 131 members of the community attended the five meetings.

Facilitators or City staff delivered a presentation of the Housing Element then community members were invited to participate in an activity to discuss the following four questions: Critical Housing Issues, Most Impacted Groups, Suggestions and Solutions, and Programs Missing from the Fresno Housing Element. All the meetings had the same presentation, but not all used the same format of asking questions. Hidalgo, Lowell, and Southwest had each question on a poster for participants to write their response on directly or via a post-it note. At the Southwest workshop, the last framing question was reworded to be Southwest specific, "What were the most significant housing issues in Southwest?" With this distinction, the methodology provided by these communities that engaged with the poster activity were much more concise. El Dorado's outreach data was gathered through recorded staff notes that documented the community discussion. Highway City's outreach data was taken from written notes from table discussion leaders and participant post-it notes recorded into a Word document. They had a very open discussion on housing issues, needs, and solutions in Fresno and their comments were placed into framing questions after the fact. This adds a level of subjectivity since the participants were not specifically asked the framing questions at the meeting.

Figure 1E-6.4: One of the Five Community Workshops for the Housing Element Update



The comments collected at the events were grouped into common categories to organize and document every participant's feedback. Then each category was scored based on frequency to track which concerns were the most prevalent and reoccurring. While the five communities chosen shared some glaring similarities the data also indicates there are also unique concerns between the way each community prioritized them. As an example, even though one community may not prioritize the unhoused population during question 2 of "impacted communities", there was interest for providing housing to the unhoused population in response to question 3.

Many responses were very passionate and offered multiple points that fit multiple categories. Which made it difficult to fit into one subject. This posed a challenge on whether to include the full comment as one "tallying point" or to break it up into multiple categories. Directing instructions to the public also affected response accuracy as sometimes participants answered all framing questions in one comment and placed it separately from the directed framing question. These factors, together with the potential for a degree of human error, may impact how the values are calculated slightly, but the results still represent the main concerns of the community proportionally.

Summary of Feedback

The high-level themes are placed in order by the total number of comments provided in parenthesis, from high to low. The numbers provided represent the frequency of the responses provided.

- **Critical Housing Issues**
  - Lack of affordable housing (50)
  - Rental instability and barriers (36)
  - Infrastructure needed (19)
  - Lack of equity, representation, and communication (15)
  - Housing ownership and programs to assist (12)
  - Homelessness (10)
  - Low density urban sprawl (4)
  - Lack of amenities nearby (3)
  - Health impacts of housing next to industrial developments (2)
- **Most Impacted Groups**
  - Low-income (23)
  - Renters (18)
  - Homeless (16)
  - Age (15) – students, seniors, youth, and multi-generation
  - Household Type (13) – single, families, single parent families, and long-time residents of Fresno
  - Undocumented or Immigrants (10)
  - Ethnicity (7) – Minorities, BIPOC, and single white female
  - Disabled (7)

  - Middle-Income (5)
  - Gender (5) – women and single mothers

- **Suggestions and Solutions**
  - Build new buildings and repurpose/restore old ones (42)
  - Establish rent controls, tenant assistance and protections, and reduce barriers (28)
  - Provide financial assistance and incentives (25)
  - Create new policies and programs (20)
  - Build new and fix existing infrastructure in existing neighborhoods (18)
  - Engage in research and education (13)
  - Create community first buying options (9)
  - Pursue equity and equal representation (7)
  - Develop partnerships (6)
  - Rezone to create more opportunity for housing (6)
  - Increase code enforcement and safety (6)
  - Address homelessness (1)
- **Recommended Programs for the Fresno Housing Element**
  - Establish programs for home and utility improvements (7)
  - Provide rental assistance (4)
  - Improve tax practices to support housing (4)
  - Provide financial assistance and incentives (3)
  - Invest in the community (3)
  - Promote walkable and safe environments (2)
  - Provide education (2)
  - Seek grant funding (2)

Events #16-21: Community Workshops on the Public Review Draft (July/August 2023)

City staff organized, facilitated, and assisted with public outreach and engagement for six community workshops in July and August 2023 to receive input on the Public Review Draft Housing Element. Five of these meetings were held in collaboration with ENP and the CEDP CDCs. To expand the participation beyond the CEDP boundaries, City staff sent out four citywide email blasts with a reach of 27,000 resident subscribers with an average open rate of 60 percent. Four social media posts were also shared with 33,000 city-based followers.

A total of 166 members of the community attended the six meetings which took place during the 30-day public comment period (July 17 to August 16) on July 20, July 22, July 28, August 3, August 8, and August 9. City staff provided a high level summary of the draft Housing Element, focusing on the actions and programs outlined in the document and how the programs relate to the community's input from earlier workshops. There were group and breakout discussions where participants were asked to provide feedback on the programs provided in the Housing Element, to share thoughts, suggestions, and solutions to critical housing issues facing residents, and to share any other general comments. The City received almost 200 comments at the various workshops. These comments are summarized below.

Figure 1E-6.5: One of the Six Community Workshops for the Draft Housing Element Update



Summary of Feedback

The comments collected at the workshops were grouped into common categories to organize and document every participant's feedback. The high-level themes are placed in order by the total number of comments provided in parenthesis, from high to low. The numbers provided represent the frequency of the responses provided.

- **Most Popular Suggestions (total number of comments made):**
  - Provide rent control, assistance, and protection (14)
  - Opposition to **Program 2** - Variety of Housing Opportunities in High Resource Areas, and revise applicability to growth areas only (11)
  - Provide street paving, lighting, and sidewalk improvements (11)
  - Increase assistance to and opportunities for people struggling with homelessness (9)
  - Improve/diversify public outreach (6)
  - Provide homebuyers assistance and funding for undocumented/non-resident with ITIN (6)
  - No to urban sprawl (5)
  - Opposition to **Program 3** - Encourage and Facilitate Accessory Dwelling Units, in established neighborhoods (5)
  - Support for **Program 3** - Encourage and Facilitate Accessory Dwelling Units, and expand incentives/add funding for residents to develop ADUs (5)
  - Reduce or eliminate on street "no parking" hours (4)
  - Guarantee Section 8 voucher holders have place to rent (3)
  - Improve/increase housing regulations (3)
  - Increase community amenities investment (3)
  - Add inclusionary zoning program (2)
  - Add workforce housing program and funding (2)
  - Provide affordable housing (2)
  - Provide amenities in established neighborhoods north of Herndon (2)
  - Support for mixed-income housing in neighborhoods (2)
  - Support for **Program 29** - Opportunity to Purchase Act, and add non-Fresno resident property restrictions (2)
- **Support for the Housing Element Action Plan Programs:**
  - Support for all Housing Element Programs
  - Support for **Program 2** - Variety of Housing Opportunities in High Resource Areas
  - Support for **Program 16** - Community Land Trust
  - Support for **Program 22** - Housing Rehabilitation, and include more than senior housing
  - Support for **Program 23** - Comprehensive Code Enforcement, and fine residents who don't maintain a clean front year and patio
  - Support for **Program 24** - Special Needs Housing, and expand emphasis on elderly assistance
  - Support for **Program 25** - Development Code Amendments for Compliance with State Law and to Reduce Barriers to Housing Development

- Support for **Program 26** - Fair Housing Services
- Support for **Program 28** - Reduce or Waive Fees for Vehicle Miles Travelled (VMT), and modify for infill only
- Support for **Program 30** - Mobile Home Parks, and add mobile homes built prior to 1980
- Support for **Program 31** - Eviction Protection Program, and expand funding

- **Request to Add to the Housing Element Action Plan Programs:**
  - Add educational training program for small scale developer and City resource access
  - Add farmworker housing program
  - Add homeless Tiny Home Village development program
  - Add large foreign company property restrictions
  - Add program for new homes for Veterans like what Clovis has done on Sunnyside Avenue
  - Add SB10 Overlay program
  - Allow more than one ADU on a property
  - Assess the number of at-risk of homeless youth and meet their housing needs
  - City take/purchase slumlord apartments
  - Clarify rent protection strategies
  - Conduct Zoning and lending practices study
  - Establish a rent remediation board
  - Force large scale developers to sell property to individual homeowners
  - Implement Fair Housing
  - Improve oversight of low-income rental units
  - Improve streamlining of affordable housing
  - Increase landlord resources
  - Partner housing programs with employment resources
  - Provide City liaison to help small/local developers
  - Provide Community Benefit Agreements
  - Provide homebuyers assistance and funding for farmers
  - Provide incentives to investors
  - Provide local development incentives and funding for affordable housing development
  - Provide property owner accountability
  - Recruit developers
  - Reduce fees and improve residential permitting experience
  - Request community amenities built around affordable housing
  - Request demolition of dilapidated homes
  - Start a safe parking program like San Diego
  - Vacant land suggestions include build affordable housing, incentivize housing development, and charge an incremental fee

- **Suggestions Provided Beyond the Scope of the Housing Element:**
  - Expand Neighborhood and Placemaking
  - Improve parking regulations

- Improve water quality
- Increase energy conservation
- Provide cleaner neighborhoods
- Provide Code Enforcement reporting protection
- Provide design standards, infrastructure, and amenities
- Provide immigration assistance
- Require property owners to improve look of apartment complexes

- **Support for Different Housing Types:**
  - Support for adaptive reuse
  - Support for live/work units
  - Support for missing middle housing
  - Support for mixed-use development

Climate Adaptation/Environmental Justice Workshops (April-June 2024)

A series of workshops were held across the City as part of the City's Climate Adaptation-Environmental Justice planning. These workshops included discussion and feedback on fair housing and civic engagement, as well as other typical climate adaptation and environmental justice topics. The workshops were held in or near the R/ECAP neighborhoods described in Chapter 3, or were attended by residents from R/ECAPS. They were often co-hosted by non-profit organizations that serve the neighborhood. Information about the workshops is listed below. These workshops were also listed in the outreach summaries for each of the R/ECAPs in Chapter 3:

- April 23, 2024, Co-Host: Fresno Interdenominational Refugee Ministries (FIRM)
  - Location: FIRM Offices/1940 N. Fresno Street, Fresno, CA 93703
  - McLane R/ECAP
- June 1, 2024, Co-Host: Fresno State Office of Sustainability
  - Location: Fresno State, 5244 N Jackson Ave, Fresno, CA 93740
  - Near El Dorado Park R/ECAP
- June 18, 2024: Legacy Commons/Fresno Housing
  - Location: Legacy Commons, 2255 S. Plumas Ave, Fresno, CA 93706
  - Southwest Fresno R/ECAP
- June 29, 2024, Co-Host EAH
  - Location: Summer Park Apartments, 1275 S. Winery Ave, Fresno, CA 93727
  - Central Southeast Specific Plan R/ECAP

Summary of Feedback

Feedback indicated the following priorities among the participants:

Fair Housing

- **Encourage a Variety of Affordable Housing Options**. Facilitate the development of new-income-restricted affordable housing, including senior, workforce, student housing, and accessory dwelling units
- **Tenant Protections**. Create protections for tenants who report violations and may experience retaliation
- **Land Use.** Prohibit the development of new uses that produce high amounts of truck traffic, particulate matter, noise and odors adjacent to existing neighborhoods; and prohibit the development of new residential uses adjacent to existing industrial uses.

Programs 2, 3, 16 and **24** address the first bullet; **Program 34** addresses the second one. Regarding the third bullet: Changes were made to **Program 17**, Surplus Public Lands, to remove any inconsistencies in land use. In addition, **Program 27**, Environmental Justice, responds to this concern.

Civic Engagement

- **Increase Transparency and Efficacy**. Increase access to information about proposed projects, allow for feedback to be received through a variety of mediums, and improve communication on how feedback was received and considered.
- **Implement Varied Community Forums**. Provide community members with varied platforms and opportunities to provide feedback and maximize participation, such as through conducting neighborhood-based meetings.

Changes were made to **Program 29**, Equitable Engagement, to address these concerns.

Discussions with Affordable Housing Partners (October 2024)

Prior to finalizing the Housing Element, the City met with Self Help Enterprises, Habitat for Humanity, and Fresno Housing to review the Action Plan and obtain any additional feedback. Concerns mainly focused on streamlining the entitlement and building permit processes and further defining roles regarding community land trusts. As a result of these conversations, revisions were made to the following programs:

- **Program 4:** Streamline Development Review Process
- **Program 11:** Incentives for Affordable Housing
- **Program 14:** Partnerships with Affordable Housing Developers
- **Program 16:** Community Land Trust

Summary of Revisions Made to Address Feedback on the Public Review Draft

In addition to feedback received during the community workshops, the City also received a number of public comment letters on the Public Review Draft Housing Element, which can be found in Section 1E-8, Public Comments Received on the Housing Element. The City reviewed all of the comment letters and workshop comments received, as well as letters directed at the regional level to the Multi-Jurisdictional Housing Element. This feedback helped inform revisions made to the Public Review Draft before submitting to the California Department of Housing and Community Development (HCD) for State-mandated review. To help the reader easily identify revisions made, a track changed version of the draft Housing Element was also released and made available on the City's website and the Multi-Jurisdictional Housing Element website. Below is a high-level summary of revisions made, by chapter, to the Public Review Draft to address public comments.

- **1E-1: Action Plan**. Added an introduction to the Implementation Programs section, with a list of programs, by goal. Revised, modified, and added policies and programs to clarify intent, add additional commitments, and/or clarify objectives and timeframes: Addressed comments related to providing additional commitments regarding Accessory Dwelling Units (ADUs), to clarify timeframes for outreach in annual reporting, to include strategies to build and support the local construction workforce, to address housing rehabilitation needs of the community, to address home repair needs of residents in mobile home parks, and to expand/define outreach commitments to reach lower-income areas and residents in various programs.

- **1E-2: Sites Inventory.** Supplemented the Methodology section to include a recent example of a large site development in the city. Added an environmental constraints and hazards section with a description of relevant environmental constraints and hazards and how it relates to the sites inventory.

- **1E-3: Local Assessment of Fair Housing.** Supplemented various sections to address comments and provide additional context, data, and local knowledge including the Patterns of Integration and Segregation, Disproportionate Housing Needs and Displacement Risk, Access to Opportunity, and Other Relevant Factors and Local Knowledge sections. Updated and refined the list of contributing factors to reflect new information added and changes made to programs.

- **1E-4: Constraints.** Updated chapter to reflect changes made to programs and expanded the discussion of parking requirements in the Parking section.

- **1E-7: Detailed Sites Inventory Tables.** Added a column to the vacant and nonvacant sites inventory tables to identify environmental constraints.

Summary of Revisions Made During HCD Review Process

On February 1, 2024, the City received a comment letter from HCD. City staff and the consultants reviewed the comments closely and made substantial changes to the Draft Housing Element. During the HCD review process, the City received comment letters from Leadership Counsel for Justice and Accountability and one comment from Self Help Housing. Themes from the letters included housing constraints and request for more ministerial approval pathways, tenant protections, conservation of existing affordable housing and mobile homes, strengthening fair housing and environmental justice programs, and encouraging more affordable housing in high resource areas. The Housing Element team reviewed each of the letters and incorporated responses with the revisions made in response to the HCD comment letter.

Changes made to Housing Element Programs in response to these comments include but are not limited to: removing two sites from the inventory based on adjacency to existing industrial uses; increasing commitments in Program 2: Variety of Housing Opportunities in High Resource Areas; additional incentives in Program 3: Encourage and Facilitate Accessory Dwelling Units and Small Homes; further streamlining entitlement processing timelines in Program 4: Streamline Development Review Process; adding incentives for large site development, which are often located in high resource areas, in Program 5: Large and Small Lot Development; adding more incentives and firmer commitments for affordable housing in Program 11: Incentives for Housing Development; modifying Program 14: Partnerships with Affordable Housing Developers to include outreach to lower-income and special needs households; adding commitments to Program 17: Surplus Public Lands; adding commitments to Program 25: Development Code Amendments for Compliance with State Law and to Reduce Barriers to Housing Development; significant revisions to Program 27 – Environmental Justice and Program 28 – Equitable Community Investments to provide more detailed commitments; addressing weatherization needs for mobile home parks in Program 33 – Mobile Home Parks; adding commitments to Program 36: Homeless Assistance, and expanding tenant outreach in Program 37: At-Risk Housing. Comments received on the Housing Element can be found in Section 1E-8, Public Comments Received on the Housing Element.

Planning Commission and City Council Study Sessions (September 2022 and July 2023)

A study session was held with the City Council on September 29, 2022 to discuss the Housing Element Update and process. The study session was open to the public and held in person, with a livestream option to reach members of the public who could not attend in person. CCRH staff supported City staff and presented an overview of the Housing Element update process and required contents of the element, discussed early strategies to meet the City's RHNA, reviewed new state laws, and solicited feedback from the City Council and community members on these strategies and other housing needs in Fresno. Commentary was limited and no public comment related to fair housing was received at the meeting; instead, council members expressed concern regarding the implications of new and changing housing legislation on small cities with limited financial resources.

After release of the Public Review Draft Housing Element, the City held study sessions with the Planning Commission on July 19, 2023, and City Council on July 20, 2023, to review the plan and solicit feedback before submitting to HCD for State-mandated review. These meetings were open to the public and held in person, with a livestream option available to reach those who could not attend in person. Clarifying questions were asked during both study sessions. No public comments were received at the meetings.

Regional Focus Groups (October/November 2022)

Two regional focus groups were held as part of the Housing Element development process to receive a broad range of input from local and regional stakeholders including staff, community organizations and non-profits, and project consultants. Stakeholders were presented with information about the Housing Element process, particularly sections regarding community needs and fair housing, and were given the opportunity to weigh in on community needs. The first Regional Stakeholder Focus Group Meeting was held on Tuesday October 25th from 9:30 to 11:30am and the second Regional Stakeholder Focus Group Meeting was held on Tuesday November 15th from 9:30 to 11:30am.

Stakeholders described the rising cost of housing, the shortage of affordable housing available in the city, multifamily or single-family unit types, as well as the economic disadvantages to market rate developers to build affordable housing. Some key topics that came up as regional housing issues: corporate acquisition of mobile home parks, over-reliance on commercially zoned property to accommodate RHNA (not much higher density zoning in the County relative to commercial), outdated community plans hindering development, and difficulties securing funding for new housing in low resource areas. There was also a fair amount of discussion on the need for more outreach and education to increase awareness/accessibility of existing assistance programs, and financial literacy to help low-income residents better compete for affordable housing/home ownership opportunities.

Regional and Local Stakeholder Consultations (Summer/Fall 2022)

Consultations were conducted with service providers and other stakeholders who represent and/or provide services to different socioeconomic groups in the Fresno County region to obtain input on housing needs and programs. Throughout the summer and fall of 2022, several interviews were conducted with stakeholders who work in areas such as housing, homelessness, and other social services in Fresno and throughout the Fresno County area. The following organizations and stakeholders provided input and below is a summary of the feedback received.

Fair Housing Council of Central CA

Regional outreach efforts for the Multi-Jurisdictional Housing Element included interviewing the Fair Housing Council of Central California (FHCCC), a non-profit, civil rights organization dedicated to the elimination of discrimination in housing and the expansion of housing opportunities for all persons. FHCCC provides a multifaceted program of private enforcement, education and outreach, research and advocacy to affirmatively further the goal of equal housing opportunity in the San Joaquin Valley.

In response to the request for input, FHCC noted that the most common fair housing issues reported throughout Fresno County are discrimination on the bases of disability and race. FHCC emphasized a need for more government involvement in enforcement of fair housing laws. Currently, affordable housing options are often concentrated in specific neighborhoods. When developers are encouraged to continue to build affordable units in these areas as a result of zoning or other government regulations, this results in either intentional or unintentional segregation based on income. When asked about opportunities for local governments to actively improve outreach regarding fair housing and to combat existing issues, FHCC identified several opportunities including local rent controls to manage affordability and reduce displacement risk, code enforcement to ensure a safe and habitable housing stock, funding fair housing groups such as FHCC to enforce fair housing laws, and adjusting regulations or encouraging development of a variety of unit types and sizes throughout the jurisdiction to promote mobility and integration.

Further, they expressed concern about the aging multifamily housing stock becoming uninhabitable due to physical conditions. However, given the shortage of affordable housing in the region, FHCC noted that many units that have already physically deteriorated are still occupied, posing a risk to occupants. Discrimination by landlords or agents as well as deliberate segregation has resulted in fair housing concerns, particularly for protected and special needs populations, such as persons with disabilities and lower-income households.

Fresno Housing Authority

There are two divisions of the Housing Authority operating within the region; one is for the City of Fresno and a separate authority for the rest of the County. Two representatives from the Fresno County Housing Authority were interviewed as part of regional outreach for the Multi-Jurisdictional Housing Element update. The representatives noted that there is tremendous demand for housing in all communities in Fresno County. The last time the Section 8 waiting list opened they received more than 50,000 applications. Recently, when a 60-unit development in Clovis opened, they received more than 10,000 applications. When a project in downtown Fresno opened, they received 4,000 applications within a two-week period. Rents are high, which is challenging for residents but good for developers. The region needs more housing opportunities for people experiencing homelessness but in rural and unincorporated communities, lack of water and sewer capacity are major concerns for additional housing development altogether.

Representatives noted that entitlement processing timelines have been a barrier to development for the Housing Authority. There is also a lack of capacity among agencies that provide services in rural and unincorporated areas. This is especially challenging for special needs populations that need mental health services. The Housing Authority is following the State's lead in providing housing in high opportunity areas. There are lots of incentives to do this to compete for tax credits and other state funding programs.

Fresno Madera Continuum of Care

The Fresno Madera Continuum of Care (FMCoC) is a collaborative of agencies that work together to provide homeless services; however, FMCoC is not a legal entity and does not provide direct services. A representative from the FMCoC provided input on housing needs and programs for the Housing Element. At present, the representative noted that the biggest concern is that there is insufficient low-income housing for those who are homeless (or at risk of becoming homeless). Many people in the region are on a fixed income, including disability or social security, and cannot afford housing.

Llaves De Tu Casa

The Llaves De Tu Casa Iniciativa is a financial education program open to all County of Fresno residents but with a focus on increasing Latino homeownership rates. The partners driving the initiative are NAHREP (National Association of Hispanic Real Estate Professionals) Fresno, the City of Fresno, Federal Home Loan Bank (FHLBank) of San Francisco, Self-Help Enterprises, and Union Bank. As a follow-up to the regionwide stakeholder focus groups held in October and November 2022, a collection of members from the Llaves de tu Casa Iniciativa (LDTC) met on December 13, 2022, to respond to several stakeholder interview questions.

The opportunities for future housing in the region that the initiative members identified included the initiative's ability to provide homeownership education virtually and in partnership with other local organizations. There has been a lack of financial literacy in the community along with challenges in using technology and language barriers. The initiative members expressed concerns about affordability, including the location of affordable housing in undesirable areas. Upzoning single-family zoning would create more opportunities for the development of multifamily housing in more desirable locations. Some funding is only available in certain areas, which can exacerbate existing patterns of segregation and close proximity to industrial uses. They also expressed concern about investors displacing community members in order to establish short-term rentals while community members live in hotels. The State's mandate to install solar panels on new homes was also cited as an additional cost that will drive up the buyers' or renters' cost.

The gap between ownership housing affordability and program income limits was identified as a barrier to accessing housing. Moderate-income households earn too much to qualify for housing assistance, but those who qualify cannot afford the housing available. In addition to a lack of multifamily rental housing, there aren't enough condo buildings in the region, which could present another affordable homeownership strategy. The establishment of land trusts was also identified as a potential strategy for increasing affordability, as well as donations of land from municipalities.

Northern California Carpenters Regional Council (NCCRC)

The Northern California Carpenters Regional Council (NCRCC), also known as the Nor Cal Carpenters Union, is a labor union representing carpenters and other construction trade workers in Northern California. It provides members with training, apprenticeship programs, benefits, and collective bargaining agreements to ensure fair wages and working conditions. The Nor Cal Carpenters Union has a number of committees working for equal rights for all members including women, minorities and veterans, and work to build empowerment and mutual support. A representative from the union provided input on housing needs and programs for the Housing Element update.

The union representative acknowledged that labor unions have not been strong housing advocates in the past, but they are trying to change that dynamic as the housing crisis across the state has created more sense of urgency which is an opportunity for NCCRC because more housing production means more construction jobs for the Fresno community.

At present, NCCRC is concerned that there is a shortage of labor supply to meet that housing need. COVID has had a significant effect on office building construction and NCCRC noted this as an opportunity for construction workers to pivot to residential building, if more favorable working conditions are instituted. Currently, many of the union's members are not a part of residential development because the working conditions are not good. Even with the prevailing wage requirements for affordable housing, NCCRC insinuated that developers are able to work around these requirements to reduce their costs. This is a statewide issue, but the problem is even more pronounced in Fresno, for example, construction workers are 3.9 percent of the total labor force. California-wide construction industry/trades workers are meanwhile 4.3 percent of the total labor force. So, by California standards Fresno does not have, in relative terms, an abundant supply of construction workers. NCCRC would like to see the shortage of labor (both statewide and in Fresno County) identified as a constraint in the Housing Element rather than the cost of labor and would like the Housing Element to include policy language related to a local hiring preference.

Leadership Counsel for Justice and Accountability

The Leadership Counsel for Justice and Accountability (Leadership Counsel) advocates at the local, regional, and statewide levels on the overlapping issues of land use, transportation, climate change, safe and affordable drinking water, housing, environmental justice, equitable investment, and government accountability. Based in the San Joaquin and Eastern Coachella Valleys, Leadership Counsel services include community organizing, research, legal representation, and policy advocacy. Representatives of Leadership Counsel expressed concern about the ongoing sprawl in the city. Stakeholders advocated for investment in existing communities that don't have fair access to clean drinking water. Leadership Counsel strongly urges for actions to affirmatively further fair housing (AFFH) and incorporate into programs. Representatives noted that there is a need for more affordable housing and that the City is not making enough progress toward meeting the very low- and low-income RHNA. Leadership Counsel representatives noted that unmet needs include infrastructure, access to parks, medical centers, roads, transit, schools, etc. Regarding housing conditions, Leadership Counsel representatives noted aging mobile homes and general stock that is not maintained resulting in poor conditions. Leadership Counsel encourages the Housing Element to incorporate policies and programs from the City's recently published Anti-Displacement report. Specific suggestions included long-term rental assistance, tenant protections from landlord retaliation, inclusionary zoning requirements, addressing prior evictions on rental applications, and criminal records on housing applications.

Central Valley Urban Institute

Central Valley Urban Institute (CVUI) is an advocacy organization working throughout the San Joaquin Valley. The organization's goal is to build economic and social mobility for low-income communities. CVUI indicated that opportunities for this Housing Element cycle are to increase affordable housing stock production, particularly within infill areas and brownfields as well as to increase homeownership through programs like the downpayment assistance program. CVUI expressed concerns about high building costs, lack of financing, and poor leadership in the area. Regarding housing needs, CVUI described that community members want intergenerational housing, middle-income housing, and "missing-middle" sized housing. Homelessness was also a primary concern, particularly among college-aged youth. In addition, CVUI noted that there are inadequate opportunities for homeownership or adequate rental housing. The largest barriers are access to credit, lack of financial education, and existing housing cost burden. There is also a lack of investment in programs that serve low to moderate-income communities.

Law Office of Patience Milrod – Civil Rights Attorney

Patience Milrod, a civil rights attorney in the Fresno area, was interviewed to provide feedback on the FCOG Housing Element update. Ms. Milrod supports the continued attention to inclusionary housing and has concerns about the passive language of "facilitate" and "encourage" that have been common in past Housing Elements. She identified poor housing conditions and was adamant about bolstering code enforcement efforts to improve housing quality. With more aggressive code enforcement in place, she suggested that some landlords may decide that the cost of maintaining their property isn't worthwhile and may choose to sell to a community land trust or Habitat for Humanity rather than entering receivership. According to Ms. Milrod, the biggest barrier to finding affordable, decent housing in the region is that lower-cost housing tends to also be low quality or ill maintained. Ms. Milrod offered several suggestions for the Housing Element including:

- Inclusionary housing
- Code Enforcement
- Community Land Trusts
- Mobile home parks protections.
- Work with nonprofits to ensure that they are able to buy before properties go into receivership.
- Instead of "facilitate and encourage" we need specific programs and timelines and responsible parties.

BIA of Fresno/Madera Counties

The Building Industry Association of Fresno/Madera Counties (BIA) is an industry organization that represents builders, developers, subcontractors, and affiliated businesses in the residential, commercial, and industrial building industry throughout the region. BIA identified that the biggest opportunities for housing in the region are increased demand, downpayment assistance and homeowner maintenance programs. BIA expressed concerns about local regulations, including the City of Fresno's Zoning and Development Code. BIA members say that it's hard to get a project through the City's processes, specifically noting convoluted processes, and mitigation measures that go beyond requirements of the California Environmental Quality Act (CEQA). BIA estimates Fresno's processes take six months to a year. This is compared to two months in the City of Clovis. In part because everything has to go through City Attorney's office – even standard agreements. When there is an issue with the agreement, project has to go back to council to fix it. Whereas, there is a delegated authority in other cities.

BIA acknowledged that streamlining tools have helped a little, but not enough. The concern is that the development areas west of Highway 99 are generally rural residential composed of parcels with multiple property owners, annexation limitations, and infrastructure constraints. For market rate housing, the BIA noted that the statewide shift to all-electric utilities rather than gas is a concern because of vehicle miles traveled (VMT) regulations. Across the FCOG region, public transit isn't reliable, and a car is necessary to get around. Builders have to pay a fee to get around the cost of mitigating car miles unless city councils can make a finding of an unavoidable impact. For affordable housing, the prevailing wage requirements are a barrier to development due to the increased cost. Infrastructure costs also affect both types of projects. Streamlining tools help control costs, but not enough. A lack of local water access is also a barrier to development. BIA expressed concern that the State assigned the RHNA without this in mind because there may not be enough water access to support the housing development that the State is looking to see.

In BIA's experience, apartments are in demand but single-family homes are in the greatest demand. There is a lot of demand for low-income housing projects, but these aren't financially viable for developers without government subsidy. However, including government subsidy in projects increases the overall cost to build, as it triggers prevailing-wage requirements. A recent affordable development in the City of Fresno at Blackstone Avenue and McKinley Avenue cost around $400,000 per unit to build.

Resources for Independence Central Valley

Resources for Independence, Central Valley (RICV) is 1 of 28 Centers for Independent Living in California. Independent Living Centers, like RICV, are community-benefit, nonprofit organization run by and for persons with disabilities. RICV provides a foundation of core consumer-controlled, community-based, cross-disability and person-focused programs and assistance. A representative from RICV provided written feedback on housing needs and programs for the Housing Element. The representative expressed concern about laws in the City of Fresno that prevent homeless community members from camping or living in their cars. Homelessness is increasing, but the City is investing resources in enforcing these laws rather than providing assistance. There is funding to move homeless people around, but not to improve anyone's living situation.

Additionally, affordability limits are causing challenges for residents to qualify for affordable housing. Community members with disabilities in Fresno experience additional challenges trying to find homes that have necessary accessibility features. For renters, these improvements may be more challenging to implement, and those who use service or support animals may experience discrimination against pets. Homeowners with disabilities end up needing to make expensive home improvements in order to make their homes accessible for themselves. RICV also noted stated that there is a lack of diversity in the housing stock and that the region needs more townhomes, condominiums, and entry level housing options. Higher density housing near transit or major transportation corridors can provide more opportunities for ADA housing accommodations and designs.

Regarding equity and fair housing, RICV identified access to credit and credit checks as a barrier to fair housing choice and/or equitable access to opportunity. In addition, RICV described language barriers as a barrier when it comes to applying for housing and not being able to get information or communication with property management. Generally, the lack of affordability for lower income households is the largest concern as rental housing can require deposit and/or income requirements that are unattainable.

Noticing

Per California Government Code Section 65585, the draft Housing Element was made available for public comment for 30 days. The draft was made available on the City's website and was noticed to residents through the same methods as the Planning Commission and City Council meetings. Additional direct noticing was sent to local housing advocate groups.

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SECTION 1E-7: DETAILED SITES INVENTORY TABLES

Table 1E-7.1: Capacity on Vacant Sites, City of Fresno, September 2024

Site ID	APN	Address	Size (acres)	General Plan Land Use Designation	Zoning	Assumed Density (per acre)	Units	Income Level	In 5th Cycle Housing Element?	Environmental Constraint
1	57907541		49.44	Residential - Medium Low Density	RS-4	4.8	237	Above Moderate	YES	
2	57907542		11.45	Residential - Medium Low Density	RS-4	4.8	55	Above Moderate	YES	
3	57907540		4.02	Residential - Medium Low Density	RS-4	4.8	19	Above Moderate	YES	
5	57939055S		14.00	Residential - Medium Low Density	RS-4	4.8	67	Above Moderate	YES	FEMA 100-year flood zone
6	57907547		3.59	Residential - Medium Low Density	RS-4	4.8	17	Above Moderate	NO	
7	57939062S		15.87	Residential - Low Density	RS-3	3.3	53	Above Moderate	YES	FEMA 100-year flood zone
8	57939063S		39.93	Residential - Medium Density	RS-5	8.4	335	Above Moderate	YES	
9	57939006S		2.65	Residential - Medium Density	RS-5	8.4	22	Above Moderate	NO	
10	57939047S		9.07	Residential - Low Density	RS-3	3.3	30	Above Moderate	NO	FEMA 100-year flood zone
11	57939064S		2.95	Residential - Medium Low Density	RS-4	4.8	14	Above Moderate	NO	
14	57937003S	2458 E COPPER RIDGE DR	0.46	Residential - Low Density	RS-3	3.3	1	Above Moderate	NO	
15	57937004S	2442 E COPPER RIDGE DR	0.53	Residential - Low Density	RS-3	3.3	1	Above Moderate	NO	
16	57937005S	2426 E COPPER RIDGE DR	0.34	Residential - Low Density	RS-3	3.3	1	Above Moderate	NO	
17	57937025S	2346 E COPPER RIDGE DR	2.05	Residential - Low Density	RS-3	3.3	7	Above Moderate	NO	
18	57926016S	2230 E SPEY VALLEY DR	1.54	Residential - Low Density	RS-3	3.3	5	Above Moderate	NO	
19	57926015S	2209 E SPEY VALLEY DR	0.82	Residential - Low Density	RS-3	3.3	1	Above Moderate	NO	
20	57939001S		4.92	Residential - Medium Density	RS-5	8.4	41	Above Moderate	YES	
23	57926007S	11286 N GLASGOW DR	0.59	Residential - Low Density	RS-3	3.3	1	Above Moderate	YES	
24	57926006S	11289 N GLASGOW DR	0.52	Residential - Low Density	RS-3	3.3	1	Above Moderate	YES	
25	57927010S	2192 E STRATHSPEY WAY	0.49	Residential - Low Density	RS-3	3.3	1	Above Moderate	YES	
26	57927008S	2167 E STRATHSPEY WAY	0.48	Residential - Low Density	RS-3	3.3	1	Above Moderate	YES	
27	57927002S	11215 N GLASGOW DR	0.53	Residential - Low Density	RS-3	3.3	1	Above Moderate	YES	
28	57927004S	2163 E ABERDEEN WAY	0.73	Residential - Low Density	RS-3	3.3	1	Above Moderate	YES	
29	57922071S		4.59	Residential - Urban Neighborhood	RM-2	18.0	83	Lower	NO	
	57922033S								NO	
30	57915019S	11363 N SANDHAVEN AVE	0.50	Residential - Low Density	RS-3	3.3	1	Above Moderate	YES	
31	57940129S	11333 N ALICANTE DR	2.00	Residential - Urban Neighborhood	RM-2	18.0	36	Lower	NO	
32	57941055S		2.54	Residential - Urban Neighborhood	RM-2	18.0	46	Lower	YES	
33	57942028S	11563 N VIA CAMPAGNA DR	0.12	Residential - Medium High Density	RM-1	13.6	1	Moderate	YES	
34	57942029S	11569 N VIA CAMPAGNA DR	0.12	Residential - Medium High Density	RM-1	13.6	1	Moderate	YES	
35	57942030S	11575 N VIA CAMPAGNA DR	0.19	Residential - Medium High Density	RM-1	13.6	1	Moderate	YES	
36	57942031S	11568 N VIA CAMPAGNA DR	0.18	Residential - Medium High Density	RM-1	13.6	1	Moderate	YES	
37	57938202S	1955 E PIN HIGH DR	0.17	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	YES	
38	57938203S	1967 E PIN HIGH DR	0.17	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	YES	

Site ID	APN	Address	Size (acres)	General Plan Land Use Designation	Zoning	Assumed Density (per acre)	Units	Income Level	In 5th Cycle Housing Element?	Environmental Constraint
39	57945032S	11739 N TURF DR	0.18	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	YES	
40	57945010S	11793 N CHAMPIONS DR	0.18	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	YES	
42	57945023S	11702 N LINKS DR	0.17	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	YES	
43	57918005S	11634 N DEVONSHIRE AVE	0.37	Residential - Low Density	RS-3	3.3	1	Above Moderate	YES	
44	57918006S	11598 N DEVONSHIRE AVE	0.41	Residential - Low Density	RS-3	3.3	1	Above Moderate	YES	
45	57917008S	11572 N DEVONSHIRE AVE	0.50	Residential - Low Density	RS-3	3.3	1	Above Moderate	YES	
46	57819019S	2552 E SARAZEN AVE	0.38	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	YES	
47	57819003S	2537 E PRESTWICK AVE	0.34	Residential - Low Density	RS-3	3.3	1	Above Moderate	YES	
48	57727041	1809 E HOGAN AVE	0.37	Residential - Low Density	RS-3	3.3	1	Above Moderate	YES	
49	57727046	10834 N MERIDIAN AVE	0.34	Residential - Low Density	RS-3	3.3	1	Above Moderate	YES	
50	57727045	1937 E HOGAN AVE	0.44	Residential - Low Density	RS-3	3.3	1	Above Moderate	YES	
51	57814041S	2047 E AJIT LN	0.36	Residential - Low Density	RS-3	3.3	1	Above Moderate	YES	
52	57814042S	2071 E AJIT LN	0.37	Residential - Low Density	RS-3	3.3	1	Above Moderate	YES	
53	57814043S	2093 E AJIT LN	0.38	Residential - Low Density	RS-3	3.3	1	Above Moderate	YES	
54	57801005		2.33	Residential - Low Density	RS-3	3.3	8	Above Moderate	YES	
55	57624118S	922 E RIDGECREST DR	0.28	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	YES	
56	57624125S	10780 N HAMPSHIRE DR	0.26	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	YES	
57	57724403S	1067 E TURNBERRY AVE	0.33	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	NO	
58	57724409S	1163 E TURNBERRY AVE	0.33	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	YES	
59	57720027S	1297 E CARLYLE WAY	0.45	Residential - Low Density	RS-3	3.3	1	Above Moderate	YES	
60	40263122	204 W BLUFF AVE	0.53	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
61	40260215	251 W HUBERT CT	0.31	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	YES	
62	40261004	207 W BRIER CIR	0.19	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
63	40108204	9201 N STONERIDGE LN	0.20	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	YES	
64	40355229S		0.45	Residential - Medium Low Density	RS-4	4.8	2	Above Moderate	YES	
65	40302208	8645 N MAPLE AVE	2.63	Residential - Medium Low Density	RS-4	4.8	13	Above Moderate	NO	
66	40402102		4.52	Residential - Urban Neighborhood	RM-2	18.0	81	Lower	YES	
67	40408301		0.20	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
68	408153X54		0.62	Residential - Medium Density	RS-5	8.4	5	Above Moderate	YES	
69	30363021	131 W NEES AVE	1.64	Residential High Density	RM-3	36.0	55	Lower	YES	
70	30303133	7388 N INGRAM AVE	0.16	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
71	30303110		0.14	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
72	30307101		0.15	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
73	30307102	481 W MINARETS AVE	0.13	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
74	30311125	445 W SPRUCE AVE	0.22	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
75	30311216		0.14	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
76	30314102	7078 N INGRAM AVE	0.13	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
77	30314103		0.14	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	

Site ID	APN	Address	Size (acres)	General Plan Land Use Designation	Zoning	Assumed Density (per acre)	Units	Income Level	In 5th Cycle Housing Element?	Environmental Constraint
78	30314115	440 W BEECHWOOD AVE	0.14	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
79	30314324S	350 W BEECHWOOD AVE	0.14	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
80	30311310	311 W SPRUCE AVE	0.14	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
81	30307334	352 W BIRCH AVE	0.14	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
82	30307343		0.13	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
83	30303404		0.14	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
84	30304139	269 W ALLUVIAL AVE	0.15	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
85	30304242	263 W PINEDALE AVE	0.21	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
86	30308115	7287 N SAN PABLO AVE	0.13	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
87	30308121		0.22	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
88	30315105	261 W FIR AVE	0.14	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
89	30315124		0.22	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
90	30316601	25 W BEECHWOOD AVE	0.15	Corridor - Center Mixed Use	CMX	37.50	6	Above Moderate	NO	
91	30316149		0.15	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
92	30316147	57 W FIR AVE	0.15	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
93	30316146	69 W FIR AVE	0.22	Residential - Medium Density	RS-5	8.4	2	Above Moderate	NO	
94	30309242		0.22	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
95	30309245	130 W SPRUCE AVE	0.29	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
96	30309231	163 W BIRCH AVE	0.14	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
97	30309171		0.19	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
98	30305211	102 W MINARETS AVE	0.13	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
99	30305308		0.15	Corridor - Center Mixed Use	CMX	37.50	6	Above Moderate	YES	
100	30305417	7328 N SUGAR PINE AVE	0.14	Corridor - Center Mixed Use	CMX	37.50	5	Above Moderate	YES	
101	30305418		0.28	Corridor - Center Mixed Use	CMX	37.50	10	Above Moderate	YES	
102	30305406	7315 N BLACKSTONE AVE	0.30	Corridor - Center Mixed Use	CMX	37.50	11	Above Moderate	NO	
103	30306225		0.69	Corridor - Center Mixed Use	CMX	37.50	26	Lower	YES	
	30306226	51 E PINEDALE AVE								
	30306209	67 E PINEDALE AVE								
	30306210	75 E PINEDALE AVE								
	30306208	57 E PINEDALE AVE								
104	30320127	7354 N ABBY ST	7.76	Commercial - Regional	CR	40.00	260	Lower	NO	
105	40535095S		2.02	Residential Low Density	RS-2	2.0	4	Above Moderate	YES	
106	40552309S	2016 W ALLUVIAL AVE	0.69	Residential Low Density	RS-2	2.0	1	Above Moderate	YES	
107	40551012S	7512 N HIGHGROVE LN	0.46	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
108	40551011S	7536 N HIGHGROVE LN	0.51	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
109	40558044	2227 W THOMASON PL	0.61	Residential Low Density	RS-2	2.0	1	Above Moderate	YES	
110	40558045	2221 W THOMASON PL	1.64	Residential Low Density	RS-2	2.0	3	Above Moderate	NO	
111	40505016	7439 N SEQUOIA DR	0.96	Residential Low Density	RS-1	0.8	1	Above Moderate	YES	

Site ID	APN	Address	Size (acres)	General Plan Land Use Designation	Zoning	Assumed Density (per acre)	Units	Income Level	In 5th Cycle Housing Element?	Environmental Constraint
112	50028001S	7379 N VAN NESS BLVD	1.16	Residential Low Density	RS-1	0.8	1	Above Moderate	YES	
113	40720402	6559 N MAROA AVE	2.56	Residential - Medium High Density	RM-1	13.6	35	Moderate	YES	
114	40717310	157 W MENLO AVE	0.21	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	YES	
119	41707056		0.66	Residential - Medium Density	RS-5	8.4	6	Above Moderate	YES	
120	41714021	614 W SAN JOSE AVE	1.05	Regional Mixed-Use	RMX	45.0	47	Lower	NO	
121	41723120	575 W SAN JOSE AVE	2.29	Regional Mixed-Use	RMX	45.0	103	Lower	NO	
122	41845014		5.52	Regional Mixed-Use	RMX	45.0	248	Lower	NO	
124	41806054	83 E BARSTOW AVE	2.36	Regional Mixed-Use	RMX	45.0	106	Lower	YES	
125	41808085		1.81	Regional Mixed-Use	RMX	45.0	82	Lower	YES	
126	41808082		2.36	Regional Mixed-Use	RMX	45.0	106	Lower	YES	
128	42509103		0.34	Corridor - Center Mixed Use	CMX	37.50	13	Above Moderate	YES	
129	42509213	63 W SHAW AVE	2.25	Corridor - Center Mixed Use	CMX	37.50	84	Lower	NO	
130	41806052	251 BARSTOW AVE	3.30	Residential - Medium High Density	RM-1	13.6	45	Moderate	NO	
131	41820145		0.61	Corridor - Center Mixed Use	CMX	37.50	23	Lower	YES	
133	41818322	488 E SAN JOSE AVE	0.23	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	YES	
134	41809131	659 E KEATS AVE	0.16	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
135	41809134	687 E KEATS AVE	0.15	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
136	41809118		2.34	Corridor - Center Mixed Use	CMX	37.50	88	Lower	YES	
137	41809124	1066 E SHAW FR	1.16	Corridor - Center Mixed Use	CMX	37.50	43	Lower	NO	
138	42707140		0.29	Corridor - Center Mixed Use	CMX	37.50	11	Above Moderate	YES	
139	41814108		0.23	Residential - Low Density	RS-3	3.3	1	Above Moderate	YES	
140	41814502	1315 E PORTALS AVE	0.22	Residential - Low Density	RS-3	3.3	1	Above Moderate	YES	
141	41816102S	1319 E SAN RAMON AVE	0.18	Residential High Density	RM-3	36.0	1	Above Moderate	YES	
142	41816106S	1357 E SAN RAMON AVE	0.18	Open Space - Community Park	RM-3	36.0	1	Above Moderate	NO	
143	41816306S	1470 E BULLDOG LN	0.79	Residential High Density	RM-3	36.0	27	Lower	YES	
144	43012039		0.37	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	YES	
145	43012042	4341 E SAN GABRIEL AVE	0.34	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	YES	
146	43011050	4527 E ALAMOS AVE	0.40	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	YES	
	43014063	4651 N BARTON AVE	0.33				1	Above Moderate	YES	
147	43009043		0.37	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	YES	
	43015015		0.26			4.8	1	Above Moderate		
148	43016121	4561 N ARCHIE AVE	0.23	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
149	43032226		0.21	Corridor - Center Mixed Use	CMX	37.50	8	Above Moderate	YES	
150	43038131	4516 N CHESTNUT AVE	1.12	Residential - Medium High Density	RM-1	13.6	15	Moderate	YES	
151	43039135		0.95	Residential - Medium Density	RS-5	8.4	8	Above Moderate	YES	
152	43021007	4783 E AUSTIN WAY	0.90	Residential - Medium High Density	RM-1	13.6	12	Moderate	YES	
153	42517217	4819 N BLACKSTONE AVE	0.69	Corridor - Center Mixed Use	CMX	37.50	26	Lower	YES	
154	42708120		0.79	Corridor - Center Mixed Use	CMX	37.50	30	Lower	YES	

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160	42609220	4528N GLENN FR	0.31	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	NO	
163	42633123	4268 N MAROA AVE	0.29	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	YES	
164	42823318	1929 E ASHLAN AVE	0.18	Corridor - Center Mixed Use	CMX	37.50	1	Above Moderate	NO	
165	43602210		0.18	Regional Mixed-Use	RMX	45.0	1	Above Moderate	YES	
166	43602228		0.31	Regional Mixed-Use	RMX	45.0	14	Above Moderate	YES	
167	43619308T		0.14	Regional Mixed-Use	RMX	45.0	6	Above Moderate	YES	
168	43627015	2111 E DAKOTA AVE	0.71	Regional Mixed-Use	RMX	45.0	32	Lower	NO	
169	43613217	2920 E JOAQUIN PL	0.30	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	YES	
170	43621107		0.23	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	YES	
171	43621322	3944 N ANGUS ST	0.22	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	YES	
172	43621314		0.18	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	YES	
173	43621316		0.16	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	YES	
174	43621317		0.17	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	YES	
175	43621319		0.23	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	YES	
176	43621320		0.15	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	YES	
178	43608072		0.40	Residential - Medium High Density	RM-1	13.6	5	Moderate	YES	
179	43722116	3436 N FIRST ST	1.38	Residential - Medium Density	RS-5	8.4	12	Above Moderate	YES	
180	43633017	4112 E SAGINAW WAY	1.91	Residential - Medium Density	RS-5	8.4	16	Above Moderate	YES	
182	44704124	4544 E SHIELDS AVE	0.14	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	YES	
287	45603034T	5471 E BELMONT AVE	4.17	Residential - Medium High Density	RM-1	13.6	57	Moderate	YES	
288	45603044		5.51	Corridor - Center Mixed Use	CMX	37.50	206	Lower	YES	
289	45603037		1.47	Corridor - Center Mixed Use	CMX	37.50	55	Lower	YES	
290	46218211 46218205		0.64	Corridor - Center Mixed Use	CMX	37.50	24	Lower	YES	
292	46202029	169 N CLOVIS AVE	2.46	Corridor - Center Mixed Use	CMX	37.50	92	Lower	YES	
293	46228034	5483 E TULARE ST	0.21	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
302	46303025	360 S CLOVIS AVE	4.41	Corridor - Center Mixed Use	CMX	37.50	165	Lower	NO	
303	31322133 31322131		0.62	Corridor - Center Mixed Use	CMX	37.50	23	Lower	YES	
304	31332107T		0.45	Residential - Medium Low Density	RS-4	4.8	2	Above Moderate	YES	
305	31379825		0.32	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
307	31324082		1.99	Corridor - Center Mixed Use	CMX	37.50	74	Lower	YES	
308	31380111 31306011		3.61	Residential - Medium Density	RS-5	8.4	30	Above Moderate	YES	
309	31381028 31306010	5913 E TULARE ST	3.12	Residential - Medium Density	RS-5	8.4	26	Above Moderate	YES	
310	31306008	5935 E TULARE ST	0.67	Residential - Medium Density	RS-5	8.4	6	Above Moderate	YES	
313	47403066		6.75	Corridor - Center Mixed Use	CMX	37.50	212	Lower	YES	

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314	47408018	1117 S CLOVIS AVE	1.69	Residential - Medium Density	RS-5	8.4	14	Above Moderate	YES	
382	31616053		2.32	Residential - Urban Neighborhood	RM-2	18.0	42	Lower	YES	
384	31602267		11.99	Residential - Medium Density	RS-5	8.4	101	Above Moderate	YES	
385	31602268		11.34	Residential - Medium Density	RS-5	8.4	95	Above Moderate	YES	
386	31602261		4.28	Residential - Urban Neighborhood	RM-2	18.0	77	Lower	NO	
388	31602201	2149 S CLOVIS AVE	6.48	Residential - Medium Low Density	RS-4	4.8	31	Above Moderate	YES	
389	31612001		1.11	Residential - Medium Low Density	RS-4	4.8	5	Above Moderate	YES	
390	48110014		1.16	Residential - Medium Low Density	RS-4	4.8	6	Above Moderate	NO	
391	48147041		4.49	Residential - Medium Density	RS-5	8.4	38	Above Moderate	YES	
392	48113026		5.96	Residential - Medium High Density	RM-1	13.6	81	Moderate	YES	
393	48113026		5.02	Residential - Medium Density	RS-5	8.4	42	Above Moderate	YES	
394	48105003	2551 S MINNEWAWA AVE	23.18	Residential - Medium High Density	RM-1	13.6	315	Moderate	YES	
396	48150109S	5231 E GARRETT AVE	0.15	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	YES	
397	48150108S	5227 E GARRETT AVE	0.15	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	YES	
398	48150107S	5223 E GARRETT AVE	0.15	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	YES	
399	48102060S	2358 S ADRIAN AVE	6.39	Residential - Medium Density	RS-5	8.4	54	Above Moderate	YES	FEMA 100-year flood zone
400	48102060S	2358 S ADRIAN AVE	5.49	Residential - Medium Low Density	RS-4	4.8	26	Above Moderate	YES	FEMA 100-year flood zone
403	48137501S	2286 S MINNEWAWA AVE	0.46	Residential Low Density	RS-2	2.0	1	Above Moderate	YES	
404	48149352S	2178 S MINNEWAWA AVE	0.47	Residential Low Density	RS-2	2.0	1	Above Moderate	YES	
405	47310307	5386 E ORLEANS AVE	0.56	Residential - Low Density	RS-3	3.3	1	Above Moderate	YES	
406	47310404	5369 E ORLEANS AVE	0.38	Residential - Low Density	RS-3	3.3	1	Above Moderate	YES	
407	47309403	5366 E TOWNSEND AVE	0.46	Residential - Low Density	RS-3	3.3	1	Above Moderate	YES	
408	47309310	5387 E TOWNSEND AVE	0.63	Residential - Low Density	RS-3	3.3	1	Above Moderate	YES	
409	47309307	5368 E BUTLER AVE	0.55	Residential - Low Density	RS-3	3.3	1	Above Moderate	NO	
410	47309315S	5348 E BUTLER AVE	0.41	Residential - Low Density	RS-3	3.3	1	Above Moderate	YES	
411	47309316S	5338 E BUTLER AVE	0.41	Residential - Low Density	RS-3	3.3	1	Above Moderate	YES	
412	47309317S	5328 E BUTLER AVE	0.41	Residential - Low Density	RS-3	3.3	1	Above Moderate	YES	
413	47213030	5433 E BUTLER AVE	0.55	Residential Low Density	RS-2	2.0	1	Above Moderate	YES	
414	47219035	5243 E LIBERTY AVE	0.60	Residential - Medium High Density	RM-1	13.6	8	Moderate	YES	
416	46310017	145 S PEACH AVE	0.65	Residential - Medium Low Density	RS-4	4.8	3	Above Moderate	YES	
417	46318104	5032 E HUNTINGTON AVE	0.14	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
418	46305046		1.47	Corridor - Center Mixed Use	CMX	37.50	55	Lower	YES	
420	47217101	933 S WILLOW AVE	0.92	Corridor - Center Mixed Use	CMX	37.50	35	Lower	YES	
	47217102	957 S WILLOW AVE								
	47216112	901 S WILLOW AVE								
421	47217208	5044 E ALTA AVE	0.45	Corridor - Center Mixed Use	CMX	37.50	17	Above Moderate	YES	
422	48102047	2122 S PEACH AVE	38.05	Residential - Medium Density	RS-5	8.4	320	Above Moderate	YES	
426	48112004	2575 S KAREN AVE	17.22	Residential - Medium Density	RS-5	8.4	145	Above Moderate	YES	

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427	48109026		3.86	Residential - Medium Density	RS-5	8.4	32	Above Moderate	YES	
428	48109024	2449 S WILLOW AVE	5.79	Residential - Medium Density	RS-5	8.4	49	Above Moderate	YES	
430	48111005	4865 E JENSEN AVE	6.27	Residential - Medium High Density	RM-1	13.6	85	Moderate	YES	FEMA 100-year flood zone
432	48108032	4958 E CHURCH AVE	4.75	Residential - Medium Density	RS-5	8.4	40	Above Moderate	YES	
433	47320037		0.21	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
434	47204025		0.64	Neighborhood Mixed-Use	NMX	32.0	21	Lower	YES	
435	46312021		0.99	Residential - Medium Density	RS-5	8.4	8	Above Moderate	NO	
436	46317121	4846 E HUNTINGTON AVE	0.22	Residential - Medium High Density	RM-1	13.6	3	Moderate	NO	
437	46312030		0.18	Residential - Medium High Density	RM-1	13.6	2	Moderate	YES	
439	48003035	2536 S MAPLE AVE	1.90	Residential - Medium Density	RS-5	8.4	16	Above Moderate	YES	
440	48003018	2534 S MAPLE AVE	0.96	Residential - Medium Density	RS-5	8.4	8	Above Moderate	YES	
441	48035314	2569 S HOLLOWAY AVE	0.51	Residential - Medium Density	RS-5	8.4	4	Above Moderate	YES	
442	48035231	2553 S ROWELL AVE	0.37	Residential - Medium Density	RS-5	8.4	3	Above Moderate	YES	
443	48032110		1.16	Residential - Medium Density	RS-5	8.4	10	Above Moderate	YES	
444	48024504		0.14	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
445	48712401	4120 E CALWA AVE	0.25	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
446	48022037	3633 E EUGENIA AVE	0.61	Residential - Medium Density	RS-5	8.4	5	Above Moderate	YES	
447	48012012		1.20	Residential - Medium Density	RS-5	8.4	10	Above Moderate	YES	
448	48008003	4737 E FLORENCE AVE	9.31	Residential - Medium Density	RS-5	8.4	78	Above Moderate	NO	
450	48020121	4643 E CHURCH AVE	0.18	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	YES	
451	47129111	2080 S CHANCE AVE	0.56	Residential - Medium Density	RS-5	8.4	5	Above Moderate	YES	
	47134001	4308 E WOODWARD AVE	2.27	Residential - Medium High Density	RM-1	13.6	31	Moderate		
452	47130243	2074 S HAYSTON AVE	0.57	Residential - Medium Density	RS-5	8.4	5	Above Moderate	YES	
453	47130245	2040 S HAYSTON AVE	0.38	Residential - Medium Density	RS-5	8.4	3	Above Moderate	YES	
455	47130206	4596 E WOODWARD AVE	0.35	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
456	47122045	4551 E WOODWARD AVE	0.80	Residential - Medium Density	RS-5	8.4	7	Above Moderate	YES	
457	47122005	4576 E HAMILTON AVE	0.96	Residential - Medium High Density	RM-1	13.6	13	Moderate	YES	
458	47017425	4796 E ALTA AVE	0.16	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
459	47009104	4736 E KINGS CANYON RD	0.14	Corridor - Center Mixed Use	CMX	37.50	5	Above Moderate	NO	
460	47008106	4648 E KINGS CANYON RD	0.37	Corridor - Center Mixed Use	CMX	37.50	14	Above Moderate	YES	
462	46129331	650 S SIERRA VISTA AVE	0.38	Corridor - Center Mixed Use	CMX	37.50	14	Above Moderate	YES	
463	46130107	618 S WHITNEY AVE	0.23	Residential - Medium Density	RS-5	8.4	2	Above Moderate	NO	
464	46130217	4723 E KINGS CANYON RD	0.23	Corridor - Center Mixed Use	CMX	37.50	9	Above Moderate	YES	
465	46130309	4755 E KINGS CANYON RD	0.31	Corridor - Center Mixed Use	CMX	37.50	12	Above Moderate	YES	
467	46130319	556 S DEARING AVE	0.21	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
468	46123413	515 S DEARING AVE	0.23	Residential - Urban Neighborhood	RM-2	18.0	4	Above Moderate	YES	
469	46123303	422 S DEARING AVE	0.42	Residential - Urban Neighborhood	RM-2	18.0	8	Above Moderate	YES	
470	46122410	533 S SIERRA VISTA AVE	0.16	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	

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471	46122136		0.19	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
472	46032339	4645 E TULARE ST	0.34	Neighborhood Mixed-Use	NMX	32.0	11	Above Moderate	YES	
473	46017227	369 N CHESTNUT AVE	0.33	Neighborhood Mixed-Use	NMX	32.0	11	Above Moderate	NO	
474	46009202	4770 E BELMONT AVE	0.32	Neighborhood Mixed-Use	NMX	32.0	10	Above Moderate	NO	
476	46009119	4705 E MADISON AVE	0.15	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
477	45432414	4675 E BELMONT AVE	0.35	Neighborhood Mixed-Use	NMX	32.0	11	Above Moderate	YES	
478	45433102	4714 E TURNER AVE	0.16	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
479	45432107	685 N BACKER AVE	0.74	Residential - Medium Density	RS-5	8.4	6	Above Moderate	NO	
481	45624122	4831 E TYLER AVE	0.66	Residential - Medium Density	RS-5	8.4	6	Above Moderate	YES	
482	45409102		0.20	Residential - Medium High Density	RM-1	13.6	3	Moderate	YES	
483	45325112		0.31	Residential - Medium High Density	RM-1	13.6	4	Moderate	YES	
504	44608213	4167 E UNION AVE	0.21	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
505	44730322	4561 E MCKINLEY AVE	0.31	Residential - Medium High Density	RM-1	13.6	4	Moderate	YES	
506	45322314	4435 E LAMONA AVE	0.23	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
507	45322316	1360 N ROWELL AVE	0.25	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
509	45423334	4537 E TURNER AVE	0.19	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
510	45431324		0.34	Residential - Medium Density	RS-5	8.4	3	Above Moderate	YES	
511	45431327	4545 E BELMONT AVE	0.37	Neighborhood Mixed-Use	NMX	32.0	12	Above Moderate	YES	
515	46007104		0.12	Neighborhood Mixed-Use	NMX	32.0	4	Above Moderate	NO	
517	45430325	4345 E BELMONT AVE	0.40	Neighborhood Mixed-Use	NMX	32.0	13	Above Moderate	YES	
518	45422324	720 N CEDAR AVE	0.59	Residential - Medium Density	RS-5	8.4	5	Above Moderate	YES	
519	46007419	4565 E GRANT AVE	0.14	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
520	46107429		0.17	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
521	46107325	4550 E TULARE ST	0.16	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
522	46107125	4510 E TULARE ST	0.11	Neighborhood Mixed-Use	NMX	32.0	4	Above Moderate	NO	
523	46030316	4313 E TULARE ST	0.29	Neighborhood Mixed-Use	NMX	32.0	9	Above Moderate	NO	
524	47007109		0.24	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
525	47007306		0.16	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
527	47106215		0.29	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
528	47106229		0.17	Residential - Medium High Density	RM-1	13.6	2	Moderate	YES	
529	47027305		0.19	Neighborhood Mixed-Use	NMX	32.0	6	Above Moderate	YES	
530	47013136		0.30	Residential - Medium Density	RS-5	8.4	3	Above Moderate	YES	
531	47013309		0.18	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
534	47005301		0.19	Neighborhood Mixed-Use	NMX	32.0	6	Above Moderate	YES	
535	47005201T	3702 E VENTURA ST	0.29	Neighborhood Mixed-Use	NMX	32.0	109	Lower	YES	
	47005202T	3754 E VENTURA ST	3.35	Neighborhood Mixed-Use	NMX	32.0				
	47005203T	3745 E EL MONTE WAY	0.26	Residential - Medium Density	RS-5	8.4				
538	47005105		0.23	Neighborhood Mixed-Use	NMX	32.0	7	Above Moderate	YES	

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539	47005115	745 S ORANGE AVE	0.21	Neighborhood Mixed-Use	NMX	32.0	7	Above Moderate	YES	
540	46126510	3849 E VENTURA ST	0.17	Neighborhood Mixed-Use	NMX	32.0	6	Above Moderate	YES	
541	46126511	3839 E VENTURA ST	0.35	Neighborhood Mixed-Use	NMX	32.0	11	Above Moderate	YES	
542	46126513	3811 E VENTURA ST	0.21	Neighborhood Mixed-Use	NMX	32.0	7	Above Moderate	YES	
543	46126410		0.17	Neighborhood Mixed-Use	NMX	32.0	6	Above Moderate	YES	
544	47126520	2060 S FIFTH ST	0.26	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
545	47126519		0.21	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
546	47126508		0.15	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
547	47125308		0.34	Residential - Medium Density	RS-5	8.4	3	Above Moderate	YES	
548	47125306		0.20	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
549	47125304		0.20	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
550	47125303		0.20	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
551	47125302	2010 S HAZELWOOD BLVD	0.40	Residential - Medium Density	RS-5	8.4	3	Above Moderate	YES	
552	47118205		0.15	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
553	47111509	3361 E HAMILTON AVE	0.11	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
554	47110306	1645 S THIRD ST	0.13	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
555	47104103	3366 E BUTLER AVE	0.17	Neighborhood Mixed-Use	NMX	32.0	6	Above Moderate	NO	
556	47104102		0.17	Neighborhood Mixed-Use	NMX	32.0	6	Above Moderate	YES	
557	47026219	3403 E BUTLER AVE	0.15	Neighborhood Mixed-Use	NMX	32.0	5	Above Moderate	YES	
558	47025403	3350 E LYELL AVE	0.17	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
559	47003206		0.68	Residential - Medium Density	RS-5	8.4	6	Above Moderate	YES	
560	47003121	3144 E VENTURA ST	0.47	Neighborhood Mixed-Use	NMX	32.0	15	Above Moderate	YES	
561	46813116	3067 E EL MONTE WAY	0.16	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
562	46813105		0.63	Neighborhood Mixed-Use	NMX	32.0	20	Lower	YES	
	46813104	3000 E VENTURA ST								
	46813103	2996 E VENTURA ST								
563	46814007	746 S HAZELWOOD BLVD	0.15	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
564	46814009	760 S HAZELWOOD BLVD	0.30	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
565	46125415		0.17	Neighborhood Mixed-Use	NMX	32.0	1	Above Moderate	NO	
566	46125407	3452 E MONO ST	0.17	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
567	46839063	2948 E TULARE ST	0.55	Neighborhood Mixed-Use	NMX	32.0	18	Lower	YES	
	46839055S									
568	46026612	3333 E TULARE ST	0.14	Neighborhood Mixed-Use	NMX	32.0	5	Above Moderate	NO	
570	46028202	3810 E ILLINOIS AVE	0.14	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
571	46029609	4155 E TULARE ST	0.52	Neighborhood Mixed-Use	NMX	32.0	17	Lower	YES	
572	46029720		0.15	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
	46029710									
573	46005248	4175 E MADISON AVE	0.14	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	

Site ID	APN	Address	Size (acres)	General Plan Land Use Designation	Zoning	Assumed Density (per acre)	Units	Income Level	In 5th Cycle Housing Element?	Environmental Constraint
574	46004217	3870 E BELMONT AVE	0.39	Neighborhood Mixed-Use	NMX	32.0	12	Above Moderate	YES	
575	45428161	3883 E WHITE AVE	0.21	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
576	45928407	3042 E NEVADA AVE	0.13	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
577	45919406	3040 E WASHINGTON AVE	0.14	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
578	45919225	3079 E WASHINGTON AVE	0.27	Residential - Medium Density	RS-5	8.4	2	Above Moderate	NO	
579	45919201	3004 E GRANT AVE	0.13	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
580	45919126	2951 E WASHINGTON AVE	0.17	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
581	45910405	3028 E MADISON AVE	0.11	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
582	45910433	409 N FIRST ST	0.19	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
583	45910226	3081 E MADISON AVE	0.21	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
584	46010103	3150 E GRANT AVE	0.18	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
585	45233516	3065 E BELMONT AVE	0.15	Neighborhood Mixed-Use	NMX	32.0	5	Above Moderate	NO	
586	45426135	538 N FIRST ST	0.23	Residential - Medium Density	RS-5	8.4	2	Above Moderate	NO	
587	45426143		0.17	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
588	45418510		0.22	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
589	45418125	702 N FIRST ST	0.09	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
590	45418124	714 N FIRST ST	0.11	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
591	45418122		0.11	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
592	45418130	739 N SECOND ST	0.13	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
593	45418226	3228 E HARVEY AVE	0.08	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
594	45418221	3232 E HARVEY AVE	0.07	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
595	45418313	736 N FISHER ST	0.12	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
596	45418421	738 N THIRD ST	0.17	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
597	45418408		0.17	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
598	45418413	720 N THIRD ST	0.17	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
599	45426321	618 N FISHER ST	0.30	Residential - Medium Density	RS-5	8.4	3	Above Moderate	NO	
600	45426215	3201 E BELMONT AVE	0.14	Neighborhood Mixed-Use	NMX	32.0	5	Above Moderate	YES	
602	45427122	616 N BOND ST	0.16	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
603	45419405	717 N MILLBROOK AVE	0.18	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
604	45420417	3859 E TURNER AVE	0.16	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
605	45405428	1035 N CEDAR AVE	0.50	Residential - Medium Density	RS-5	8.4	4	Above Moderate	YES	
606	45405218	1102 N ELEVENTH ST	0.09	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
607	45405233		0.11	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
608	45329238	1249 N CEDAR AVE	0.16	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
609	45404228		0.47	Residential - Medium Density	RS-5	8.4	4	Above Moderate	YES	
610	45328223		0.64	Residential - Medium Density	RS-5	8.4	5	Above Moderate	YES	
611	45320101	3746 E FLORADORA AVE	0.44	Residential - Medium Density	RS-5	8.4	4	Above Moderate	YES	
612	45312122		0.30	Residential - Medium Density	RS-5	8.4	3	Above Moderate	YES	

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613	45305120		0.90	Residential - Medium Density	RS-5	8.4	8	Above Moderate	YES	
614	45124226	1361 N FIRST ST	0.19	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
615	45310222	3255 E PINE AVE	0.15	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
616	44519211	2707 N FRESNO ST	0.37	Residential - Medium Density	RS-5	8.4	3	Above Moderate	YES	
617	44505112	2819 E SIMPSON AVE	0.22	Residential - Medium Density	RS-5	8.4	2	Above Moderate	NO	
618	43516225	1142 E GARLAND AVE	0.16	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
619	43517302	1314 E FEDORA AVE	0.21	Residential - Medium High Density	RM-1	13.6	3	Moderate	YES	
620	43517308	1422 E FEDORA AVE	0.69	Residential - Medium High Density	RM-1	13.6	9	Moderate	YES	FEMA 100-year flood zone
621	43524210		0.15	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
622	43533301		0.15	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
623	44310204	1526 E SHIELDS AVE	0.50	Neighborhood Mixed-Use	NMX	32.0	16	Lower	YES	
	44310203	1518 E SHIELDS AVE								
	44310202	1510 E SHIELDS AVE								
	44310201	1502 E SHIELDS AVE								
624	44310217	1519 E SIMPSON AVE	0.15	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
625	44309223	1103 E SIMPSON AVE	0.15	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
629	44318222	2915 N BLACKSTONE AVE	0.25	Neighborhood Mixed-Use	NMX	32.0	8	Above Moderate	YES	
631	44333623		0.35	Residential - Medium High Density	RM-1	13.6	5	Moderate	YES	
632	44409110	1433 E VASSAR AVE	0.14	Residential - Medium High Density	RM-1	13.6	2	Moderate	YES	
633	44409205	1605 E VASSAR AVE	2.73	Neighborhood Mixed-Use	NMX	32.0	87	Lower	YES	
	44409204	1538 E CLINTON AVE								
	44409228	1533 E VASSAR AVE								
634	44409220		0.21	Neighborhood Mixed-Use	NMX	32.0	7	Above Moderate	NO	
635	44409301	2240 N SAN PABLO AVE	0.16	Residential - Medium High Density	RM-1	13.6	2	Moderate	YES	
636	44409310	1405 E YALE AVE	0.13	Residential - Medium High Density	RM-1	13.6	2	Moderate	YES	
637	44408607	2221 N SAN PABLO AVE	0.15	Residential - Medium High Density	RM-1	13.6	2	Moderate	YES	
638	44408514	1143 E YALE AVE	0.16	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
639	44624203		0.17	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
640	45123103	2556 E FLORADORA AVE	0.16	Residential - Medium High Density	RM-1	13.6	2	Moderate	YES	
641	45208112	2525 E CLAY AVE	0.18	Residential - Medium High Density	RM-1	13.6	2	Moderate	YES	
642	45216513		0.15	Residential - Medium High Density	RM-1	13.6	2	Moderate	YES	
643	45223221		1.14	Residential - Medium High Density	RM-1	13.6	15	Moderate	YES	
644	45222616	2012 E HARVEY AVE	0.43	Residential - Medium High Density	RM-1	13.6	6	Moderate	YES	
645	45215522	2215 E LEWIS AVE	0.15	Residential - Medium High Density	RM-1	13.6	2	Moderate	YES	
646	45215512		0.15	Residential - Medium High Density	RM-1	13.6	2	Moderate	YES	
647	45206602	2012 E CLAY AVE	0.15	Residential - Medium High Density	RM-1	13.6	2	Moderate	YES	
648	45207304	2224 E WEBSTER AVE	0.15	Residential - Medium High Density	RM-1	13.6	2	Moderate	NO	
649	45222406		0.16	Neighborhood Mixed-Use	NMX	32.0	5	Above Moderate	YES	

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651	45214608	1918 E LEWIS AVE	0.15	Neighborhood Mixed-Use	NMX	32.0	5	Above Moderate	YES	
652	45214601	848 N ABBY ST	0.20	Neighborhood Mixed-Use	NMX	32.0	6	Above Moderate	YES	
654	45214302	1925 E LEWIS AVE	0.24	Neighborhood Mixed-Use	NMX	32.0	8	Above Moderate	YES	
655	45206207	1906 E OLIVE AVE	0.13	Neighborhood Mixed-Use	NMX	32.0	4	Above Moderate	YES	
656	45129633	1150 N ABBY ST	0.27	Neighborhood Mixed-Use	NMX	32.0	9	Above Moderate	YES	
660	45205308	1556 E OLIVE AVE	0.17	Commercial - Main Street	CMS	24.00	4	Above Moderate	NO	
661	45205111	1047 N DELPHIA AVE	0.14	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
662	45221112	837 N GLENN AVE	0.17	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
663	45229134	604 N SAN PABLO AVE	0.60	Residential - Medium Density	RS-5	8.4	5	Above Moderate	YES	
664	45905119S		0.29	Commercial - Main Street	CMS	24.00	7	Above Moderate	YES	
665	45228216		0.19	Commercial - Main Street	CMS	24.00	4	Above Moderate	YES	
666	45228221		0.18	Commercial - Main Street	CMS	24.00	4	Above Moderate	YES	
667	45220707	712 N VAN NESS AVE	0.18	Commercial - Main Street	CMS	24.00	4	Above Moderate	YES	
668	45227304	510 N YOSEMITE AVE	0.27	Commercial - Main Street	CMS	24.00	6	Above Moderate	NO	FEMA 100-year flood zone
669	45219411	821 E THOMAS AVE	0.10	Commercial - Main Street	CMS	24.00	2	Above Moderate	NO	FEMA 100-year flood zone
670	45211212		0.14	Commercial - Main Street	CMS	24.00	3	Above Moderate	YES	
674	45127111	1201 N VAN NESS AVE	0.21	Commercial - Main Street	CMS	24.00	5	Above Moderate	NO	
678	45112220	1458 N VAN NESS AVE	0.14	Commercial - Main Street	CMS	24.00	3	Above Moderate	NO	
679	44405201		0.73	Residential - Medium Density	RS-5	8.4	6	Above Moderate	YES	
680	44405202		0.17	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
681	45103107	1541 N FERGER AVE	0.15	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
682	45125111	315 E OLIVE AVE	0.47	Commercial - Main Street	CMS	24.00	11	Above Moderate	YES	
683	45219113	712 N ECHO AVE	0.34	Residential - Medium Density	RS-5	8.4	3	Above Moderate	YES	
684	45226411	563 E BELMONT AVE	0.40	Commercial - Main Street	CMS	24.00	10	Above Moderate	YES	
685	45904101	706 E BELMONT AVE	0.47	Commercial - Main Street	CMS	24.00	11	Above Moderate	YES	
687	45912217	303 N BROADWAY	0.14	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
688	45912118	341 N ECHO AVE	0.43	Residential - Medium Density	RS-5	8.4	4	Above Moderate	YES	FEMA 100-year flood zone
689	45911211	255 N FERGER AVE	0.17	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
690	45226206	605 N WILSON AVE	0.18	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
691	45027403	631 N PALM AVE	0.24	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
704	45020319	111 E ALHAMBRA AVE	0.16	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
706	45020104	24 E OLIVE AVE	0.15	Commercial - Main Street	CMS	24.00	4	Above Moderate	NO	
707	45022201	994 N ADOLINE AVE	0.14	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
708	45021106T	929 N FRUIT AVE	0.21	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
714	45015401T	761 W HAMMOND AVE	0.16	Residential - Medium High Density	RM-1	13.6	2	Moderate	YES	
715	44411307	745 W CAMBRIDGE AVE	0.45	Residential - Medium Density	RS-5	8.4	4	Above Moderate	YES	
716	43526422	1022 W SHIELDS AVE	0.16	Residential - Medium High Density	RM-1	13.6	2	Moderate	YES	
717	44201002U		1.73	Residential - Medium High Density	RM-1	13.6	23	Moderate	YES	

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718	43308001	3282 N MARKS AVE	0.84	Residential - Medium Density	RS-5	8.4	7	Above Moderate	YES	
719	43321033	3312 N MARKS AVE	1.21	Residential - Medium Density	RS-5	8.4	10	Above Moderate	YES	
720	43321014	2510 W GARLAND AVE	0.37	Residential - Medium Density	RS-5	8.4	3	Above Moderate	YES	
721	43321008	2535 W DAKOTA AVE	0.25	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
722	43322006	2317 W DAKOTA AVE	1.00	Residential - Medium Density	RS-5	8.4	8	Above Moderate	YES	
724	43323006	1785 W DAKOTA AVE	0.58	Residential - Medium High Density	RM-1	13.6	8	Moderate	YES	
725	43402081	1101 W ASHLAN AVE	6.00	Residential - Medium High Density	RM-1	13.6	82	Moderate	YES	
726	43402057	505 W ASHLAN AVE	0.70	Residential - Medium High Density	RM-1	13.6	10	Moderate	YES	
727	42628102	727 W SWIFT AVE	0.38	Residential - Medium Low Density	RS-4	4.8	2	Above Moderate	YES	
728	42504136	4942 N FRUIT AVE	0.34	Residential - Medium High Density	RM-1	13.6	5	Moderate	YES	
729	42406201	2171 W SHAW AVE	0.52	Corridor - Center Mixed Use	CMX	37.50	19	Lower	YES	
730	42450126	4505 N EMERSON AVE	3.66	Residential - Medium High Density	RM-1	13.6	50	Moderate	YES	
731	41533131		0.35	Residential - Medium Low Density	RS-4	4.8	2	Above Moderate	YES	
732	42464010	3441 W SHAW AVE	0.25	Regional Mixed-Use	RMX	45.0	11	Above Moderate	YES	
733	42466004	3471 W SHAW AVE	0.22	Regional Mixed-Use	RMX	45.0	10	Above Moderate	YES	
734	42466007	3421 W SHAW AVE	0.24	Regional Mixed-Use	RMX	45.0	11	Above Moderate	YES	
735	42466005	3425 W SHAW AVE	0.22	Regional Mixed-Use	RMX	45.0	10	Above Moderate	YES	
736	42466002	3477 W SHAW AVE	0.24	Regional Mixed-Use	RMX	45.0	11	Above Moderate	YES	
740	41504440		0.85	Regional Mixed-Use	RMX	45.0	38	Lower	YES	
742	41502817U		6.98	Residential - Medium High Density	RM-1	13.6	95	Moderate	YES	
743	41568539	5616 N BRAWLEY AVE	0.47	Residential - Medium High Density	RM-1	13.6	6	Moderate	YES	
744	41568527		0.34	Residential - Medium High Density	RM-1	13.6	5	Moderate	YES	
745	40613314S	6049 N SAN PEDRO AVE	0.13	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	YES	
747	40642126S	6712 N SELLAND AVE	0.28	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	YES	
748	50113410S	3608 W FIR AVE	0.33	Residential - Medium Low Density	RS-4	4.8	2	Above Moderate	YES	
749	50727722	6430 N PIMA AVE	0.27	Residential - Low Density	RS-3	3.3	1	Above Moderate	YES	
750	50727719	6435 N PIMA AVE	0.27	Residential - Low Density	RS-3	3.3	1	Above Moderate	YES	
751	50727718	6413 N PIMA AVE	0.28	Residential - Low Density	RS-3	3.3	1	Above Moderate	YES	
752	50922001S	5463 N GATES AVE	0.21	Residential - Medium High Density	RM-1	13.6	3	Moderate	YES	
754	50812013S	5123 W MISSION AVE	0.13	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
755	50812010S	5179 W MISSION AVE	0.42	Residential - Medium Density	RS-5	8.4	4	Above Moderate	YES	
756	50812006S	5227 W MISSION AVE	0.40	Residential - Medium Density	RS-5	8.4	3	Above Moderate	YES	
757	50808233S	5130 N BARCUS AVE	0.22	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
759	50808209S	5226 N MARKET ST	0.85	Residential - Medium Density	RS-5	8.4	7	Above Moderate	YES	
760	50807011S	5160 N POLK AVE	0.14	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
761	50810121S	5293 N MARKET ST	0.43	Residential - Medium Density	RS-5	8.4	4	Above Moderate	YES	
767	50613004S	6507 N POLK AVE	3.91	Residential - Urban Neighborhood	RM-2	18.0	70	Lower	NO	

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768	50613039	Near W Sierra Ave & N Vista Ave	10.48	Residential - Urban Neighborhood	RM-2	18.0	0	Moderate	YES	
	50613039						0	Above Moderate		
	50613039						189	Lower		
769	50613039		5.05	Residential - Urban Neighborhood	RM-2	18.0	91	Lower	NO	
775	50234301S	7710 N DANTE AVE	0.38	Residential - Low Density	RS-3	3.3	1	Above Moderate	YES	
776	50206210	4996 W PINEDALE AVE	0.22	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	YES	
777	50302011		11.20	Residential - Medium High Density	RM-1	13.6	152	Moderate	YES	
780	50409209	N Hayes Ave near W Herndon Ave	13.10	Residential - Urban Neighborhood	RM-2	18.0	0	Moderate	YES	
							0	Above Moderate		
							236	Lower		
781	50409220		5.30	Residential - Urban Neighborhood	RM-2	18.0	95	Lower	YES	
785	50409253S		5.43	Commercial - Regional	CR	40.00	217	Lower	YES	
786	50412301S		0.17	Residential - Medium High Density	RM-1	13.6	2	Moderate	YES	
787	50412309S	7110 N EVEREST AVE	0.17	Residential - Medium High Density	RM-1	13.6	2	Moderate	YES	
788	50412110S	7010 N VAN BUREN AVE	0.17	Residential - Medium High Density	RM-1	13.6	2	Moderate	YES	
789	50412106S	7050 N VAN BUREN AVE	0.17	Residential - Medium High Density	RM-1	13.6	2	Moderate	YES	
800	50411201	7075 N VAN BUREN AVE	0.17	Residential - Medium High Density	RM-1	13.6	2	Moderate	YES	
801	50410113	6980 N WEBER AVE	0.17	Residential - Medium High Density	RM-1	13.6	2	Moderate	YES	
802	50410111	6968 N WEBER AVE	0.26	Residential - Medium High Density	RM-1	13.6	4	Moderate	YES	
803	50410404	6975 N WEBER AVE	0.17	Residential - Medium High Density	RM-1	13.6	2	Moderate	YES	
804	50410410	6983 N WEBER AVE	0.13	Residential - Medium High Density	RM-1	13.6	2	Moderate	NO	
805	50410416		0.21	Residential - Medium High Density	RM-1	13.6	3	Moderate	NO	
806	50408152S		4.73	Residential - Medium High Density	RM-1	13.6	64	Moderate	NO	
807	50525003	7250 W MORRIS AVE	0.36	Residential - Low Density	RS-3	3.3	1	Above Moderate	YES	
809	50522058		0.71	Residential - Medium Low Density	RS-4	4.8	3	Above Moderate	YES	
810	50522059		0.64	Residential - Medium Low Density	RS-4	4.8	3	Above Moderate	YES	
811	50507042S		1.15	Residential - Medium Density	RS-5	8.4	10	Above Moderate	YES	
812	50507005S		1.14	Residential - Medium Density	RS-5	8.4	10	Above Moderate	YES	
813	50530320S	7420 W SAN RAMON AVE	0.22	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	YES	
814	50530319S	7436 W SAN RAMON AVE	0.25	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	YES	
815	50530318S	7452 W SAN RAMON AVE	0.32	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	YES	
816	50506008	6785 W BARSTOW FR	13.26	Residential - Medium High Density	RM-1	13.6	90	Moderate	YES	
817	50506008	6785 W BARSTOW FR	16.98	Corridor - Center Mixed Use	CMX	37.50	115	Moderate	YES	
							38	Above Moderate		
							38	Lower		
818	50506008	6785 W BARSTOW FR	7.80	Corridor - Center Mixed Use	CMX	37.50	53	Moderate	YES	
							18	Above Moderate		
							18	Lower		

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819	50506074 50506066	W Scott Ave near W Barstow Ave	24.05	Residential - Urban Neighborhood	RM-2	18.0	130 43 43	Moderate Above Moderate Lower	YES	
820	50506070	End of N Ensanada Ave	0.45	Residential - Urban Neighborhood	RM-2	18.0	2 1 1	Moderate Above Moderate Lower	YES	
826	50506024	6130 W SHAW AVE	3.30	Corridor - Center Mixed Use	CMX	37.50	0 0 37	Moderate Above Moderate Lower	YES	
827	50506068	6010 W SHAW AVE	5.15	Corridor - Center Mixed Use	CMX	37.50	0 0 58	Moderate Above Moderate Lower	YES	
828	50506067	End of W Keats Ave	9.20	Corridor - Center Mixed Use	CMX	37.50	0 0 103	Moderate Above Moderate Lower	YES	
830	50803025	N Island Waterpark Dr at canal	13.27	Regional Mixed-Use	RMX	45.0	107 36 36	Moderate Above Moderate Lower	YES	
831	50803004	5708 W SHAW AVE	5.56	Regional Mixed-Use	RMX	45.0	0 0 75	Moderate Above Moderate Lower	YES	
832	51024012	5373 W FAIRMONT AVE	0.21	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
833	51024011	5383 W FAIRMONT AVE	0.21	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
834	51013033S		0.12	Residential - Urban Neighborhood	RM-2	18.0	2	Above Moderate	NO	
835	51051322	5431 W ACACIA AVE	0.13	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
836	51051320	5447 W ACACIA AVE	0.13	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
837	51051318	5463 W ACACIA AVE	0.13	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
838	51011034 51011029 51011030 51011031 51004011	5703 W SHAW AVE 5705 W SHAW AVE 5707 W SHAW AVE 5711 W SHAW AVE	1.51	Residential - Urban Neighborhood		18.0	27	Lower	YES	
839	51011037	5753 W SHAW AVE	0.14	Residential - Urban Neighborhood	RM-2	18.0	3	Above Moderate	YES	
840	51011025	5751 W SHAW AVE	0.23	Residential - Urban Neighborhood	RM-2	18.0	4	Above Moderate	YES	
841	51011024	5747 W SHAW AVE	0.27	Residential - Urban Neighborhood	RM-2	18.0	5	Above Moderate	YES	
842	51004013	5729 W SHAW AVE	0.50	Residential - Urban Neighborhood	RM-2	18.0	9	Lower	YES	
843	51004007	5727 W SHAW AVE	0.25	Residential - Urban Neighborhood	RM-2	18.0	5	Above Moderate	YES	
844	51004009	5715 W SHAW AVE	0.37	Residential - Urban Neighborhood	RM-2	18.0	7	Above Moderate	YES	

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845	51004008	5717 W SHAW AVE	0.49	Residential - Urban Neighborhood	RM-2	18.0	9	Above Moderate	YES	
846	51011015	5811 W SHAW AVE	0.08	Residential - Urban Neighborhood	RM-2	18.0	1	Above Moderate	NO	
847	51011009	5863 W SHAW AVE	0.13	Residential - Urban Neighborhood	RM-2	18.0	2	Above Moderate	YES	
848	51011008	5869 W SHAW AVE	1.27	Residential - Urban Neighborhood	RM-2	18.0	23	Lower	YES	
849	51011006	5871 W SHAW AVE	3.37	Residential - Urban Neighborhood	RM-2	18.0	52	Lower	YES	
	51011032	5861 W SHAW AVE								
	51011033									
	51011035	5875 W SHAW AVE								
	51011005	5873 W SHAW AVE								
850	51004038		1.62	Residential - Urban Neighborhood	RM-2	18.0	29	Lower	NO	
851	510540X1		4.99	Residential - Urban Neighborhood	RM-2	18.0	90	Lower	NO	
	51054009									
	51054013									
	51054013									
	51054012									
	51054008									
	51054018									
	510540X2									
	51054016									
	51054010									
	51054002									
	51054007									
	51054003									
	51054011									
	51054015									
	51054001									
855	51203103		1.67	Regional Mixed-Use	RMX	45.0	75	Lower	YES	
856	51203102		1.67	Regional Mixed-Use	RMX	45.0	75	Lower	YES	
857	51209402	4715 N BRYAN AVE	0.39	Residential - Medium Density	RS-5	8.4	3	Above Moderate	YES	
858	51002201S		4.76	Residential - Urban Neighborhood	RM-2	18.0	86	Lower	YES	
859	51002244		0.88	Residential - Medium Density	RS-5	8.4	7	Above Moderate	YES	
987	51135201ST		0.26	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	YES	
988	51102301	5677 W DAKOTA AVE	14.57	Residential - Urban Neighborhood	RM-2	18.0	0	Moderate	YES	
							0	Above Moderate		
							262	Lower		
989	51101107	5555 W ASHLAN AVE	9.77	Residential - Medium Density	RS-5	8.4	82	Above Moderate	YES	
990	51107410	3916 N CONSTANCE AVE	2.12	Residential - Medium Low Density	RS-4	4.8	10	Above Moderate	YES	
991	51121412	4794 W FLINT WAY	12.33	Residential - Medium Low Density	RS-4	4.8	59	Above Moderate	YES	

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992	51117120		4.94	Residential - Medium Density	RS-5	8.4	42	Above Moderate	YES	
993	51125002	3572 N BLYTHE AVE	4.85	Residential - Medium High Density	RM-1	13.6	66	Moderate	YES	
994	51136324	3540 N BLYTHE AVE	2.34	Residential - Medium High Density	RM-1	13.6	32	Moderate	YES	
995	51124033	3953 N PARKWAY DR	9.47	Residential - Medium High Density	RM-1	13.6	129	Moderate	YES	
996	51124036		1.94	Residential - Medium High Density	RM-1	13.6	26	Moderate	YES	
997	43305006	3714 W DAKOTA FR	1.07	Residential - Medium Density	RS-5	8.4	9	Above Moderate	YES	
998	51103142S		15.38	Residential - Medium Density	RS-5	8.4	129	Above Moderate	YES	
999	51103160S		0.20	Residential - Medium Density	RS-5	8.4	2	Above Moderate	NO	
1000	43309024S		3.06	Residential - Medium High Density	RM-1	13.6	42	Moderate	YES	
1001	43303207		7.26	Residential - Medium High Density	RM-1	13.6	99	Moderate	YES	
1002	43309021S	3484 W SHIELDS AVE	2.21	Residential - Medium Density	RS-5	8.4	19	Above Moderate	YES	
1003	44203007	3409 W SHIELDS AVE	2.19	Residential - Medium High Density	RM-1	13.6	30	Moderate	YES	
1004	44204018	3375 W SHIELDS AVE	2.20	Residential - Medium Density	RS-5	8.4	18	Above Moderate	YES	
1005	44204002		9.70	Residential - Medium Density	RS-5	8.4	81	Above Moderate	YES	
1006	31230032	4176 W CORNELL AVE	0.20	Residential - Low Density	RS-3	3.3	1	Above Moderate	YES	
1007	31253503		0.35	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1008	31254127	4377 W HARVARD AVE	0.41	Residential - Medium Density	RS-5	8.4	3	Above Moderate	YES	
1009	44206033	3508 W CLINTON AVE	4.64	Residential - Medium High Density	RM-2	18.0	83	Lower	NO	
1010	31208226		1.24	Residential - Medium Density	RS-5	8.4	10	Above Moderate	YES	
1011	31208224		13.68	Residential - Medium Density	RS-5	8.4	108	Above Moderate	YES	
1012	31260424	4657 W UNIVERSITY AVE	0.12	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1013	31260423	4665 W UNIVERSITY AVE	0.11	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1014	31208136	2348 N CORNELIA AVE	2.03	Residential Low Density	RE	0.1	1	Above Moderate	YES	
1015	31265010S	5545 W HAMMOND AVE	0.18	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	YES	
1027	44202232		3.89	Residential - Medium Density	RS-5	8.4	33	Above Moderate	YES	
1028	44207132		2.07	Residential - Medium Low Density	RS-4	4.8	10	Above Moderate	YES	
1029	44209051	2827 W CLINTON AVE	4.38	Residential - Medium Density	RS-5	8.4	37	Above Moderate	NO	
1030	44209050	2755 W CLINTON AVE	0.61	Residential - Medium Density	RS-5	8.4	5	Above Moderate	YES	
1031	44209047		0.51	Neighborhood Mixed-Use	NMX	32.0	16	Lower	YES	
1034	44211120		1.75	Neighborhood Mixed-Use	NMX	32.0	56	Lower	YES	
1035	44902010		8.88	Residential - Low Density	RS-3	3.3	30	Above Moderate	YES	
1036	44909033S		9.03	Residential Medium High Density	RM-MH	8.5	77	Moderate	YES	
1037	44919209	2214 W HEDGES AVE	0.47	Residential - Low Density	RS-3	3.3	2	Above Moderate	NO	
1038	44923128	1811 W HEDGES AVE	1.17	Neighborhood Mixed-Use	NMX	32.0	37	Lower	YES	
1039	44923127	1824 W OLIVE AVE	1.26	Neighborhood Mixed-Use	NMX	32.0	40	Lower	YES	
1041	44926001	2035 W OLIVE AVE	4.27	Neighborhood Mixed-Use	NMX	32.0	137	Lower	YES	
1043	44931218		0.23	Residential - Low Density	RS-3	3.3	1	Above Moderate	YES	
1044	44926037	1028 N CRYSTAL AVE	0.33	Residential - Low Density	RS-3	3.3	1	Above Moderate	YES	

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1045	44931228	937 N CRYSTAL AVE	0.44	Residential - Low Density	RS-3	3.3	1	Above Moderate	YES	
1046	44932118		0.85	Neighborhood Mixed-Use	NMX	32.0	27	Lower	YES	
1055	44934104		0.25	Residential - Low Density	RS-3	3.3	1	Above Moderate	YES	
1056	44934110	549 N PARKVIEW DR	0.24	Residential - Low Density	RS-3	3.3	1	Above Moderate	YES	
1058	44934206	624 N PARKVIEW DR	0.24	Residential - Low Density	RS-3	3.3	1	Above Moderate	NO	
1059	44934202		0.27	Residential - Low Density	RS-3	3.3	1	Above Moderate	YES	
1060	44934203		0.30	Residential - Low Density	RS-3	3.3	1	Above Moderate	YES	
1061	45814108		0.67	Residential - Medium Density	RS-5	8.4	6	Above Moderate	YES	
1062	45811207	1001 W BELMONT AVE	0.09	Neighborhood Mixed-Use	NMX	32.0	3	Above Moderate	NO	
1063	45811205	461 N DURANT WAY	0.13	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1065	45811402	450 N TEILMAN AVE	3.51	Neighborhood Mixed-Use	NMX	32.0	112	Lower	YES	
1066	45812119	719 W BELMONT AVE	0.44	Neighborhood Mixed-Use	NMX	32.0	14	Above Moderate	NO	
1067	45812106	443 N DELNO AVE	0.16	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1068	45814415	823 W NAPA AVE	0.28	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
1069	45813117	327 BELMONT AVE	4.05	Residential - Medium Density	RS-5	8.4	34	Above Moderate	NO	
1070	45813204	459 N WESLEY AVE	0.16	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1071	45816103		0.16	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1072	45816114		0.24	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
1073	45816106	343 W FRANKLIN AVE	0.21	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
1074	45816107		0.16	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1075	45816112	355 N ARTHUR AVE	0.19	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
1085	46402024	2106 W KEARNEY BLVD	2.00	Residential - Medium Low Density	RS-4	4.8	10	Above Moderate	YES	
1086	45808059	2540 W WHITES BRIDGE AVE	3.30	Commercial - Regional	CR	40.00	112	Lower	NO	
1087	45808055	2510 W WHITES BRIDGE AVE	3.32	Commercial - Regional	CR	40.00	113	Lower	NO	
1088	45808027	2280 W WHITES BRIDGE AVE	8.11	Commercial - Regional	CR	40.00	324	Lower	NO	
1089	45808060	2137 W EL DORADO ST	1.44	Commercial - Regional	CR	40.00	58	Lower	NO	
1090	45808033	618 S HUGHES AVE	1.91	Commercial - Regional	CR	40.00	76	Lower	NO	
1091	46404007	733 S HUGHES AVE	8.91	Residential - Medium Density	RS-5	8.4	75	Above Moderate	YES	
1092	46404054	770 S SEQUOIA DR	2.58	Residential - Medium Density	RS-5	8.4	22	Above Moderate	YES	
1093	46404039	1849 W WHITES BRIDGE AVE	0.74	Residential - Medium Density	RS-5	8.4	6	Above Moderate	YES	
1095	46404042		1.85	Residential - Medium Low Density	RS-4	4.8	9	Above Moderate	YES	
1096	46404059T		0.98	Residential - Medium Low Density	RS-4	4.8	5	Above Moderate	YES	
1097	46404073T		2.32	Residential - Medium Low Density	RS-4	4.8	11	Above Moderate	YES	
1098	46431210T	1108 S ROEDING DR	0.18	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	YES	
1099	46431211T	1122 S ROEDING DR	0.23	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	YES	
1100	46431212T	1136 S ROEDING DR	0.24	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	YES	
1101	46431213T	1150 S WEST AVE	0.46	Residential - Medium Low Density	RS-4	4.8	2	Above Moderate	YES	
1102	46431214T	1164 S WEST AVE	0.39	Residential - Medium Low Density	RS-4	4.8	2	Above Moderate	YES	

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1103	46427237T	1212 S WEST AVE	1.05	Residential - Medium Low Density	RS-4	4.8	5	Above Moderate	YES	
1104	46427238		0.80	Residential - Medium Low Density	RS-4	4.8	4	Above Moderate	YES	
1105	46427238		1.10	Residential - Low Density	RS-3	3.3	4	Above Moderate	YES	
1113	46407009	1705 W KEARNEY BLVD	2.76	Residential - Low Density	RS-2	2.0	6	Above Moderate	NO	
1114	46407009	1705 W KEARNEY BLVD	5.29	Residential - Medium Density	RS-5	8.4	44	Above Moderate	NO	
1115	46407005	1604 S CRYSTAL AVE	4.53	Residential - Medium Density	RS-5	8.4	38	Above Moderate	NO	
1116	46426042		0.24	Residential - Low Density	RS-3	3.3	1	Above Moderate	YES	
1117	46426040		0.23	Residential - Low Density	RS-3	3.3	1	Above Moderate	YES	
1120	46430029		0.73	Residential - Medium Low Density	RS-4	4.8	4	Above Moderate	YES	
1121	46430020		0.13	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	YES	
1122	46430022		0.39	Residential - Medium Low Density	RS-4	4.8	2	Above Moderate	YES	
1123	46410215		1.25	Corridor - Center Mixed Use	CMX	37.50	47	Lower	YES	
1124	46410208T	2022 S WEST AVE	0.44	Corridor - Center Mixed Use	CMX	37.50	10	Above Moderate	YES	
1125	46419207		0.18	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
1126	46417210	714 W VALENCIA AVE	0.15	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1127	46420011		0.15	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1129	47704075ST	901 W ATCHISON CT	1.19	Residential - Urban Neighborhood	RM-2	18.0	21	Lower	YES	
1130	47704075ST	901 W ATCHISON CT	4.91	Residential - Urban Neighborhood	RM-2	18.0	88	Lower	YES	
1131	47704073T	555 W CALIFORNIA AVE	8.06	Corridor - Center Mixed Use	CMX	37.50	302	Lower	YES	
1132	47704052		0.36	Corridor - Center Mixed Use	CMX	37.50	14	Above Moderate	YES	
1134	47704049		1.80	Corridor - Center Mixed Use	CMX	37.50	68	Lower	YES	
1135	47711109ST	2141 S FRUIT AVE	3.59	Corridor - Center Mixed Use	CMX	37.50	154	Lower	YES	Brownfield
	47711110T		0.52							
1136	47711303	333 W CHURCH RD	0.85	Corridor - Center Mixed Use	CMX	37.50	32	Lower	YES	
1137	47711302	403 W CHURCH RD	0.40	Corridor - Center Mixed Use	CMX	37.50	15	Above Moderate	YES	
1138	47711301	433 W CHURCH RD	0.79	Corridor - Center Mixed Use	CMX	37.50	30	Lower	YES	
1139	47713101	2233 S FRUIT AVE	0.65	Corridor - Center Mixed Use	CMX	37.50	24	Lower	YES	
1140	47713102		0.83	Corridor - Center Mixed Use	CMX	37.50	31	Lower	YES	
1141	47713112		0.18	Corridor - Center Mixed Use	CMX	37.50	7	Above Moderate	YES	
1142	47713104	403 W LORENA AVE	0.19	Corridor - Center Mixed Use	CMX	37.50	7	Above Moderate	YES	
1143	47713105	335 W LORENA AVE	0.19	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
1144	47711207	130 W ATCHISON ST	0.62	Residential - Medium Density	RS-5	8.4	5	Above Moderate	YES	
1145	47711405	215 W ATCHISON ST	0.19	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
1146	47711411	2152 S THORNE AVE	0.17	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1147	47713418	106 W FLORENCE AVE	0.19	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
1148	47713419	102 W FLORENCE AVE	0.19	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
1149	47712101		0.28	Neighborhood Mixed-Use	NMX	32.0	9	Above Moderate	YES	
1150	47712102		0.36	Neighborhood Mixed-Use	NMX	32.0	11	Above Moderate	YES	

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1151	47712113T	33 E ATCHISON ST	0.21	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
1152	47712104	64 E CALIFORNIA AVE	0.18	Neighborhood Mixed-Use	NMX	32.0	6	Above Moderate	YES	
1153	47712105T		0.18	Neighborhood Mixed-Use	NMX	32.0	12	Above Moderate	YES	
	47712106T		0.19							
1155	47712306	64 E ATCHISON ST	0.19	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
1156	47712313	45 E LORENA AVE	0.19	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
1157	47714102		0.19	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
1158	47714116		0.19	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
1163	47714534	50 E GEARY ST	0.42	Residential - Medium Density	RS-5	8.4	4	Above Moderate	YES	
1167	47712436	122 E CALIFORNIA AVE	0.65	Neighborhood Mixed-Use	NMX	32.0	21	Lower	YES	
1168	47716116	46 E FLORENCE AVE	3.40	Residential - Low Density	RS-3	3.3	11	Above Moderate	NO	
1169	47716111		0.36	Residential - Low Density	RS-3	3.3	1	Above Moderate	YES	
1170	47718101	47 E CHURCH AVE	0.38	Residential - Low Density	RS-3	3.3	1	Above Moderate	YES	
1171	47718102		0.20	Residential - Low Density	RS-3	3.3	1	Above Moderate	YES	
1172	47718103	43 E CHURCH AVE	0.20	Residential - Low Density	RS-3	3.3	1	Above Moderate	YES	
1173	47718104		0.20	Residential - Low Density	RS-3	3.3	1	Above Moderate	YES	
1174	47718105S	136 E CHURCH AVE	0.21	Residential - Low Density	RS-3	3.3	1	Above Moderate	YES	
1175	47718106		0.31	Residential - Low Density	RS-3	3.3	1	Above Moderate	YES	
1176	47718107		0.41	Residential - Low Density	RS-3	3.3	1	Above Moderate	YES	
1177	47718112	2365 S THORNE AVE	0.15	Residential - Low Density	RS-3	3.3	1	Above Moderate	YES	
1178	47706003	65 E CHURCH AVE	9.53	Residential - Low Density	RS-3	3.3	32	Above Moderate	YES	
1180	47718202	2364 S WALNUT AVE	0.41	Residential - Medium Density	RS-5	8.4	3	Above Moderate	YES	
1181	47718205	2380 S WALNUT AVE	0.15	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1182	47718206	2378 S WALNUT AVE	0.12	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1183	47718217	115 E CHURCH AVE	0.47	Residential - Low Density	RS-3	3.3	2	Above Moderate	YES	
1184	47718207	2382 S WALNUT AVE	0.19	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
1194	47719102S	231 W GROVE AVE	0.37	Residential - Medium Density	RS-5	8.4	3	Above Moderate	YES	
1195	47719207S		0.14	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1196	47719208S	11 E BYRD AVE	0.16	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1197	47719205	25 E BYRD AVE	0.30	Residential - Medium Density	RS-5	8.4	3	Above Moderate	YES	
1198	47719403	40 E BYRD AVE	0.31	Residential - Medium Density	RS-5	8.4	3	Above Moderate	YES	
1199	47719401	10 E BYRD AVE	0.30	Residential - Medium Density	RS-5	8.4	3	Above Moderate	YES	
1200	47719310	248 W KAVILAND AVE	0.36	Residential - Medium Density	RS-5	8.4	3	Above Moderate	YES	
1201	47721115	253 W KAVILAND AVE	0.18	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
1202	47721109	234 W GARRETT AVE	0.36	Residential - Medium Density	RS-5	8.4	3	Above Moderate	YES	
1203	47721204	37 E GARRETT AVE	0.31	Residential - Medium Density	RS-5	8.4	3	Above Moderate	YES	
1204	47722259		0.16	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1206	47722254		0.22	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	

Site ID	APN	Address	Size (acres)	General Plan Land Use Designation	Zoning	Assumed Density (per acre)	Units	Income Level	In 5th Cycle Housing Element?	Environmental Constraint
1207	47722271	265 E JENSEN AVE	0.28	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
1208	47722103	130 E KAVILAND AVE	0.23	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
1209	47720052	182 E BYRD AVE	0.21	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
1210	47720015	2520 S WALNUT AVE	0.17	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1211	47720011		0.18	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
1212	47915103	330 E GROVE AVE	0.18	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
1213	47915112	357 E BYRD AVE	0.36	Residential - Medium Density	RS-5	8.4	3	Above Moderate	YES	
1214	47915117	341 E BYRD AVE	0.18	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
1215	47915204	370 E BYRD AVE	0.18	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
1216	47915217	410 E BYRD AVE	0.37	Residential - Medium Density	RS-5	8.4	3	Above Moderate	YES	
1217	47915221		0.18	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
1218	47919119	408 E KAVILAND AVE	0.19	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
1219	47919113		0.36	Residential - Medium Density	RS-5	8.4	3	Above Moderate	NO	
1220	47919209		0.39	Residential - Medium Density	RS-5	8.4	3	Above Moderate	YES	
1221	47904032	756 E JENSEN AVE	1.18	Commercial - Regional	CR	40.00	47	Lower	YES	
1229	32813102	2958 S NEWMAN AVE	0.07	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	NO	
1230	32813104	2962 S NEWMAN AVE	0.15	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	YES	
1231	32813110	2980 S NEWMAN AVE	0.15	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	YES	
1232	32813128		0.52	Residential - Medium Low Density	RS-4	4.8	2	Above Moderate	YES	
1233	32813222	2953 S NEWMAN AVE	0.14	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	YES	
1234	32813221	2957 S NEWMAN AVE	0.07	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	NO	
1235	32813204	2962 S HARDT AVE	0.15	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	YES	
1236	32813205	2968 S HARDT AVE	0.15	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	YES	
1237	32813214	2981 S NEWMAN AVE	0.12	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	NO	
1238	32813213	2987 S NEWMAN AVE	0.17	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	YES	
1239	32813226	2993 S NEWMAN AVE	0.29	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	YES	
1240	32813314	2955 S HARDT AVE	0.22	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	YES	
1241	32813313	2959 S HARDT AVE	0.15	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	YES	
1242	32813303	2972 S WALNUT AVE	0.15	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	YES	
1243	32813304	2978 S WALNUT AVE	0.15	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	YES	
1244	32813310	2973 S HARDT ST	0.07	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	NO	
1245	32818110	739 E SAMSON AVE	0.46	Residential - Medium Low Density	RS-4	4.8	2	Above Moderate	YES	
1246	32818108	739 E SAMSON AVE	0.46	Residential - Medium Low Density	RS-4	4.8	2	Above Moderate	YES	
1247	32818111	2908 S MARTIN LUTHER KING JR BLVD	3.19	Residential - Medium Low Density	RS-4	4.8	15	Above Moderate	YES	
1248	32818101	2902 S MARTIN LUTHER KING JR BLVD	0.31	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	YES	
1249	32816118		0.19	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	YES	

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1250	32816111	837 E HARDY AVE	0.19	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	NO	
1251	32816310	2990 S MARTIN LUTHER KING JR BLVD	0.14	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	YES	
1252	32818203	2918 S WELLER ST	0.24	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
1253	32818216	2927 S MARTIN LUTHER KIN JR BLVD	0.17	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1254	32818506	1030 E CHESTER AVE	0.21	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
1255	32817201		0.27	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
1256	32817105		0.17	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1257	32817127		0.16	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1258	32817208		0.22	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
1259	32916106		0.34	Residential - Medium Density	RS-5	8.4	3	Above Moderate	YES	
1260	32916124	348 W ALMY AVE	0.50	Residential - Medium Density	RS-5	8.4	4	Above Moderate	YES	
1261	32916123	338 W ALMY AVE	0.99	Residential - Medium Density	RS-5	8.4	8	Above Moderate	YES	
1262	32916122	304 W ALMY AVE	0.47	Residential - Medium Density	RS-5	8.4	4	Above Moderate		
1263	32916121		0.40	Residential - Medium Density	RS-5	8.4	3	Above Moderate	YES	
1264	32916143		0.48	Residential - Medium Density	RS-5	8.4	4	Above Moderate	YES	
1265	32916118		0.35	Residential - Medium Density	RS-5	8.4	3	Above Moderate	YES	
1266	32916201	3078 S FIG AVE	0.34	Residential - Medium Density	RS-5	8.4	3	Above Moderate	YES	
1267	32916222	379 W ALMY AVE	0.21	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
1268	32920038	276 W ROY AVE	0.15	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1269	32817309 32815017	2985 S CLARA AVE	0.39	Residential - Medium Density	RS-5	8.4	3	Above Moderate	NO	
1270	32817311		0.11	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1271	32815021		0.49	Residential - Medium Density	RS-5	8.4	4	Above Moderate	YES	
1272	32815022		0.73	Residential - Medium Density	RS-5	8.4	6	Above Moderate	NO	
1273	32815012	92 W NORTH AVE	0.94	Residential - Medium Density	RS-5	8.4	8	Above Moderate	NO	
1274	32815043		0.68	Neighborhood Mixed-Use	NMX	32.0	22	Lower	NO	
1277	47904014		5.27	Residential - Medium Density	RS-5	8.4	44	Above Moderate	YES	
1278	47927001	1309 E ANNADALE AVE	4.78	Residential - Medium Density	RS-5	8.4	40	Above Moderate	YES	
1280	47904026		3.37	Residential - Medium Density	RS-5	8.4	24	Above Moderate	YES	
1281	47923123		0.25	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
1282	47916412	1245 E KAVILAND AVE	0.19	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
1283	47916322		0.16	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1284	47902052		5.12	Residential - Medium Density	RS-5	8.4	43	Above Moderate	YES	
1285	47902035	2582 S ELM AVE	2.36	Corridor - Center Mixed Use	CMX	37.50	88	Lower	YES	
1286	47902036		2.44	Corridor - Center Mixed Use	CMX	37.50	5	Above Moderate	YES	
	47921109						86	Lower	NO	

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1287	47902033	2512 S ELM AVE	0.41	Corridor - Center Mixed Use	CMX	37.50	26	Above Moderate	YES	
	47921110	2579 S ELM AVE	0.28							
1290	47917115		0.14	Corridor - Center Mixed Use	CMX	37.50	5	Above Moderate	NO	
1292	47921514	2015 E JENSEN AVE	0.74	Residential - Medium Density	RS-5	8.4	6	Above Moderate	YES	
1294	47912116		0.14	Corridor - Center Mixed Use	CMX	37.50	5	Above Moderate	NO	
1295	47912120		0.14	Corridor - Center Mixed Use	CMX	37.50	5	Above Moderate	NO	
1296	47912117		0.14	Corridor - Center Mixed Use	CMX	37.50	5	Above Moderate	NO	
1297	47909403		0.15	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1298	47902049		18.87	Residential - Medium Density	RS-5	8.4	159	Above Moderate	YES	
1299	47811328		0.42	Residential - Medium Density	RS-5	8.4	4	Above Moderate	YES	
1300	47817312		0.14	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1301	47818109	2328 S EUNICE AVE	0.15	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1302	47818201		0.17	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1303	47818237	2317 S EUNICE AVE	0.16	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1304	47818236	2321 S EUNICE AVE	0.16	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1305	47818202		0.26	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
1306	47818306		0.35	Neighborhood Mixed-Use	NMX	32.0	11	Above Moderate	YES	
1307	47818312		1.14	Residential - Medium Density	RS-5	8.4	10	Above Moderate	YES	
1308	47818317	2346 S ELM AVE	2.36	Neighborhood Mixed-Use	NMX	32.0	76	Lower	YES	
1309	47825402	2356 S ELM AVE	0.50	Neighborhood Mixed-Use	NMX	32.0	16	Lower	YES	
1310	47825313	2392 S GENEVA AVE	0.14	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1311	47825405		0.44	Residential - Medium Density	RS-5	8.4	4	Above Moderate	YES	
1312	47826135		0.69	Neighborhood Mixed-Use	NMX	32.0	22	Lower	YES	
1313	47819132	2345 S ELM AVE	0.17	Neighborhood Mixed-Use	NMX	32.0	6	Above Moderate	YES	
1314	47819120		0.11	Neighborhood Mixed-Use	NMX	32.0	4	Above Moderate	NO	
1315	47819124		0.11	Neighborhood Mixed-Use	NMX	32.0	3	Above Moderate	NO	
1316	47819122	2305 S ELM AVE	0.59	Neighborhood Mixed-Use	NMX	32.0	19	Lower	YES	
1317	47827428		0.16	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	FEMA 100-year flood zone
1318	47820326		4.14	Residential - Medium Density	RS-5	8.4	35	Above Moderate	NO	FEMA 100-year flood zone
1319	47816105	2521 E FLORENCE AVE	0.20	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
1320	47816104	2291 S CHERRY AVE	0.26	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	FEMA 100-year flood zone
1321	47816102	2261 S CHERRY AVE	0.17	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	FEMA 100-year flood zone
1322	47816101		0.14	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	FEMA 100-year flood zone
1323	47815414		0.17	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	FEMA 100-year flood zone
1324	47815413		0.27	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	FEMA 100-year flood zone
1325	47815308	2250 S NICHOLAS AVE	0.13	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1326	47815326		0.13	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1327	47815332	2301 E FLORENCE AVE	0.30	Residential - Medium Density	RS-5	8.4	3	Above Moderate	YES	

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1328	47815228	2414 S ROSE AVE	0.29	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
1329	47809305	2167 S ROSE AVE	0.13	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1330	47809512	2038 E CALIFORNIA AVE	0.14	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1331	47809513		0.14	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1332	47808323	2108 S LOTUS AVE	0.22	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
1333	46713417		0.10	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1334	46713401		0.34	Residential - Medium Density	RS-5	8.4	3	Above Moderate	NO	
1335	46713414		0.17	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1336	46713611		0.48	Residential - Medium Density	RS-5	8.4	4	Above Moderate	YES	
1337	46713513		0.54	Residential - Medium Density	RS-5	8.4	5	Above Moderate	YES	
1338	46713509		0.22	Residential - Medium Density	RS-5	8.4	2	Above Moderate	NO	
1339	46713303	245 F ST	0.17	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1340	46713202		0.13	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1341	47814106		0.11	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1343	47813424	2226 S ELM AVE	0.23	Neighborhood Mixed-Use	NMX	32.0	7	Above Moderate	YES	
1344	47813406	2240 S ELM AVE	0.19	Neighborhood Mixed-Use	NMX	32.0	6	Above Moderate	YES	
1345	47813407		0.38	Neighborhood Mixed-Use	NMX	32.0	12	Above Moderate	YES	
1346	47807219	2186 S IVY AVE	0.19	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
1347	46730154	1003 SANTA CLARA ST	0.12	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1348	46730169	1031 SANTA CLARA ST	0.10	Neighborhood Mixed-Use	NMX	32.0	3	Above Moderate	NO	
1349	46717215	538 B ST	0.13	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1350	46717210		0.17	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1351	46717219		0.26	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
1352	46712510	504 C ST	0.22	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
1353	46712514	532 C ST	0.27	Neighborhood Mixed-Use	NMX	32.0	9	Above Moderate	YES	
1354	46716603	745 B ST	0.17	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1355	46716508	801 B ST	0.17	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1356	46711605	734 C ST	0.13	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1357	46711606	736 C ST	0.13	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1358	46711607	738 C ST	0.09	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1359	46711501		0.37	Residential - Medium Density	RS-5	8.4	3	Above Moderate	YES	
1360	46711411		0.30	Residential - Medium Density	RS-5	8.4	3	Above Moderate	YES	
1361	46716101	1138 TULARE ST	0.34	Residential - Medium Density	RS-5	8.4	3	Above Moderate	YES	
1362	46716402	949 B ST	0.34	Residential - Medium Density	RS-5	8.4	3	Above Moderate	YES	
1363	46716404	929 B ST	0.17	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1364	46716406	913 B ST	0.17	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	

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1365	46724601T	731 E CALIFORNIA AVE	0.24	Neighborhood Mixed-Use	NMX	32.0	93	Lower	NO	
	46724506T	537 INYO ST	0.18						YES	
	46724505T	811 WATERMAN AVE	0.09						NO	
	46724504T	813 WATERMAN AVE	0.09						NO	
	46724503T		0.17						NO	
	46724510T	842 KLETTE AVE	1.33						YES	
	46724508T									
	46724512T	864 KLETTE AVE								
	46724509T									
	46724511T	854 KLETTE AVE								
	46724507T	661 E CALIFORNIA AVE								
	46726203T	851 KLETTE AVE	0.69						YES	
	46726202T									
	46726201T									
	46726204T	601 E CALIFORNIA AVE	0.14						YES	
1380	46724416	514 TULARE ST	0.17	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1381	46723611	1020 WATERMAN AVE	0.17	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1382	46723613		0.17	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1383	46723317	716 MARIPOSA ST	0.06	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1384	46718707	831 TULARE ST	0.17	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1385	46718714	1060 COLLINS AVE	0.17	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1386	46718609T	1128 COLLINS AVE	0.34	Residential - Medium Density	RS-5	8.4	3	Above Moderate	YES	
1387	46718620	1143 MAYOR AVE	0.17	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1388	46718418	924 MARIPOSA ST	0.17	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1389	46718414	1028 MAYOR AVE	0.17	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1390	46715602		0.17	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1391	46715507T	1107 B ST	0.15	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1392	46715508		0.11	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1393	46715516		0.26	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
1394	46715504	1129 B ST	0.17	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1396	46715211	1122 B ST	0.17	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1397	46715221	1160 FRESNO ST	0.50	Neighborhood Mixed-Use	NMX	32.0	16	Lower	NO	
	46715204	1143 C ST								
1398	46715301		0.70	Neighborhood Mixed-Use	NMX	32.0	22	Lower	YES	
	46715303									
	46715302									
1399	46715307	1109 TULARE ST	0.35	Residential - Medium Density	RS-5	8.4	3	Above Moderate	NO	
1400	46710601		0.32	Neighborhood Mixed-Use	NMX	32.0	10	Above Moderate	YES	

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1405	46521410	15 E TUOLUMNE ST	0.12	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1406	46521408		0.08	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1407	46521503		0.16	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1408	46525105		0.16	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1409	46715425	1260 A ST	0.22	Neighborhood Mixed-Use	NMX	32.0	7	Above Moderate	YES	
1410	46715414	1246 A ST	0.13	Neighborhood Mixed-Use	NMX	32.0	4	Above Moderate	YES	
1411	46715422		0.09	Neighborhood Mixed-Use	NMX	32.0	3	Above Moderate	NO	
1413	46517601		0.17	Residential - Medium Density	RS-5	8.48.4	1	Above Moderate	YES	
1414	46517502		0.17	Residential - Medium Density	RS-5	8.48.4	1	Above Moderate	YES	
1415	46517211		0.17	Residential - Medium Density	RS-5	8.48.4	1	Above Moderate	YES	
1416	46517215		0.17	Residential - Medium Density	RS-5	8.48.4	1	Above Moderate	NO	
1417	46517216		0.35	Residential - Medium Density	RS-5	8.48.4	3	Above Moderate	YES	
1418	46517421T	1511 B ST	0.13	Residential - Medium Density	RS-5	8.48.4	1	Above Moderate	YES	
1419	46517422T	1515 B ST	0.13	Residential - Medium Density	RS-5	8.48.4	1	Above Moderate	YES	
1420	46517413	1540 A ST	0.13	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1421	46516518	1625 B ST	0.26	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
1422	46516428		0.12	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1424	46516107		0.17	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1425	46512503		0.17	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1426	46512516	1738 C ST	0.17	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1427	46512517	1730 C ST	0.17	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1428	46512539		0.10	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1430	46521301	206 E SAN JOAQUIN ST	0.24	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
1431	46519510	129 E SAN JOAQUIN ST	0.16	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1432	46519516	121 E SAN JOAQUIN ST	0.16	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1433	46412207	120 W CHANDLER AVE	0.36	Residential - Medium Density	RS-5	8.4	3	Above Moderate	YES	
1434	46411318	824 S THORNE AVE	0.54	Residential - Medium Density	RS-5	8.4	5	Above Moderate	YES	
1435	46411314	129 W AMADOR ST	0.25	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
1436	46411313T	130 W LEMON AVE	0.14	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1437	46411310	146 W LEMON AVE	0.37	Residential - Medium Density	RS-5	8.4	3	Above Moderate	YES	
1438	46411311	241 W AMADOR ST	0.67	Residential - Medium Density	RS-5	8.4	6	Above Moderate	YES	
1439	46411107	311 W WHITES BRIDGE AVE	0.18	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
1441	46519303	216 E AMADOR ST	0.13	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1442	46518613	211 E AMADOR ST	0.16	Neighborhood Mixed-Use	NMX	32.0	5	Above Moderate	YES	
1443	46518612	217 E AMADOR ST	0.16	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1444	46518604	228 E WHITES BRIDGE AVE	0.15	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1445	46518605	236 E WHITES BRIDGE AVE	0.23	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
1446	46518515	748 S MODOC ST	0.16	Neighborhood Mixed-Use	NMX	32.0	5	Above Moderate	YES	

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1447	46518409	47 E AMADOR ST	0.16	Neighborhood Mixed-Use	NMX	32.0	5	Above Moderate	NO	
1448	46518415	26 E WHITES BRIDGE AVE	0.23	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
1449	46518312	225 E WHITES BRIDGE AVE	0.13	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1450	46518208	153 E WHITES BRIDGE AVE	0.13	Neighborhood Mixed-Use	NMX	32.0	4	Above Moderate	YES	
1451	46518107	43 E WHITES BRIDGE AVE	0.17	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1452	46518108	35 E WHITES BRIDGE AVE	0.17	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1453	46518109	27 E WHITES BRIDGE AVE	0.17	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1454	46518110	19 E WHITES BRIDGE AVE	0.17	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1455	46518103	34 E ONEIL AVE	0.17	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1456	46518205	142 E ONEIL AVE	0.17	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1457	45822011	550 S THORNE AVE	1.38	Residential - Medium Density	RS-5	8.4	12	Above Moderate	YES	
1458	45822028		0.43	Residential - Medium Density	RS-5	8.4	4	Above Moderate	YES	
1460	45821218	148 W EL DORADO ST	0.20	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
1461	45821221	222 W EL DORADO ST	0.25	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
1462	45821222	228 W EL DORADO ST	0.49	Residential - Medium Density	RS-5	8.4	4	Above Moderate	YES	
1463	45821226		0.19	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
1464	45821227	328 W EL DORADO ST	0.42	Residential - Medium Density	RS-5	8.4	3	Above Moderate	YES	
1465	45821229	410 W EL DORADO ST	0.57	Residential - Medium Density	RS-5	8.4	5	Above Moderate	YES	
1466	45821230	441 S FRUIT AVE	0.30	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
1467	45821233	421 S FRUIT AVE	1.14	Residential - Medium Density	RS-5	8.4	10	Above Moderate	YES	
1468	45821242	407 W DUNN AVE	2.29	Residential - Medium Density	RS-5	8.4	19	Above Moderate	NO	
1469	45821238		0.25	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
1470	45821211	145 W DUNN AVE	0.22	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
1471	45821166	144 E DUNN AVE	0.07	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1472	45821178		0.10	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1473	45821168	232 W DUNN AVE	0.13	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1474	45821170		0.10	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1475	45821158		0.14	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1476	45821156	316 W DUNN AVE	0.17	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1477	45821185		0.12	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1478	45821173	412 W DUNN AVE	0.19	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
1479	46510605	25 E DUNN AVE	0.34	Residential - Medium Density	RS-5	8.4	3	Above Moderate	YES	
1480	46510602		0.07	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1481	46510701	345 S PLUMAS ST	0.25	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
1489	46706124T	1535 FRESNO ST	0.34	Downtown Neighborhood	DTN	76.0	25	Above Moderate	YES	
1490	46706123T		0.12	Downtown Neighborhood	DTN	76.0	9	Above Moderate	YES	
1492	46706211T	1526 FRESNO ST	0.26	Downtown Neighborhood	DTN	76.0	20	Above Moderate	YES	
1496	46710305		0.21	Downtown Neighborhood	DTN	76.0	16	Above Moderate	YES	

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1498	46706611	1427 TULARE ST	0.17	Downtown Neighborhood	DTN	76.0	13	Above Moderate	YES	
1500	46706613	1047 F ST	0.13	Downtown Neighborhood	DTN	76.0	10	Above Moderate	NO	
1503	46706333	1042 F ST	0.09	Downtown Neighborhood	DTN	76.0	7	Above Moderate	NO	
1504	46706332		0.04	Downtown Neighborhood	DTN	76.0	3	Above Moderate	YES	
1505	46706330	1033 CHINA ALY	0.09	Downtown Neighborhood	DTN	76.0	7	Above Moderate	NO	
1506	46706329		0.17	Downtown Neighborhood	DTN	76.0	13	Above Moderate	YES	
1507	46706328		0.03	Downtown Neighborhood	DTN	76.0	2	Above Moderate	NO	
1508	46706326	1020 F ST	0.04	Downtown Neighborhood	DTN	76.0	3	Above Moderate	NO	
1509	46706325	1016 F ST	0.17	Downtown Neighborhood	DTN	76.0	13	Above Moderate	YES	
1511	46706320		0.02	Downtown Neighborhood	DTN	76.0	1	Above Moderate	NO	
1514	46706304		0.04	Downtown Neighborhood	DTN	76.0	3	Above Moderate	NO	
1515	46706344	1034 CHINA ALY	0.27	Downtown Neighborhood	DTN	76.0	21	Above Moderate	YES	
1516	46706339		0.11	Downtown Neighborhood	DTN	76.0	9	Above Moderate	NO	
1517	46706311		0.09	Downtown Neighborhood	DTN	76.0	7	Above Moderate	NO	
1518	46706312	1022 CHINA ALY	0.26	Downtown Neighborhood	DTN	76.0	20	Above Moderate	YES	
1519	46706335		0.14	Downtown Neighborhood	DTN	76.0	11	Above Moderate	YES	
1522	46707412 46707411	950 E ST	0.52	Downtown Neighborhood	DTN	76.0	39	Lower	YES	
1528	46707202	811 G ST	1.21	Downtown Neighborhood	DTN	76.0	92	Lower	YES	
1529	46707316T	730 F ST	0.60	Downtown Neighborhood	DTN	76.0	46	Lower	YES	
1530	46707305T	723 G ST	0.09	Downtown Neighborhood	DTN	76.0	7	Above Moderate	YES	
1531	46707306T		0.18	Downtown Neighborhood	DTN	76.0	13	Above Moderate	YES	
1537	46708123		0.05	Downtown Neighborhood	DTN	76.0	4	Above Moderate	NO	
1539	46712118		0.08	Downtown Neighborhood	DTN	76.0	6	Above Moderate	YES	
1540	46712117	615 E ST	0.60	Downtown Neighborhood	DTN	76.0	46	Lower	YES	
	46712115									
	46712113	637 E ST								
	46712112	625 E ST								
1552	46827717	101 VAN NESS AVE	0.70	Downtown Neighborhood	DTN	76.0	53	Lower	NO	
1553	46823527		1.20	Downtown Neighborhood	DTN	76.0	91	Lower	NO	
1554	46827423		0.17	Downtown Neighborhood	DTN	76.0	13	Above Moderate	NO	
1555	46827109	2115 MONTEREY ST	0.25	Downtown Neighborhood	DTN	76.0	19	Above Moderate	NO	
1556	46827104	343 L ST	0.12	Downtown Neighborhood	DTN	76.0	9	Above Moderate	NO	
1557	46827105	333 L ST	0.17	Downtown Neighborhood	DTN	76.0	13	Above Moderate	NO	
1558	46823413	351 M ST	0.08	Downtown Neighborhood	DTN	76.0	6	Above Moderate	NO	
1559	46823113		0.17	Downtown Neighborhood	DTN	76.0	13	Above Moderate	NO	
1560	46830504	1804 SAN BENITO ST	0.25	Downtown Neighborhood	DTN	76.0	19	Above Moderate	NO	
1562	46705013ST	555 H ST	1.47	Downtown Neighborhood	DTN	76.0	111	Lower	YES	

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1563	46829506	550 H ST	0.62	Downtown Neighborhood	DTN	76.0	47	Lower	YES	
1565	46829205	514 BROADWAY	0.41	Downtown Neighborhood	DTN	76.0	31	Above Moderate	YES	
1568	46829301	461 FULTON ST	0.19	Downtown Neighborhood	DTN	76.0	14	Above Moderate	NO	
1569	46829319	447 FULTON ST	0.07	Downtown Neighborhood	DTN	76.0	6	Above Moderate	NO	
1571	46826209	511 L ST	0.17	Downtown General	DTG	83.0	14	Above Moderate	YES	
1573	46822212T	550 M ST	0.30	Downtown General	DTG	83.0	25	Above Moderate	YES	
1574	46822215T	525 N ST	0.26	Downtown General	DTG	83.0	50	Lower	YES	
	46822216T	505 N ST	0.34							
1576	46822301T	461 N ST	0.17	Downtown General	DTG	83.0	36	Above Moderate	NO	
	46822302T	453 N ST	0.09							
	46822319T		0.17							
1580	46819213T	2504 VENTURA ST	0.15	Downtown General	DTG	83.0	79	Lower	YES	
	46819214T	2518 VENTURA ST	0.30							
	46819236	530 O ST	0.06							
	46819237	534 O ST	0.19							
	46819222	2526 VENTURA ST	0.14							
	46819227	2534 VENTURA ST	0.12							
1590	46821220	800 M ST	0.74	Downtown General	DTG	83.0	61	Lower	YES	
1594	46826117		0.17	Downtown General	DTG	83.0	14	Above Moderate	YES	
1595	46826111		0.17	Downtown General	DTG	83.0	14	Above Moderate	YES	
1602	46828607	702 H ST	0.17	Downtown Neighborhood	DTN	76.0	13	Above Moderate	YES	
1605	46825401	2030 TULARE ST	0.52	Downtown Core	DTC	90.0	46	Lower	YES	
	46825402	2060 TULARE ST								
1613	46620518T	1408 H ST	0.29	Downtown Core	DTC	90.0	26	Above Moderate	NO	
1621	46611308	2301 FRESNO ST	0.59	Downtown General	DTG	83.0	49	Lower	YES	
1625	46608122	2528 TUOLUMNE ST	0.34	Downtown Neighborhood	DTN	76.0	26	Above Moderate	YES	
1627	46608104	1333 P ST	0.17	Downtown Neighborhood	DTN	76.0	13	Above Moderate	YES	
1628	46605512		0.17	Downtown Neighborhood	DTN	76.0	13	Above Moderate	YES	
1629	46605509	2615 MERCED ST	0.11	Downtown Neighborhood	DTN	76.0	9	Above Moderate	NO	
1631	46605607	2627 FRESNO ST	0.21	Downtown General	DTG	83.0	17	Above Moderate	YES	
1636	46607101	75 N BLACKSTONE AVE	0.17	Downtown Neighborhood	DTN	76.0	13	Above Moderate	YES	
1637	46607406	1509 O ST	0.34	Downtown Neighborhood	DTN	76.0	26	Above Moderate	YES	
1638	45932702	2415 CALAVERAS ST	0.70	Downtown Neighborhood	DTN	76.0	53	Lower	YES	
	45932701	1660 N ST								
1643	46614209	1528 VAN NESS AVE	0.34	Downtown Neighborhood	DTN	76.0	26	Above Moderate	YES	
1651	46613418	2024 AMADOR ST	0.17	Downtown Neighborhood	DTN	76.0	13	Above Moderate	YES	
1653	46613213	1762 VAN NESS AVE	0.26	Downtown Neighborhood	DTN	76.0	20	Above Moderate	YES	
1654	46610332	14 N PARK AVE	0.28	Downtown Neighborhood	DTN	76.0	22	Above Moderate	YES	

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1656	46613328	1845 VAN NESS AVE	0.33	Downtown Neighborhood	DTN	76.0	25	Above Moderate	YES	
1661	45825012	101 N ROOSEVELT AVE	1.04	Neighborhood Mixed-Use	NMX	32.0	33	Lower	YES	
1663	45920007		0.22	Neighborhood Mixed-Use	NMX	32.0	7	Above Moderate	YES	
1664	45929219		0.29	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
1665	45922122S	252 N BROADWAY	0.16	Neighborhood Mixed-Use	NMX	32.0	5	Above Moderate	YES	
1666	45930120	140 N BROADWAY	0.14	Neighborhood Mixed-Use	NMX	32.0	4	Above Moderate	YES	
1668	45930236	181 N FULTON ST	0.24	Neighborhood Mixed-Use	NMX	32.0	8	Above Moderate	YES	
1669	45913218		0.06	Residential - Medium Density	RS-5	8.4	0	Above Moderate	NO	
1670	45930328		0.39	Neighborhood Mixed-Use	NMX	32.0	12	Above Moderate	YES	
1671	45930312		0.12	Neighborhood Mixed-Use	NMX	32.0	4	Above Moderate	NO	
1672	45930604	943 E DIVISADERO ST	0.11	Neighborhood Mixed-Use	NMX	32.0	3	Above Moderate	NO	
1673	45931126	106 N VAN NESS AVE	0.19	Neighborhood Mixed-Use	NMX	32.0	6	Above Moderate	YES	
1674	45905120	1045 E FRANKLIN AVE	0.12	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1675	45914501	380 N POPLAR AVE	0.20	Residential - Medium Density	RS-5	8.4	2	Above Moderate	NO	
1676	45932113	208 N SAN PABLO AVE	0.15	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1677	45931809	1325 E DIVISADERO ST	0.37	Neighborhood Mixed-Use	NMX	32.0	12	Above Moderate	YES	
1678	45932103	121 N GLENN AVE	0.27	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
1679	45932506	25 N CALAVERAS ST	0.21	Neighborhood Mixed-Use	NMX	32.0	7	Above Moderate	YES	
1682	45915319	382 N CALAVERAS ST	0.13	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1685	45916104	357 N ABBY ST	0.16	Corridor - Center Mixed Use	CMX	37.50	6	Above Moderate	NO	
1686	45907107	437 N ABBY ST	0.12	Corridor - Center Mixed Use	CMX	37.50	4	Above Moderate	NO	
1688	45229315		0.17	Neighborhood Mixed-Use	NMX	32.0	6	Above Moderate	YES	
1689	45229425		0.05	Residential - Medium Density	RS-5	8.4	0	Above Moderate	NO	
1690	45229426		0.05	Residential - Medium Density	RS-5	8.4	0	Above Moderate	NO	
1692	45230130	534 N BLACKSTONE AVE	0.71	Corridor - Center Mixed Use	CMX	37.50	27	Lower	YES	
	45230127	1731 E BELMONT AVE								
	45230125									
	45230126	1737 E BELMONT AVE								
1693	45230226		0.06	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1694	45230211	1931 E WHITE AVE	0.09	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1695	45907204	457 N EFFIE ST	0.17	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1696	45916305	361 N DIANA ST	0.14	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1697	45925319	266 N EFFIE ST	0.09	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1698	45925318		0.17	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1699	45925317	256 N EFFIE ST	0.09	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1700	45925214		0.15	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1701	45925312	214 N EFFIE ST	0.17	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1702	45925311	202 N EFFIE ST	0.18	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	

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1703	45925306		0.18	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
1704	45925310	1931 E ILLINOIS AVE	0.18	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
1705	45933302	175 N DIANA ST	0.26	Residential - Medium Density	RS-5	8.4	2	Above Moderate	NO	
1706	45933303		0.26	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
1707	45933321	129 N DIANA ST	0.24	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
1708	45925405	257 N CLARK ST	0.13	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1710	45916401U		1.72	Residential - Medium Density	RS-5	8.4	14	Above Moderate	YES	
1711	45917134		0.06	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1712	45917105	359 N VALERIA ST	0.14	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1713	45907413U		1.59	Residential - Medium Density	RS-5	8.4	13	Above Moderate	YES	
1714	45907416	2020 E BELMONT AVE	0.22	Neighborhood Mixed-Use	NMX	32.0	7	Above Moderate	YES	
1715	45908103	469 N VALERIA ST	0.13	Neighborhood Mixed-Use	NMX	32.0	4	Above Moderate	YES	
1716	45908231		0.30	Neighborhood Mixed-Use	NMX	32.0	10	Above Moderate	YES	
1718	45231101	2060 E THOMAS AVE	0.17	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1719	45231302	2320 E THOMAS AVE	0.17	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1720	45231309	639 N FRESNO ST	0.13	Neighborhood Mixed-Use	NMX	32.0	4	Above Moderate	NO	
1721	45917324	359 N FRESNO ST	0.11	Neighborhood Mixed-Use	NMX	32.0	4	Above Moderate	NO	
1722	45917326	331 N FRESNO ST	0.14	Neighborhood Mixed-Use	NMX	32.0	4	Above Moderate	YES	
1723	45917340	317 N FRESNO ST	0.31	Neighborhood Mixed-Use	NMX	32.0	10	Above Moderate	YES	
1724	45224419	704 N FRESNO ST	0.35	Neighborhood Mixed-Use	NMX	32.0	11	Above Moderate	YES	
1725	45232415	530 N FRESNO ST	0.17	Neighborhood Mixed-Use	NMX	32.0	5	Above Moderate	YES	
1728	45910133	2902 E BELMONT AVE	0.09	Neighborhood Mixed-Use	NMX	32.0	3	Above Moderate	NO	
1729	45909322		0.15	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1730	45927414	261 N ANGUS ST	0.16	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1731	45927106	267 N U ST	0.12	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1734	45927116	212 N FRESNO ST	0.14	Neighborhood Mixed-Use	NMX	32.0	4	Above Moderate	YES	
1735	45927214	217 N MARIPOSA ST	0.13	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
1736	45935134		0.17	Neighborhood Mixed-Use	NMX	32.0	6	Above Moderate	YES	
1737	46604311	1045 U ST	0.55	Downtown Neighborhood	DTN	76.0	41	Lower	YES	
1738	46604201	1050 S ST	0.36	Downtown Neighborhood	DTN-AH	32.0	11	Above Moderate	YES	
1739	46603505	2831 MARIPOSA ST	0.25	Downtown Neighborhood	DTN-AH	32.0	8	Above Moderate	YES	
1742	31025012	6512 E CLINTON AVE	2.97	Residential Low Density	RS-1	0.8	2	Above Moderate	YES	
1744	51222418	4405 N HAYES AVE	0.87	Residential - Medium Density	RS-5	8.4	7	Above Moderate	YES	
1745	57907546		13.34	Residential - Medium Low Density	RS-4	4.8	64	Above Moderate	YES	
1746	46724102	617 KERN ST	0.17	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1747	46002323	3350 E BELMONT AVE	0.12	Neighborhood Mixed-Use	NMX	32.0	4	Above Moderate	NO	
1749	45202103	326 E OLIVE AVE	0.11	Commercial - Main Street	CMS	24.00	3	Above Moderate	NO	
1751	46823403		0.17	Downtown Neighborhood	DTN	76.0	13	Above Moderate	NO	

Site ID	APN	Address	Size (acres)	General Plan Land Use Designation	Zoning	Assumed Density (per acre)	Units	Income Level	In 5th Cycle Housing Element?	Environmental Constraint
1753	45129228 45129202 45129201	1270 N ABBY ST	0.32	Neighborhood Mixed-Use	NMX	32.0	10	Above Moderate	NO	
1754	45921228	208 N ECHO AVE	0.10	Residential - Medium Density	RS-5	8.4	0	Above Moderate	NO	
1755	46005120	3931 E MADISON AVE	0.14	Residential - Medium Density	RS-5	8.4	0	Above Moderate	NO	
1756	46013104	3924 E GRANT AVE	0.14	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1757	42634219		0.07	Residential - Medium High Density	RM-1	13.6	1	Moderate	NO	
1758	44417204	1522 E YALE AVE	0.12	Residential - Medium High Density	RM-1	13.6	2	Moderate	NO	
1759	44704218		0.30	Residential - Medium High Density	RM-1	13.6	4	Moderate	NO	
1760	44705017		0.11	Residential - Medium High Density	RM-1	13.6	2	Moderate	NO	
1761	44904054	3015 W MCKINLEY AVE	1.06	Residential - Medium High Density	RM-1	13.6	14	Moderate	NO	
1762	45224121	2552 E LEWIS AVE	0.17	Residential - Medium High Density	RM-1	13.6	2	Moderate	YES	
1763	45402204	3280 E OLIVE AVE	0.11	Residential - Medium High Density	RM-1	13.6	1	Moderate	NO	
1764	45402220S	3271 E CLAY AVE	0.15	Residential - Medium High Density	RM-1	13.6	2	Moderate	NO	
1765	45402324	3120 E CLAY AVE	0.29	Residential - Medium High Density	RM-1	13.6	4	Moderate	NO	
1766	45402214	3323 E CLAY AVE	0.15	Residential - Medium High Density	RM-1	13.6	2	Moderate	NO	
1767	45402409	3322 E CLAY AVE	0.15	Residential - Medium High Density	RM-1	13.6	2	Moderate	NO	
1768	45402118	3131 E CLAY AVE	0.15	Residential - Medium High Density	RM-1	13.6	2	Moderate	NO	
1769	50733019	4099 W KADOTA AVE	0.13	Residential - Medium High Density	RM-1	13.6	2	Moderate	NO	
1770	50733043		0.15	Residential - Medium High Density	RM-1	13.6	2	Moderate	NO	
1771	51117107	4595 W ASHLAN AVE	2.33	Residential - Medium High Density	RM-1	13.6	32	Moderate	NO	
1772	51117111	4515 W ASHLAN AVE	2.30	Residential - Medium High Density	RM-1	13.6	31	Moderate	NO	
1773	51124017S	3601 N BRAWLEY DR	2.08	Residential - Medium High Density	RM-1	13.6	28	Moderate	NO	
1775	44913010	1715 W DUDLEY AVE	2.36	Residential - Low Density	RS-3	3.3	8	Above Moderate	NO	
1777	57414002	2204 N ARMSTRONG AVE	2.44	Residential - Low Density	RS-3	3.3	8	Above Moderate	NO	
1784	32813219	2965 S NEWMAN AVE	0.07	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	NO	
1785	32813218	2964 S NEWMAN AVE	0.07	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	NO	
1786	32813217	2969 S NEWMAN AVE	0.07	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	NO	
1787	32816309	2986 S MARTIN LUTHER KING JR BLVD	0.12	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	NO	
1788	32816311		0.08	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	NO	
1789	32816312	2996 S MARTIN LUTHER KING JR BLVD	0.08	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	NO	
1790	32818104	2930 S MARTIN LUTHER KING JR BLVD	0.18	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	NO	
1791	44203017	4650 N BRAWLEY AVE	0.22	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	NO	
1792	45613120	712 N PEACH AVE	0.28	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	NO	
1793	48025221	4665 E EUGENIA AVE	0.14	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	NO	
1794	51102117	3207 N POLK AVE	9.55	Residential - Medium Low Density	RS-4	4.8	46	Above Moderate	NO	

Site ID	APN	Address	Size (acres)	General Plan Land Use Designation	Zoning	Assumed Density (per acre)	Units	Income Level	In 5th Cycle Housing Element?	Environmental Constraint
1795	30303333	389 W ALLUVIAL AVE	0.22	Residential - Medium Density	RS-5	8.4	2	Above Moderate	NO	
1796	30304153		0.08	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1797	30304149		0.07	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1798	30304127	288 W PINEDALE AVE	0.14	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1800	30307110		0.06	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1801	30307105		0.06	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1802	30307103		0.06	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1803	30309253		0.11	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1804	30312226		0.12	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1805	30314223	413 W BEECHWOOD AVE	0.10	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1806	32916217	235 W ALMY AVE	0.14	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1807	40805030		2.20	Residential - Medium Density	RS-5	8.4	18	Above Moderate	NO	
1808	43026234		0.12	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1809	43026239		0.10	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1810	43719126		0.08	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1811	44405116T		0.12	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1812	44610118	2243 E CAMBRIDGE AVE	0.09	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1813	44610423		0.10	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1814	44616323		0.10	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1815	44626217		0.17	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1816	45004425	1511 N FRUIT AVE	0.31	Residential - Medium Density	RS-5	8.4	3	Above Moderate	NO	
1817	45104113		0.15	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1818	45130114	2245 E HAMMOND AVE	0.09	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1819	45205503	1037 N GLENN AVE	0.08	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1820	45218106	807 N FERGER AVE	0.09	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1821	45220905	706 N POPLAR AVE	0.14	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1822	45221329		0.21	Residential - Medium Density	RS-5	8.4	2	Above Moderate	NO	
1823	45228203	629 N COLLEGE AVE	0.14	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1824	45314214	1450 N ARCHIE AVE	0.17	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1825	45314215	1444 N ARCHIE AVE	0.19	Residential - Medium Density	RS-5	8.4	2	Above Moderate	NO	
1826	45320114	1323 N EIGHTH AVE	0.13	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1828	45418405	761 N BOND AVE	0.09	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1829	45419302		0.07	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1830	45419310	708 N FIFTH AVE	0.09	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1831	45424411	719 N SIERRA VISTA AVE	0.18	Residential - Medium Density	RS-5	8.4	2	Above Moderate	NO	
1832	45428139	3739 E WHITE AVE	0.11	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1833	45623232		0.41	Residential - Medium Density	RS-5	8.4	3	Above Moderate	NO	
1834	45811309	409 N TEILMAN AVE	0.12	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	

Site ID	APN	Address	Size (acres)	General Plan Land Use Designation	Zoning	Assumed Density (per acre)	Units	Income Level	In 5th Cycle Housing Element?	Environmental Constraint
1835	45815103	717 W FRANKLIN AVE	0.08	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1836	45815112		0.11	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1837	45908219		0.11	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1838	45917126	378 N CLARK AVE	0.11	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1839	45911208		0.17	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1840	45914410	359 N POPLAR AVE	0.11	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1841	45918126	2630 E GRANT AVE	0.09	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1842	45918423	2717 E MC KENZIE AVE	0.11	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1843	45921238		0.12	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1844	45927102	2526 E MC KENZIE AVE	0.11	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1845	45933208	137 N EFFIE AVE	0.08	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1846	45928414	3049 E ILLINOIS AVE	0.09	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1847	45928424	219 N FIRST AVE	0.09	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1848	45936117	2971 E IOWA AVE	0.09	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1849	46002610	3353 E GRANT AVE	0.12	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1852	46022718	4406 E BALL AVE	0.15	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1853	46026205	3230 E ILLINOIS AVE	0.15	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1854	46028406	3846 E IOWA AVE	0.10	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1855	46115114	4627 E HUNTINGTON AVE	0.21	Residential - Medium Density	RS-5	8.4	2	Above Moderate	NO	
1856	46121223	4561 E BALCH AVE	0.14	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1857	46130202	548 S RECREATION AVE	0.16	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1858	46225427	4921 E TULARE AVE	0.61	Residential - Medium Density	RS-5	8.4	5	Above Moderate	NO	
1859	46327024	4960 E TULARE AVE	0.63	Residential - Medium Density	RS-5	8.4	5	Above Moderate	NO	
1860	46308201	155 S WILLOW AVE	0.43	Residential - Medium Density	RS-5	8.4	4	Above Moderate	NO	
1861	46313220	369 S WILLOW AVE	0.61	Residential - Medium Density	RS-5	8.4	5	Above Moderate	NO	
1862	46318226	5030 E BALCH AVE	0.14	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1863	46404049	1861 W WHITESBRIDGE AVE	3.01	Residential - Medium Density	RS-5	8.4	25	Above Moderate	NO	
1864	46419214	1006 W WOODWARD AVE	0.16	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1865	46517117	1122 CALAVERAS ST	0.07	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1866	46519103	30 E AMADOR ST	0.16	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1867	46519615		0.08	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1868	46521310	231 E STANISLAUS ST	0.08	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1869	46521606	1130 S TRINITY ST	0.13	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1870	46711408		0.10	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1871	46713406	127 F ST	0.09	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1872	47808338		0.08	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1873	46813208	3070 E EL MONTE WAY	0.16	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1874	47007139	751 S CEDAR AVE	0.14	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	

Site ID	APN	Address	Size (acres)	General Plan Land Use Designation	Zoning	Assumed Density (per acre)	Units	Income Level	In 5th Cycle Housing Element?	Environmental Constraint
1875	47009233		0.10	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1876	47017223	4775 E ALTA AVE	0.14	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1877	47110201	1606 S THIRD AVE	0.16	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1878	47118510	1915 S HAZELWOOD BLVD	0.15	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1879	47706005	106 W CHURCH AVE	4.29	Residential - Medium Density	RS-5	8.4	36	Above Moderate	NO	
1880	47809237		0.07	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1881	47815419	2234 S CHERRY AVE	0.05	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1882	47819106	2326 S POPPY AVE	0.14	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1883	47826110		0.14	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1884	48023526	2428 S CEDAR AVE	0.15	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1885	48035241		0.14	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1886	48035311		0.07	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1887	48711221	2641 S NINTH AVE	0.17	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1888	48712419	2681 S ELEVENTH AVE	0.12	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1889	48713003	4024 E VINE AVE	0.15	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1890	48713006	4107 E MASON AVE	0.15	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
1891	50409212T		1.74	Residential - Medium Density	RS-5	8.4	15	Above Moderate	NO	
1892	57405003		0.85	Residential - Medium Density	RS-5	8.4	7	Above Moderate	NO	
2213	57423808		8.85	Residential - Medium Density	RS-5	8.4	74	Above Moderate	NO	
2251	31008103S		15.33	Residential - Medium Density	RS-5	8.4	129	Above Moderate	NO	
2253	57907534		10.14	Residential - Medium Low Density	RS-4	4.8	49	Above Moderate	YES	
2255	57939045S		9.70	Residential - Medium Low Density	RS-4	4.8	47	Above Moderate	NO	FEMA 100-year flood zone
2256	57939062S		4.26	Residential - Medium Density	RS-5	8.4	36	Above Moderate	YES	
2257	57922049S		2.57	Residential - Urban Neighborhood	RM-2	18.0	46	Lower	NO	
2258	30316150		0.23	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
2259	30316151		0.27	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
2260	30316152		0.22	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
2261	30316153		0.15	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
2262	41808086		1.55	Regional Mixed-Use	RMX	45.0	70	Lower	YES	
2263	41808087		1.31	Regional Mixed-Use	RMX	45.0	59	Lower	YES	
2264	41808083		1.47	Regional Mixed-Use	RMX	45.0	66	Lower	YES	
2265	42517218	4819 N BLACKSTONE AVE	0.80	Corridor - Center Mixed Use	CMX	37.50	30	Lower	YES	
2267	45603038		1.10	Corridor - Center Mixed Use	CMX	37.50	41	Lower	YES	
2268	45603048		5.33	Corridor - Center Mixed Use	CMX	37.50	200	Lower	YES	
2269	31306007		0.53	Residential - Medium Density	RS-5	8.4	4	Above Moderate	YES	
2270	47403072		9.85	Corridor - Center Mixed Use	CMX	37.50	370	Lower	YES	
2271	47403078		8.46	Corridor - Center Mixed Use	CMX	37.50	317	Lower	YES	
2272	48110016		0.92	Residential - Medium Low Density	RS-4	4.8	4	Above Moderate	NO	

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2273	48149337S	2206 S MINNEWAWA AVE	0.46	Residential Low Density	RS-2	2.0	1	Above Moderate	YES	
2274	46305047		0.96	Corridor - Center Mixed Use	CMX	37.50	36	Lower	YES	
2275	46305048		1.03	Corridor - Center Mixed Use	CMX	37.50	39	Lower	YES	
2276	48102031	2108 S PEACH AVE	0.24	Residential - Medium Density	RS-5	8.4	2	Above Moderate	NO	
2277	47320038	1624 S WILLOW AVE	0.19	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
2278	47204026		0.64	Neighborhood Mixed-Use	NMX	32.0	21	Lower	YES	
2279	47204027		0.64	Neighborhood Mixed-Use	NMX	32.0	21	Lower	YES	
2280	47204028		0.64	Neighborhood Mixed-Use	NMX	32.0	21	Lower	YES	
2281	48022038	3639 E EUGENIA AVE	0.15	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
2282	48012016		1.52	Residential - Medium Density	RS-5	8.4	13	Above Moderate	YES	
2283	46130320	560 S DEARING AVE	0.21	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
2284	47106230	4140 E BUTLER AVE	0.28	Residential - Medium High Density	RM-1	13.6	4	Moderate	YES	
2286	47125307	2054 S HAZELWOOD BLVD	0.20	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
2287	47125305		0.20	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
2288	46814010	778 S HAZELWOOD BLVD	0.15	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
2289	45928426		0.37	Residential - Medium Density	RS-5	8.4	3	Above Moderate	YES	
2290	45928427	3050 E NEVADA AVE	0.13	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
2291	45426131		0.19	Residential - Medium Density	RS-5	8.4	4	Above Moderate	YES	
	46010104		0.21							
2292	45418502	3116 E THOMAS AVE	0.07	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
2293	45418512	3106 E THOMAS AVE	0.08	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
2294	45418123	726 N FIRST ST	0.11	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
2295	45405234		0.11	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
2296	45328230	1304 N EIGHTH ST	2.19	Residential - Medium Density	RS-5	8.4	18	Above Moderate	YES	
2297	44409312	2224 N SAN PABLO AVE	0.16	Residential - Medium High Density	RM-1	13.6	2	Moderate	YES	
2298	45216513		0.54	Residential - Medium High Density	RM-1	13.6	7	Moderate	YES	
2299	45223223	2203 E HARVEY AVE	0.35	Residential - Medium High Density	RM-1	13.6	5	Moderate	YES	
2300	45228217	540 N VAN NESS AVE	0.19	Commercial - Main Street	CMS	24.00	4	Above Moderate	YES	
2301	45219114		0.17	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
2302	45912218	631 E MILDREDA AVE	0.10	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
2303	43308002		3.79	Residential - Medium Density	RS-5	8.4	32	Above Moderate	YES	
2304	42628103	4235 N DELNO AVE	0.30	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	YES	
2305	40613315	6029 N SAN PEDRO AVE	0.23	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	YES	
2306	40613316	6029 N SAN PEDRO AVE	0.12	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	NO	
2309	50409221		8.70	Residential - Urban Neighborhood	RM-2	18.0	157	Lower	YES	
2310	50410411	6979 N WEBER AVE	0.13	Residential - Medium High Density	RM-1	13.6	2	Moderate	NO	
2311	50411420	7015 N WEBER AVE	0.13	Residential - Medium High Density	RM-1	13.6	2	Moderate	NO	
2312	50411421	7003 N WEBER AVE	0.13	Residential - Medium High Density	RM-1	13.6	2	Moderate	NO	

Site ID	APN	Address	Size (acres)	General Plan Land Use Designation	Zoning	Assumed Density (per acre)	Units	Income Level	In 5th Cycle Housing Element?	Environmental Constraint
2313	50411426	7001 N WEBER AVE	0.13	Residential - Medium High Density	RM-1	13.6	2	Moderate	NO	
2314	50507006S		1.37	Residential - Medium Density	RS-5	8.4	12	Above Moderate	YES	
2315	50803014	North of W Shaw Ave, south of Island Waterpark	22.38	Corridor - Center Mixed Use	CMX	37.50	151	Moderate	YES	
							50	Above Moderate		
							50	Lower		
2316	50803026	North of W Shaw Ave, south of Island Waterpark	7.23	Regional Mixed-Use	RMX	45.0	0	Moderate	NO	
							0	Above Moderate		
							98	Lower		
2317	50803005	N Lola Ave at W Shaw Ave	11.16	Regional Mixed-Use	RMX	45.0	90	Moderate	YES	
							30	Above Moderate		
							30	Lower		
2318	51011016	5819 W SHAW AVE	0.08	Residential - Urban Neighborhood	RM-2	18.0	1	Above Moderate	NO	
2319	51054029		1.79	Residential - Urban Neighborhood	RM-2	18.0	32	Lower	YES	
	51054030									
	51054028									
	51054027									
	51054031									
	51054023									
2320	51124037	3949 N PARKWAY DR	8.47	Residential - Medium High Density	RM-1	13.6	115	Moderate	YES	
2321	43303208	3114 N VALENTINE AVE	2.00	Residential - Medium High Density	RM-1	13.6	27	Moderate	NO	
2322	44202246		4.91	Residential - Medium Density	RS-5	8.4	41	Above Moderate	YES	
2323	44209048	2741 W CLINTON AVE	0.69	Neighborhood Mixed-Use	NMX	32.0	22	Lower	YES	
2324	44923129	1835 W HEDGES AVE	1.16	Neighborhood Mixed-Use	NMX	32.0	37	Lower	YES	
2325	44923135	1915 W HEDGES AVE	1.16	Neighborhood Mixed-Use	NMX	32.0	37	Lower	YES	
2326	44923134	1937 W HEDGES AVE	1.18	Neighborhood Mixed-Use	NMX	32.0	38	Lower	YES	
2327	44934109		0.23	Residential - Low Density	RS-3	3.3	1	Above Moderate	YES	
2328	44934204		0.47	Residential - Low Density	RS-3	3.3	2	Above Moderate	YES	
2329	44934205		0.23	Residential - Low Density	RS-3	3.3	1	Above Moderate	YES	
2330	45814110	303 N CHANNING WAY	0.28	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
2331	45811206	453 N DURANT WAY	0.25	Residential - Medium Density	RS-5	8.4	2	Above Moderate	NO	
2332	45813205	449 N WESLEY AVE	0.16	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
2333	45816104		0.16	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
2334	45816116	414 W NAPA AVE	0.16	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
2335	45816122	424 W NAPA AVE	0.20	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
2336	45816123	350 N FRUIT AVE	0.15	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
2337	45816124	360 N FRUIT AVE	0.16	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
2338	45816128	413 W FRANKLIN AVE	0.18	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
2339	45808034	2146 W WHITES BRIDGE AVE	1.53	Commercial - Regional	CR	40.00	61	Lower	NO	

Site ID	APN	Address	Size (acres)	General Plan Land Use Designation	Zoning	Assumed Density (per acre)	Units	Income Level	In 5th Cycle Housing Element?	Environmental Constraint
2340	46404055	850 S SEQUOIA DR	2.97	Residential - Medium Density	RS-5	8.4	25	Above Moderate	YES	
2341	46420012	824 W CALIFORNIA AVE	0.21	Residential - Medium Density	RS-5	8.4	2	Above Moderate	NO	
2343	47711304		0.93	Corridor - Center Mixed Use	CMX	37.50	35	Lower	YES	
2344	47711208		0.23	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
2345	47711210	2122 S THORNE AVE	0.14	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
2346	47711211	146 W ATCHISON ST	0.10	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
2347	47711425	221 W ATCHISON ST	0.12	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
2348	47718203	2368 S WALNUT AVE	0.41	Residential - Medium Density	RS-5	8.4	3	Above Moderate	YES	
2349	47718212		0.23	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
2350	47718219		0.30	Residential - Medium Density	RS-5	8.4	3	Above Moderate	YES	
2351	47722260	225 E JENSEN AVE	0.13	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
2352	32813103		0.07	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	NO	
2353	32813109		0.07	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	NO	
2354	32813206	2970 S HARDT AVE	0.07	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	NO	
2355	32813207		0.07	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	NO	
2356	32916145	362 W ALMY AVE	0.14	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
2357	32815044	2916 S ELM AVE	1.32	Neighborhood Mixed-Use	NMX	32.0	42	Lower	NO	
2358	32815045		0.68	Residential - Medium Density	RS-5	8.4	6	Above Moderate	NO	
2359	47917116		0.14	Corridor - Center Mixed Use	CMX	37.50	5	Above Moderate	NO	
2361	47912121		0.14	Corridor - Center Mixed Use	CMX	37.50	5	Above Moderate	NO	
2362	47912122		0.14	Corridor - Center Mixed Use	CMX	37.50	5	Above Moderate	NO	
2363	47818215		0.25	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
2364	47818319		0.65	Residential - Medium Density	RS-5	8.4	5	Above Moderate	YES	
2365	47825401		0.09	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
2366	47819130	2341 S ELM AVE	0.11	Neighborhood Mixed-Use	NMX	32.0	4	Above Moderate	NO	
2367	46713203	321 F ST	0.17	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
2368	47813425	2232 S ELM AVE	0.16	Neighborhood Mixed-Use	NMX	32.0	5	Above Moderate	YES	
2369	46730170	1029 SANTA CLARA ST	0.09	Neighborhood Mixed-Use	NMX	32.0	3	Above Moderate	NO	
2370	46730171	1027 SANTA CLARA ST	0.10	Neighborhood Mixed-Use	NMX	32.0	3	Above Moderate	NO	
2371	46717211		0.17	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
2372	46711412	916 C ST	0.29	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
2373	46711413		0.28	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
2375	46521409	27 E TUOLUMNE ST	0.08	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
2376	46521502	112 E STANISLUAS ST	0.08	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
2377	46517503		0.17	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
2378	46517212		0.17	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
2379	46517213		0.17	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
2381	46512540		0.10	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	

Site ID	APN	Address	Size (acres)	General Plan Land Use Designation	Zoning	Assumed Density (per acre)	Units	Income Level	In 5th Cycle Housing Element?	Environmental Constraint
2382	46512541		0.10	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
2383	46512542		0.10	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
2384	46512543		0.10	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
2385	46512544		0.10	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
2386	46512545		0.10	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
2387	46512546		0.18	Residential - Medium Density	RS-5	8.4	2	Above Moderate	YES	
2388	46411312	238 W LEMON AVE	0.67	Residential - Medium Density	RS-5	8.4	6	Above Moderate	YES	
2389	45822012	608 S THORNE AVE	1.38	Residential - Medium Density	RS-5	8.4	12	Above Moderate	YES	
2390	45821220	154 W EL DORADO ST	0.38	Residential - Medium Density	RS-5	8.4	3	Above Moderate	YES	
2391	45821219	152 W EL DORADO ST	0.12	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
2392	45821180		0.09	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
2393	46710306		0.22	Downtown Neighborhood	DTN	76.0	17	Above Moderate	YES	
2394	46706327		0.02	Downtown Neighborhood	DTN	76.0	1	Above Moderate	NO	
2395	46706321		0.03	Downtown Neighborhood	DTN	76.0	3	Above Moderate	NO	
2396	46707307T		0.28	Downtown Neighborhood	DTN	76.0	21	Above Moderate	YES	
2397	46827110		0.17	Downtown Neighborhood	DTN	76.0	13	Above Moderate	NO	
2398	46827121	347 L ST	0.08	Downtown Neighborhood	DTN	76.0	6	Above Moderate	NO	
2399	46823423	348 L ST	0.18	Downtown Neighborhood	DTN	76.0	13	Above Moderate	NO	
2400	45930121	146 N BROADWAY	0.12	Neighborhood Mixed-Use	NMX	32.0	4	Above Moderate	NO	
2401	45913220		0.02	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
2402	45930605	945 E DIVISADERO ST	0.11	Neighborhood Mixed-Use	NMX	32.0	3	Above Moderate	NO	
2403	45916121	1728 E GRANT AVE	0.31	Corridor - Center Mixed Use	CMX	37.50	12	Above Moderate	NO	
2404	45229316		0.09	Neighborhood Mixed-Use	NMX	32.0	3	Above Moderate	NO	
2405	45230227		0.06	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
2406	45933309	119 N DIANA ST	0.11	Neighborhood Mixed-Use	NMX	32.0	4	Above Moderate	NO	
2407	45933310	115 N DIANA ST	0.11	Neighborhood Mixed-Use	NMX	32.0	4	Above Moderate	NO	
2408	45917135		0.02	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
2409	45907403	459 N CLARK ST	0.13	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
2410	45908125		0.06	Neighborhood Mixed-Use	NMX	32.0	2	Above Moderate	NO	
2411	45927107	263 N U ST	0.12	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
2413	45613121	726 N PEACH AVE	0.21	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	NO	
2414	45613122	712 N PEACH AVE	0.11	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	NO	
2415	30307111		0.06	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
2416	30307112		0.06	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
2417	30307106	463 W MINARETS AVE	0.06	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
2418	30307107	461 W MINARETS AVE	0.06	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
2419	30307104		0.06	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
2420	40805031		0.91	Residential - Medium Density	RS-5	8.4	8	Above Moderate	NO	

Site ID	APN	Address	Size (acres)	General Plan Land Use Designation	Zoning	Assumed Density (per acre)	Units	Income Level	In 5th Cycle Housing Element?	Environmental Constraint
2421	40805034	6507 N FRESNO ST	22.28	Residential - Medium Density	RS-5	8.4	187	Above Moderate	NO	
2422	45933209	131 N EFFIE AVE	0.09	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
2423	46327025	127 S FINE AVE	1.22	Residential - Medium Density	RS-5	8.4	10	Above Moderate	NO	
2424	47706006		4.54	Residential - Medium Density	RS-5	8.4	38	Above Moderate	NO	
2460	47020227	3853 E LIBERTY AVE	0.14	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
2461	47027215		0.14	Residential - Medium Density	RS-5	8.4	1	Above Moderate	YES	
2471	46828612 46828610 46828609	702 H ST	0.60	Downtown Neighborhood	DTN	76.0	46	Lower	NO	
2472	47902043 47902044	2434 S ELM AVE	6.73	Corridor - Center Mixed Use	CMX	37.5	253	Lower	NO	
2474	45230604	2040 E WHITE AVE	0.17	Residential - Medium Density	RS-5	8.4	1	Above Moderate	NO	
2475	31310124		2.96	Commercial - Regional	CR		240	Moderate	NO	
2476	40303051	E SHEPHERD AVE AND N CHANCE AVE	2.77	Residential - Urban Neighborhood	RM-2	18	50	Lower	YES	
2477	50020027S 50020028S 50020029S	W HERNDON AVE AND N PROSPECT AVE	3.78	Residential - Urban Neighborhood	RM-2	18	68	Lower	YES	
2482	43011050	4527 E ALAMOS AVE	0.40	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	YES	
2483	43009043		0.37	Residential - Medium Low Density	RS-4	4.8	1	Above Moderate	YES	
						Total	**22,232**			

Source: City of Fresno, Ascent, 2024.

Table 1E-7.2: Capacity on Underutilized Non-Vacant Sites, City of Fresno, September 2024

Site ID	APN	Address	Size (acres)	General Plan Land Use Designation	Zoning	Max Density (per acre)	Assumed Density (per acre)	Development Likelihood	Lower-Income Units	Moderate-Income Units	Above-Moderate Income Units	Total	In 5th Cycle Housing Element?	Environmental Constraint	Existing Use	Non-Vacant Site Category
21	57939019S	2254 E Copper Cl	12.86	Residential - Medium Density	RS-5	12	8	100%			108	108	NO		Split zoned parcel. House on portion of parcel. Agriculture.	A
22	57939019S	2254 E Copper Cl	6.27	Residential - Medium High Density	RM-1	16	13.6	100%		85		85	NO		Split zoned parcel. Agriculture.	A
115	40710207	6353 N Blackstone Ave	0.49	Corridor - Center Mixed Use	CMX	75	38	100%			18	18	NO		Surface parking lot	E
116	40914048		0.36	Corridor - Center Mixed Use	CMX	75	38	100%			10	10	YES		Access constraints	C
117	40915051		1.71	Corridor - Center Mixed Use	CMX	75	38	100%	64			64	YES		Church parking lot	E
123	41845013		0.92	Regional Mixed-Use	RMX	90	45	100%	41			41	YES		Parking lot, Racetrack.	E
127	41734223	20 W Shaw Ave	10.65	Regional Mixed-Use	RMX	90	45	100%	57	172	57	286	YES		Some vacant land within parcel; assortment of existing uses	D
155	42710137	4724 N Blackstone Ave	1.77	Corridor - Center Mixed Use	CMX	75	38	100%	67			67	NO		Small Building; Large surface parking/paved area	D
156	42710117		0.99	Corridor - Center Mixed Use	CMX	75	38	100%	37			37	NO		Paved	C
157	42717125	4678 N Blackstone Ave	4.25	Corridor - Center Mixed Use	CMX	75	38	100%	159			159	NO		Over half of parcel is vacant	D
158	42533209	4631 N Blackstone Ave	0.75	Corridor - Center Mixed Use	CMX	75	38	100%	28			28	NO		Back half parcel is vacant	D
159	42609216	4549 N Blackstone Ave	1.16	Corridor - Center Mixed Use	CMX	75	38	100%	44			44	NO		Back half parcel is vacant	D
268	44503122	3034 N Blackstone Ave	0.65	Neighborhood Mixed-Use	NMX	64	32	100%	21			21	NO		Paved	D
306	31324054		1.42	Corridor - Center Mixed Use	CMX	75	38	100%	53			53	NO		Half of parcel is parking lot	E
311	47403075	5698 E Kings Canyon Rd	0.33	Corridor - Center Mixed Use	CMX	75	38	100%			12	12	YES		Paved	C
312	47403054	5674 E Kings Canyon Rd	2.83	Corridor - Center Mixed Use	CMX	75	38	100%	106			106	YES		Some of parcel paved	E
387	31602201	2149 S Clovis Ave	10.32	Residential - Medium Low Density	RS-4	6	4.8	100%			50	50	YES		Residence on parcel	B
415	46306017	525 S Peach Ave	2.42	Corridor - Center Mixed Use	CMX	75	38	100%	91			91	YES		Portion is paved parking	E
425	48112003	2534 S Peach Ave	19.50	Residential - Medium Density	RS-5	12	8	100%			164	164	YES		Residence and Agriculture	A
429	48111020		2.65	Residential - Medium High Density	RM-1	16	13.6	100%		36		36	YES	FEMA 100-year flood zone	Agricultural structures on half of parcel	A
449	48008005	2200 S Chestnut Ave	17.85	Residential - Medium Density	RS-5	12	8	100%			150	150	YES		Residence, Agriculture	A

Site ID	APN	Address	Size (acres)	General Plan Land Use Designation	Zoning	Max Density (per acre)	Assumed Density (per acre)	Development Likelihood	Lower-Income Units	Moderate-Income Units	Above-Moderate Income Units	Total	In 5th Cycle Housing Element?	Environmental Constraint	Existing Use	Non-Vacant Site Category
466	46130321	4741 E Kings Canyon Rd	0.55	Corridor - Center Mixed Use	CMX	75	38	100%	21			21	NO		Paved parking, vacant pad	C
480	45424103	774 N Maple Ave	2.12	Neighborhood Mixed-Use	NMX	64	32	100%	68			68	YES		Paved	C
508	45423205	4582 E Harvey Ave	8.15	Neighborhood Mixed-Use	NMX	64	32	100%	261			261	NO		Paved, but most of parcel is vacant, building in corner	C
512	45431401	4555 E Belmont Ave	0.69	Neighborhood Mixed-Use	NMX	64	32	100%	22			22	NO		half of parcel is vacant	D
513	46007227	4584 E Belmont Ave	0.23	Neighborhood Mixed-Use	NMX	64	32	100%			7	7	YES		paved	C
516	46006203		0.12	Neighborhood Mixed-Use	NMX	64	32	100%			4	4	YES		Paved, car storage	D
569	46027409	3449 E Tulare St	0.60	Neighborhood Mixed-Use	NMX	64	32	100%	19			19	YES		Half of parcel vacant	D
601	45426213	3217 E Belmont Ave	0.05	Neighborhood Mixed-Use	NMX	64	32	100%			2	2	NO		Portion paved	C
630	44518119	2736 N Blackstone Ave	0.55	Neighborhood Mixed-Use	NMX	64	32	100%	18			18	NO		Surface parking	E
650	45222415	735 N Abby St	0.24	Neighborhood Mixed-Use	NMX	64	32	100%			8	8	YES		Portion paved	C
653	45214117	902 N Blackstone Ave	0.30	Neighborhood Mixed-Use	NMX	64	32	100%			10	10	YES		Paved	C
657	45129632	1206 N Effie St	1.01	Neighborhood Mixed-Use	NMX	64	32	100%	32			32	NO	FEMA 100-year flood zone	Paved	C
659	45113515	1407 N Blackstone Ave	1.02	Neighborhood Mixed-Use	NMX	64	32	100%	33			33	NO		Portion of parcel is vacant	D
671	45211510	958 N Fulton St	0.51	Commercial - Main Street	CMS	48	24	100%	12			12	NO		Part of parcel is vacant	D
673	45204103	1145 N Van Ness Ave	0.23	Commercial - Main Street	CMS	48	24	100%			6	6	NO		Paved Parking	E
675	45126404	849 E Fern Ave	0.41	Commercial - Main Street	CMS	48	24	100%			10	10	NO		Part of parcel is vacant	D
677	45126315		0.14	Residential - Urban Neighborhood	RM-2	30	18	100%			2	2	NO		Paved	C
686	45903304	540 E Belmont Ave	0.14	Commercial - Main Street	CMS	48	24	100%			3	3	YES		Paved, poor condition overgrown	C
703	45020302	108 E Olive Ave	0.32	Commercial - Main Street	CMS	48	24	100%			8	8	NO		Half of parcel vacant	D
705	45020224	48 E Olive Ave	0.28	Commercial - Main Street	CMS	48	24	100%			7	7	NO		Paved	C
723	43323003	1783 W Dakota Ave	1.15	Residential - Medium High Density	RM-1	16	13.6	100%		16		16	YES		Old cement pads	C
737	42402202	3503 W Shaw Ave	9.55	Regional Mixed-Use	RMX	90	45	100%	430			430	YES	FEMA 100-year flood zone	Large portion of parcel is vacant	D
738	41504449		1.23	Regional Mixed-Use	RMX	90	45	100%	55			55	YES		Parking lot; vacant portion	E
739	41504441	3440 W Shaw Ave	0.84	Regional Mixed-Use	RMX	90	45	100%	38			38	YES		Some vacant	D
741	41504445	3770 W Shaw Ave	2.45	Regional Mixed-Use	RMX	90	45	100%	110			110	YES		Parking, vacant pads	E
808	50508029S		11.92	Residential - Urban Neighborhood	RM-2	30	18	100%	214			214	YES		Agriculture	A
821	50506007	5326 N Grantland Ave	28.65	Regional Mixed-Use	RMX	90	45	50%	77	232	7	386	YES		Agriculture	A
822	50506033	North of W Shaw Ave and N Bryan Ave intersection	2.30	Corridor - Center Mixed Use	CMX	75	38	50%	26			26	NO		Agriculture	A
823	50506020	6824 W Shaw Ave	2.84	Regional Mixed-Use	RMX	90	45	50%	38			38	YES		Residence and Trucking	D

Site ID	APN	Address	Size (acres)	General Plan Land Use Designation	Zoning	Max Density (per acre)	Assumed Density (per acre)	Development Likelihood	Lower-Income Units	Moderate-Income Units	Above-Moderate Income Units	Total	In 5th Cycle Housing Element?	Environmental Constraint	Existing Use	Non-Vacant Site Category
824	50506019	6730 W Shaw Ave	16.52	Regional Mixed-Use	RMX	90	45	50%	45	134	45	224	YES		Residence and Agriculture. Not used for ag in many years. Now new APN. Part of this land is under construction for on/off ramp to Veterans Blvd	B
825	50506016S	W Shaw Ave east of N Grantland Ave	14.93	Regional Mixed-Use	RMX	90	45	50%	40	121	40	201	YES		Agriculture; split zoned parcel	A
829	50803027	N Island Waterpark Dr	3.62	Regional Mixed-Use	RMX	90	45	50%	49			49	YES		Agriculture; split zoned parcel	A
852	51203205	4935 N Hayes Ave	4.02	Residential - Urban Neighborhood	RM-2	30	18	100%	72			72	NO		Agriculture	A
853	51203203	6277 W Shaw Ave	19.23	Residential High Density	RM-3	45	34	100%	130	389	130	649	NO		Agriculture; Canal through middle of parcel.	A
854	51203202	6435 W Shaw Ave	8.77	Residential High Density	RM-3	45	34	100%	296			296	NO		Agriculture	A
860	51021004		4.72	Residential - Urban Neighborhood	RM-2	30	18	100%	85			85	YES		Agriculture	A
977	51202150S		18.69	Residential - Medium Density	RS-5	12	8	100%			157	157	NO		Agriculture; Split zoning, removed NV	A
978	51202126	4445 N Grantland Ave	126.76	Residential - Medium Density	RS-5	12	8	100%			1,065	1,065	YES		Agriculture; Split zoning, removed CC	A
979	51204317S		22.57	Residential - Urban Neighborhood	RM-2	30	18	100%	81	244	81	406	YES		Agriculture; Split zoned parcel	A
980	51204319		4.95	Residential - Urban Neighborhood	RM-2	30	18	100%	89			89	YES		Agriculture; Split zoned parcel	A
981	51204312S		19.12	Residential - Medium Density	RS-5	12	8	100%			161	161	YES		Agriculture	A
982	51204319		4.62	Residential - Medium Density	RS-5	12	8	100%			39	39	YES		Agriculture; Split zoned parcel	A
983	51204329T		19.11	Residential - Medium Density	RS-5	12	8	50%			80	80	YES		Agriculture	A
984	51204324		4.78	Residential - Medium Density	RS-5	12	8	100%			40	40	YES		Agriculture	A
985	51204323	3361 N Grantland Ave	28.69	Residential - Medium Density	RS-5	12	8	100%			241	241	YES		Agriculture	A
986	51204326		40.94	Residential - Medium Density	RS-5	12	8	100%			344	344	YES		Agriculture; Split zoned	A
1026	44202243	3119 W Clinton Ave	9.63	Residential - Medium Density	RS-5	12	8	100%			81	81	YES		Single residence on corner of parcel; Canal through middle of site	B
1040	44923118	1718 W Olive Ave	0.71	Neighborhood Mixed-Use	NMX	64	32	100%	23			23	YES		Northern portion of parcel is vacant	D
1042	44926040	1915 W Olive Ave	2.08	Neighborhood Mixed-Use	NMX	64	32	100%	67			67	NO		Part of parcel is vacant	D
1047	44927050	1015 N West Ave	0.93	Neighborhood Mixed-Use	NMX	64	32	100%	30			30	NO		Residence on portion of parcel (fenced off); rest of parcel vacant	B
1057	44934201	1411 W Thomas Ave	0.27	Residential - Low Density	RS-3	4	3	100%			1	1	YES		Portion paved	C
1064	45811318	919 W Belmont Ave	0.45	Neighborhood Mixed-Use	NMX	64	32	100%			14	14	NO		Half of parcel is vacant; residences on parcel separated by fence	B

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1076	32610076	3555 W Whites Bridge Ave	18.38	Residential - Urban Neighborhood	RM-2	30	18	100%	66	199	66	331	NO		Agriculture	A
1077	32610055		13.22	Residential - Medium Low Density	RS-4	6	4.8	100%			63	63	YES		Agriculture	A
1079	32610022	3209 W Whites Bridge Ave	9.57	Residential - Urban Neighborhood	RM-2	30	18	100%	172			172	YES		Agriculture	A
1080	32610027		9.51	Residential - Medium Low Density	RS-4	6	4.8	100%			46	46	YES		Agriculture	A
1084	46402008	2119 W Whites Bridge Ave	1.11	Residential - Medium Low Density	RS-4	6	4.8	100%			5	689	YES		Agriculture	A
	46402009		1.59	Residential - Medium Low Density	RS-4	6	4.8	100%			8					A
	46402035		1.76	Residential - Medium Low Density	RS-4	6	4.8	100%			8					A
	46402037	2745 W Whites Bridge Ave	4.55	Residential - Medium Low Density	RS-4	6	4.8	100%			22					A
	46402012	1106 S Hughes Ave	4.69	Residential - Medium Low Density	RS-4	6	4.8	100%			23					A
	46402034	2531 W Whites Bridge Ave	4.69	Residential - Medium Low Density	RS-4	6	4.8	100%			23					A
	46402013		4.92	Residential - Medium Low Density	RS-4	6	4.8	100%			24					A
	46402026		5.83	Residential - Medium Low Density	RS-4	6	4.8	100%			28					A
	46402028	2840 W Kearney Blvd	7.80	Residential - Medium Low Density	RS-4	6	4.8	100%			37					A
	46402036		9.31	Residential - Medium Low Density	RS-4	6	4.8	100%			45					A
	46402019	118 S Marks Ave	9.38	Residential - Medium Low Density	RS-4	6	4.8	100%			45					A
	46402031	2504 W Kearney Blvd	9.49	Residential - Medium Low Density	RS-4	6	4.8	100%			46					A
	46402029	2810 W Kearney Blvd	9.49	Residential - Medium Low Density	RS-4	6	4.8	100%			46					A
	46402030	2510 W Kearney Blvd	9.50	Residential - Medium Low Density	RS-4	6	4.8	100%			46					A
	46402007	700 S Hughes Ave	10.83	Residential - Medium Low Density	RS-4	6	4.8	100%			52					A
	46402015	842 S Hughes Ave	18.34	Residential - Medium Low Density	RS-4	6	4.8	100%			88					A
	46402025		24.72	Residential - Medium Low Density	RS-4	6	4.8	100%			119			FEMA 100-year flood zone		A
1106	46406015	2845 W Kearney Blvd	17.22	Residential - Medium Low Density	RS-4	6	4.8	100%			83	83	YES		Agriculture	A

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1107	46406013	604 S Marks Ave	13.07	Residential - Medium Low Density	RS-4	6	4.8	100%			63	63	YES	FEMA 100-year flood zone	Multi-part parcel, this only includes Agriculture, not house	A
1108	46406017	2448 W California Ave	30.77	Residential - Medium Low Density	RS-4	6	4.8	100%			148	148	YES	FEMA 100-year flood zone	Agriculture; Multi-part parcel	A
1109	46406017	2448 W California Ave	2.71	Residential - Medium Low Density	RS-4	6	4.8	100%			13	13	YES	FEMA 100-year flood zone	Agriculture; Multi-part parcel	A
1110	46406017	2448 W California Ave	17.06	Residential - Medium Low Density	RS-4	6	4.8	100%			82	82	YES		Agriculture; Multi-part parcel	A
1111	46406017	2448 W California Ave	16.75	Residential - Medium Low Density	RS-4	6	4.8	100%			80	80	YES		Agriculture; Multi-part parcel	A
1112	46407010		9.05	Residential - Medium Low Density	RS-4	6	4.8	100%			43	43	YES		Agriculture	A
1118	47702118	2388 W Church Ave	1.24	Residential - Medium Low Density	RS-4	6	4.8	100%			6	261	NO		Agriculture	A
	47702125		7.06	Residential - Medium Low Density	RS-4	6	4.8	100%			34		YES		Agriculture	A
	47702111	2184 S Hughes Ave	9.32	Residential - Medium Low Density	RS-4	6	4.8	100%			45		YES		Agriculture	A
	47702119	2404 W Church Ave	17.07	Residential - Medium Low Density	RS-4	6	4.8	100%			82		YES		Agriculture	A
	47702109	2449 W California Ave	19.55	Residential - Medium Low Density	RS-4	6	4.8	100%			94		YES		Agriculture	A
	47702120	2550 W Church Ave	34.23	Residential - Medium Low Density	RS-4	6	4.8	100%			164	164	YES		Agriculture	A
1119	47702114	2394 S Hughes Ave	20.98	Residential - Medium Low Density	RS-4	6	4.8	100%			101	101	YES		Residence; Agriculture	A
1186	47703029S	633 W Church Ave	18.62	Residential - Medium Density	RS-5	12	8	100%			156	156	NO		Agriculture	A
1187	47703015		14.85	Residential - Medium Density	RS-5	12	8	100%			125	125	YES		Agriculture	A
1189	47703004		19.35	Residential - Medium Density	RS-5	12	8	100%			163	163	YES		Agriculture	A
1190	47703028	194 W Church Fr	19.60	Residential - Medium Density	RS-5	12	8	100%			188	188	YES		Agriculture	A
1223	32808001S	2867 S Walnut Ave	18.80	Residential - Urban Neighborhood	RM-2	30	18	100%	68	203	68	339	YES		Agriculture	A
1224	32808009	2911 S Walnut Ave	6.66	Residential - Medium Low Density	RS-4	6	4.8	100%			32	32	YES		Agriculture	A
1225	32808002		19.69	Residential - Medium Density	RS-5	12	8	100%			165	165	YES		Agriculture	A
1226	32808003		14.53	Residential - Medium Density	RS-5	12	8	100%			122	122	YES		Agriculture; Parcel with split zoning	A
1227	32808003		5.16	Open Space - Community Park	RM-1	16	13.6	100%		70		70	NO		Agriculture; Parcel with split zoning	A

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1289	47921116	2593 S Elm Ave	0.27	Corridor - Center Mixed Use	CMX	75	38	100%			10	10	NO		Vacant/Run-down building	D
1293	47912127	2493 S Elm Ave	0.27	Corridor - Center Mixed Use	CMX	75	38	100%			10	10	NO		Vacant/Rundown building	D
1412	46715418		0.17	Residential - Medium Density	RS-5	12	8	100%			1	1	YES		Paved	C
1493	46706203T	1141 G St	0.26	Downtown Neighborhood	DTN	N/A	76	100%			20	20	YES		Parking	E
1494	46706206	1115 G St	0.00	Downtown Neighborhood	DTN	N/A	76	100%	46			46	YES		Vacant/rundown feed supply	D
	46706207		0.00													
	46706205	1121 G St	0.60													
1495	46710202	1133 E St	0.34	Downtown Neighborhood	DTN	N/A	76	100%			26	26	YES		Paved	C
1497	46706606	1010 E St	0.86	Downtown Neighborhood	DTN	N/A	76	100%	66			66	YES		Vacant building; parking lot; vacant land	D
1499	46706604	1025 F St	0.17	Downtown Neighborhood	DTN	N/A	76	100%			13	13	YES		Paved	C
1501	46706615	1061 F St	0.22	Downtown Neighborhood	DTN	N/A	76	100%			16	16	YES		Paved	C
1523	46707410T	930 E St	0.35	Downtown Neighborhood	DTN	N/A	76	100%			26	26	YES		Parking Lot	E
1525	46707115	935 China Alley	0.17	Downtown Neighborhood	DTN	N/A	76	100%	71			71	NO		Abandoned building falling apart	D
	46707120		0.60													
1532	46708116T	655 G St	0.35	Downtown Neighborhood	DTN	N/A	76	100%			26	26	YES		Paved	C
1561	46705017S	501 H St	1.62	Downtown Neighborhood	DTN	N/A	76	100%	123			123	YES		Paved	C
1564	46829507	507 Broadway	0.43	Downtown Neighborhood	DTN	N/A	76	100%			33	33	YES		Parking/paved	E
	46829503															
1566	46829207	1920 Ventura St	0.42	Downtown Neighborhood	DTN	N/A	76	100%	66			66	YES		Warehouse/paved	D
	46829206	534 Broadway														
1567	46829204	1929 Santa Clara St	0.24	Downtown Neighborhood	DTN	N/A	76	100%			18	18	YES		Paved; Business on small portion	D
1570	46826519	2010 Ventura St	1.10	Downtown Neighborhood	DTN	N/A	76	100%	83			83	YES		Parking	E
1579	46819534T	2402 Ventura St	0.73	Downtown General	DTG	N/A	83	100%	61			61	YES		Only counting vacant part of parcel	C
1582	46819237	534 O St	0.24	Downtown General	DTG	N/A	83	100%		20		20	YES		Paved	C
	46819236	530 O St														
1585	46811417	662 R St	0.51	Downtown Neighborhood	DTN-AH	N/A	32	100%	16			16	YES		Vacant building	D
1587	46816101	2748 Tulare St	0.34	Downtown General	DTG	N/A	83	100%			28	28	YES		Parking lot	E
1591	46840054T		2.87	Downtown General	DTG	N/A	83	100%	238			238	YES		Parking lot	E
1596	46826414	2026 Mono St	0.52	Downtown General	DTG	N/A	83	100%	43			43	YES		Parking lot	E
1598	46826413S	625 Van Ness Ave	0.60	Downtown General	DTG	N/A	83	100%	50			50	YES		Parking lot	E
1600	46829115	643 Fulton St	0.26	Downtown Neighborhood	DTN	N/A	76	100%			20	20	YES		Paved	C
1601	46828606	715 Broadway	0.43	Downtown Neighborhood	DTN	N/A	80	100%			33	33	YES		Paved; Vacant building	D
1603	46828608	704 H ST	0.60	Downtown Neighborhood	DTN	N/A	80	100%	46			46	YES		Vacant, rundown buildings	D
1606	46621522T	1822 Fresno St	2.78	Downtown Core	DTC	N/A	90	100%	250			250	YES		Parking lot; HSR MP	E

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1607	46621426T		0.32	Downtown Core	DTC	N/A	90	100%	70			70	YES		Parking lot; HSR MP	E
	46621427T		0.46													
1609	46620654		0.69	Downtown Core	DTC	N/A	90	100%	62			62	YES		Parking lot	E
1610	46703039ST	1705 Fresno St	2.25	Downtown Core	DTC	N/A	90	100%	202			202	YES		Dairy Semi-truck Parking; Consolidation potential, need ownership; HSR MP	E
1612	46504038ST	1301 H St	2.98	Downtown Core	DTC	N/A	90	100%	268			268	YES		Small building on site	D
1615	46620650T	1900 Tuolumne St	1.32	Downtown Core	DTC	N/A	90	100%		56	56	112	YES		Parking lot (IRS building). IIGC Site HD5; on this site is proposed Market 1.	E
	46620651T		0.06													
1617	46615318	2000 Tuolumne St	0.65	Downtown Core	DTC	N/A	90	100%	139			139	YES		The Business Journal Parking lot. IIGC Site HD1 and HD3. HD1 is planned for student housing and HD3 is planned to receive LIHTC funding.	E
	ROW		0.05													
	46615314		0.55													
1618	46615315	1315 Van Ness Ave	0.52	Downtown Core	DTC	N/A	90	100%		50	50	100	YES		CVS Parking lot. IIGC Site HD6; on this is proposed Market 2.	E
	ROW		0.34													
1622	46608313T		0.43	Downtown Neighborhood	DTN	N/A	76	100%			33	33	YES		Parking lot	E
1623	46608319T	1357 O St	0.43	Downtown Neighborhood	DTN	N/A	76	100%			33	33	YES		Parking lot	E
1624	46608121	1320 O St	0.52	Downtown Neighborhood	DTN	N/A	76	100%	39			39	YES		Parking lot	E
1646	46619602	1635 Broadway	0.35	Downtown Neighborhood	DTN	N/A	76	100%			27	27	YES		Parking lot	E
1647	46619204	1704 Broadway	0.16	Downtown Neighborhood	DTN	N/A	76	100%			12	12	YES		Parking lot	E
1649	46619207		0.16	Downtown Neighborhood	DTN	N/A	76	100%			12	12	YES		Parking lot	E
1652	46613402	1753 Van Ness Ave	0.13	Downtown Neighborhood	DTN	N/A	76	100%			10	10	YES		Small commercial buildings	D
1655	46613124	1118 E Divisadero St	0.32	Downtown Neighborhood	DTN	N/A	76	100%			24	24	YES		Portion is parking lot	E
1657	46613333	946 E Divisadero St	0.25	Downtown Neighborhood	DTN	N/A	76	100%			19	19	YES		Paved and vacant business	D
1659	46618315	2013 Broadway	0.42	Downtown Neighborhood	DTN	N/A	76	100%			32	32	YES		Parking and Business	E
1660	46502002	510 E Divisadero St	0.79	Downtown Neighborhood	DTN	N/A	76	100%	60			60	YES		Paved (poor condition)	C
1680	45933139	149 N Abby St	0.63	Corridor - Center Mixed Use	CMX	75	38	100%	24			24	NO		Parking lot	E
1681	45925127	231 N Abby St	0.28	Corridor - Center Mixed Use	CMX	75	38	100%			10	10	NO		Parking lot	E
1683	45916125	333 N Abby St	0.16	Corridor - Center Mixed Use	CMX	75	38	100%			6	6	NO		Multi-part parcel: this piece paved/vacant	C

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1684	45916125	333 N Abby St	0.48	Corridor - Center Mixed Use	CMX	75	38	100%			18	18	NO		Multi-part parcel; restaurant and parking lot	D
1687	45907105	453 N Abby St	0.16	Corridor - Center Mixed Use	CMX	75	38	100%			6	6	NO		Paved	E
1691	45229434		0.11	Residential - Medium Density	RS-5	12	8	100%			1	1	NO		Paved	C
1726	45909104	2542 E Belmont Ave	0.10	Neighborhood Mixed-Use	NMX	64	32	100%			3	3	NO		Paved pad	C
1727	45909109	2636 E Belmont Ave	0.15	Neighborhood Mixed-Use	NMX	64	32	100%			5	5	NO		Half of parcel vacant	D
1732	45927120		0.13	Neighborhood Mixed-Use	NMX	64	32	100%			4	4	YES		Paved, poor condition	C
1733	45927128	230 N Fresno St	0.14	Neighborhood Mixed-Use	NMX	64	32	100%			4	4	YES		Paved	C
1740	46606611S	2710 Fresno St	1.10	Downtown Neighborhood	DTN	N/A	76	100%	84			84	YES		Parking lot	E
2428	45426214	3211 E Belmont Ave	0.09	Neighborhood Mixed-Use	NMX	64	32	100%			3	3	NO		Portion paved	C
2429	45126316		0.11	Residential - Urban Neighborhood	RM-2	30	18	100%			2	2	NO		Paved	C
2430	50506041	6556 W Shaw Ave	2.31	Corridor - Center Mixed Use	CMX	75	38	50%	26			27	NO		Agriculture	A
2431	50506042	W Shaw Ave north of intersection with N Bryan Ave	2.12	Corridor - Center Mixed Use	CMX	75	38	50%	24			24	NO		Agriculture	A
2432	50506043	6518 W Shaw Ave	11.00	Corridor - Center Mixed Use	CMX	75	38	50%	124			124	NO		Agriculture; Residence.	A
2433	50506036	North of W Shaw Ave & N Grantland Ave intersection	2.34	Regional Mixed-Use	RMX	90	45	50%	32			32	YES		Agriculture	A
2434	50506037	6972 W Shaw Ave	3.93	Regional Mixed-Use	RMX	90	45	50%	53			53	YES		Agriculture; Farm Stand	A
2435	50506038	East of 6972 W Shaw Ave	2.30	Regional Mixed-Use	RMX	90	45	50%	31			32	YES		Agriculture	A
2436	50506034	North of W Shaw Ave & N Bryan Ave	2.30	Corridor - Center Mixed Use	CMX	75	38	50%	26			26	NO		Agriculture	A
2437	50506017	6392 W Shaw Ave	20.31	Corridor - Center Mixed Use	CMX	75	38	50%	46	137	46	229	YES		Agriculture	A
2438	50506039	West of 6150 W Shaw Ave	0.85	Corridor - Center Mixed Use	CMX	75	38	50%	10			10	YES		Agriculture	A
2439	50506040	6150 W Shaw Ave	14.31	Corridor - Center Mixed Use	CMX	75	38	50%	32	97	32	161	YES		Agriculture	A
2440	50506016S	W Shaw Ave east of N Grantland Ave	4.20	Corridor - Center Mixed Use	CMX	75	38	50%	9	28	9	46	NO		Agriculture; split zoned parcel	A

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2441	51204318		4.96	Residential - Urban Neighborhood	RM-2	30	18	100%	89			89	YES		Agriculture; Split zoned parcel	A
2442	51204320		4.94	Public Facility - Elementary School	RM-2	30	18	100%	89			89	NO		Agriculture; Split zoned parcel	A
2443	51204321		4.92	Public Facility - Elementary School	RM-2	30	18	100%	89			103	NO		Agriculture; Split zoned parcel	A
2444	51204322		4.91	Public Facility - Elementary School	RM-2	30	18	100%	88			103	NO		Agriculture; Split zoned parcel	A
2445	51204313S		19.13	Residential - Medium Density	RS-5	12	8	100%			161	161	YES		Agriculture	A
2446	51204314		19.14	Residential - Medium Density	RS-5	12	8	100%			161	161	YES		Agriculture; Canal through parcel	A
2447	51204315		9.57	Residential - Medium Density	RS-5	12	8	100%			80	80	YES		Agriculture; Canal through parcel	A
2448	51204316		9.57	Residential - Medium Density	RS-5	12	8	100%			80	80	YES		Agriculture; Canal through parcel	A
2449	51204317S		5.79	Residential - Medium Density	RS-5	12	8	100%			49	49	YES		Agriculture; Split zoned parcel	A
2450	51204318		4.61	Residential - Medium Density	RS-5	12	8	100%			39	39	YES		Agriculture; Split zones parcel	A
2451	51204320		4.63	Residential - Medium Density	RS-5	12	8	100%			39	39	YES		Agriculture; Split zoned parcel	A
2452	51204321		4.64	Residential - Medium Density	RS-5	12	8	100%			39	39	YES		Agriculture; Split zoned parcel	A
2453	51204322		4.65	Residential - Medium Density	RS-5	12	8	100%			39	39	YES		Agriculture; Split zoned parcel	A
2454	51204325		4.78	Residential - Medium Density	RS-5	12	8	100%			40	40	YES		Agriculture	A
2455	51204328		12.82	Residential - Medium Density	RS-5	12	8	100%			108	108	YES		Agriculture; Cut out basin on parcel	A
2456	32610067	3338 W Madison Ave	4.98	Residential - Medium Low Density	RS-4	6	4.8	100%			24	24	YES		Agriculture	A
2457	32610069	3240 W Madison Ave	32.75	Residential - Medium Low Density	RS-4	6	4.8	100%			157	157	YES		Agriculture	A
2458	46407011	2041 W Kearney Blvd	9.05	Residential - Medium Low Density	RS-4	6	4.8	100%			43	43	YES		Agriculture	A
2463	45229435		0.07	Residential - Medium Density	RS-5	12	8	100%			1	1	YES		Paved	C
2464	46613403	1747 Van Ness Ave	0.13	Downtown Neighborhood	DTN	N/A	80	100%			10	10	YES		Small commercial buildings	D
2465	46619211	1750 Broadway	0.29	Downtown Neighborhood	DTN	N/A	80	100%			22	22	YES		Parking lot	E
2466	46619205	1710 Broadway	0.24	Downtown Neighborhood	DTN	N/A	80	100%			18	18	YES		Parking lot	D

Site ID	APN	Address	Size (acres)	General Plan Land Use Designation	Zoning	Max Density (per acre)	Assumed Density (per acre)	Development Likelihood	Lower-Income Units	Moderate-Income Units	Above-Moderate Income Units	Total	In 5th Cycle Housing Element?	Environmental Constraint	Existing Use	Non-Vacant Site Category
2473	46620656T	1976 TUOLUMNE ST	1.40	Downtown Core	DTC	N/A	90	100%	117			117	YES		Parking lot for IRS building. Housing Authority owned site. Assumed that IRS building will remain. IIGC HD2 and HD4; HD2 is planned for student housing and HD4 is planned to receive LIHTC funds.	E
2478	31020103	3518 N Fowler	58.05	Residential - Urban Neighborhood	RM-2	30	18	100%	68	122	68	258	YES		Residential/Agriculture. Previous developer interest in site for private gated multi-family townhouse community of 145 units (Sterling Townhomes).	D
2479	47902039	2410 S Elm	0.36	Corridor - Center Mixed Use	CMX	75	38	100%			14	14	NO		Car Wash. Previous developer interest in site for horizontal mixed-use project of 190 market-rate studio, one-, two-, and three-bedroom apartment units (Elm Avenue Living).	D
2480	24705133	4914 N Blackstone	3.30	Corridor - Center Mixed Use	CMX	75	38	100%	124			124	NO			D
2481	44902013	2809 W McKinley	0.80	Rural Residential	NMX	64	32	100%	25			25	NO		Existing residential	B
2484	46704023ST 46704020S	H ST & MONO ST	0.55 1.92	Downtown Core	DTC	N/A	90	100%	100	97	97	294			Recently demolished building on the parcel owned by the City. The other parcel is privately-owned owned by Fresno Sports and Events Partners Inc	E
2485	46707402	937 F ST	0.33	Downtown Neighborhood	DTN	N/A	76	100%	30			30			Existing commercial buildings	D
2486	44502013T	3374 E SHIELDS	2.8	Office	O	N/A	N/A	N/A	224			224	No		Vacant Building: Dept of Water Resources	D
								Total	**7,035**	**2,488**	**8,127**	**17,650**				

A= Agricultural uses planned for residential. B= Largely vacant residential land. C= Mostly vacant land with paving or minor improvements. D= Existing non-residential uses on large lots with infill potential. E= Parking lots.

Source: City of Fresno and Ascent, 2024.

SECTION 1E-8: PUBLIC COMMENTS RECEIVED ON THE HOUSING ELEMENT

November 19, 2024

Mayor Jerry Dyer
Fresno City Councilmembers
Michelle Zumwalt, Planning and Development Department
2600 Fresno Street, Room Fresno, CA 93721

RE: City of Fresno Draft 6th Cycle Housing Element Errata

Sent via email: housingelement@fresno.gov

Dear Mayor Dyer, Councilmember, and Ms. Zumwalt:

Leadership Counsel for Justice and Accountability ("LCJA") and Public Interest Law Project ("PILP") submit this comment letter in response to the City of Fresno's Housing Element Draft Errata ("Errata") released on November 12, 2024. Thank you for taking the time to meet and discuss our concerns regarding the programs and their lack of affirmative furthering fair housing. We hope that this conversation, along with California's Department of Housing and Community Development (HCD) findings letter released on October 7, 2024, leads to amendments of strong policies and programs identified by R/ECAP communities. The Errata does not adequately respond to HCD's findings and fails to incorporate programs with meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics.

I. Releasing "Erratas" Without Meaningful Opportunities for Input Fails to Demonstrate Diligent Effort to Include Public Participation from R/ECAP Communities.

Every City of Fresno resident deserves the opportunity to engage in the Housing Element process and voice their concerns with revised drafts and elevate their housing needs. The City of Fresno released a revised Housing Element Draft on July 31, 2024. Since then the City has been releasing "Erratas" every month with only seven calendar days for comments: September 23, 2024, October 21, 2024, November 12, 2024. Such a quick turnaround does not allow the City to properly engage with residents and communities; therefore, the City is not taking the time to truly revise the housing element draft to reflect community needs, but most importantly the needs of R/ECAPs.

II. The Assessment of Fair Housing Fails to Adequately Analyze Racially/Ethnically Concentrated Areas of Poverty (R/ECAP).

As part of the comprehensive statutory duty to affirmatively further fair housing ("AFFH"), the housing needs assessment of a locality's housing element must comply with the requirements of Gov. Code Section 65583(c)(10) by including an "assessment of fair housing" ("AFH"), in addition to an analysis of the locality's household characteristics and housing conditions. (HCD Guidance, p.22; *see also* Gov. Code 8899.50.) The AFH must analyze how relevant factors in the locality "cause, increase, contribute to, maintain, or perpetuate" fair housing issues (HCD Guidance, p.24; *see also* Gov. Code, §§ 65583, subds. (c)(10)(A), (c)(10)(B), 8899.50, subds. (a), (b), (c).) Factors to be analyzed include spatial and temporal patterns and trends, local data and knowledge, as well as policies and practices or other information relevant to fair housing conditions. (HCD Guidance, p.25.)

Racially or Ethnically Concentrated Areas of Poverty

One mandatory portion of the AFH is an analysis of Racially or Ethnically Concentrated Areas of Poverty ("R/ECAPs") which discusses the incidence of concentrated areas of poverty and segregation within the locality, as well as within the region. (HCD Guidance, p.32; *see also* Gov. Code, §§ 65583, subd. (c)(10), 8899.50, subds. (a), (b), (c).) Both the local and regional description are crucial, because any "difference between the locality and the region is an essential part" of evaluating policies based on the priority of fair housing issues. (HCD Guidance, p.33.) The AFH should similarly analyze Racially Concentrated Areas of Affluence (RCAAs) according to the same temporal and spatial dimensions (HCD Guidance, p.33.)

In the October 7 findings letter released in response to the September errata, HCD identified several failings in the draft AFH. According to the findings, to meet the minimum level of analysis to satisfy the City's statutory obligations, the AFH must "expand the discussion of characteristics of [RECAPs] and changes over time." (HCD Findings, p.2.) One approach suggested by HCD would be to "consider a specific and individual description of each of the R/ECAPs including past and current neighborhood conditions, disparities in access to opportunity, effectiveness of past policies and investments and unique opportunities to promote equitable quality of life." (HCD Findings, pp.2-3.) In addition, HCD's findings stated that the expanded analysis "should incorporate public participation and targeted outreach to better examine needs and formulate appropriate policies and programs." (HCD Findings, p.3).

In response to these findings, the October 21, 2024 errata released by the City included expanded descriptions of 11 R/ECAPs, identified by neighborhood. (October 21 Errata, p.1E-3-31 - p.1E-3-45.) This section appears not to have been amended since the release of the October 21, as it is not included in the November 12 Errata. However, while the edits to this section did introduce a greater level of detail compared to that included in the previous draft, the

expanded descriptions fall short of what is necessary for the City to meet its duty to AFFH. In general, in spite of the HCD findings, the descriptions of area development over time are inconsistently detailed, with some R/ECAPs discussed in greater depth than others. Also, there is a general lack of analysis connecting the description of development history to the contemporary fair housing issues, and explaining how the identified programs offer opportunities to address the particular issues present in each neighborhood. Until it includes the appropriate degree of analysis, the City's AFH fails to conform to the requirements laid out in Government Code Section 65583 as articulated by HCD Guidance, and does not meet the standards set out in the HCD findings regarding the September errata. Because compliance with the requirements of Section 65583 is essential to meet the AFFH duty under Section 8899.50, this violation is inconsistent with the AB 686 goals of addressing fair housing issues and replacing segregated living patterns with integrated ones. (HCD Guidance, p.15.)

Specific shortcomings include:

- Downtown
  - While the description of the Downtown neighborhood identifies factors including redlining and the negative consequences of suburban-style development in the 1960s,[1] there is a lack of analysis connecting this historical information to the current neighborhood conditions. For instance, the section identifies "the amount of impervious surfaces results in higher levels of extreme heat" as well as "a high concentration of individuals experiencing homelessness and individuals with disabilities in the Downtown area." (October 21 Errata, p.1E-3-33.) However, these unique characteristics are not analyzed in connection with any historical trends or patterns. This discussion should be expanded to include an analysis of how policy and investment decisions made following the 1960s period of suburbanization informed the area's current character, with particular attention to the development of the identified urban-heat issue and the increase in the population of individuals experiencing homelessness as compared to the wider region. Without a discussion of the policies and practices relevant to this area during the past 50-60 years, it is not possible for this description to assist in the formulation of appropriate policies and programs to AFFH in this area.
- Jane Addams Neighborhood
  - The description of this area notes that because "the area was mostly developed while in the County, the roads did not meet City standards, lacking curb, gutter, sidewalks, and street trees." (October 21 Errata, p.1E-3-37.) However, the section lacks any meaningful analysis of this development pattern, explaining only that "[p]ast policies (or lack thereof) related to freeway construction and City-County coordination of growth and development resulted in negative impacts to this neighborhood." (*Id.*) Without any degree of analysis of the particular policies and practices, or their

[1] October 21 Errata, p.1E-3-33.

negative impacts, this description does not offer guidance for efforts to promote equitable quality of life in the neighborhood. The description should be expanded to include details of the policy gaps related to freeway construction and City-County development, and the negative impacts that have resulted from them. This would inform a better understanding of the unique opportunities to address these issues.

- Southwest Neighborhood
  - The description of this neighborhood states that it developed as a "patchwork of agricultural, residential, and industrial uses, with some commercial sprinkled throughout, resulting in land use incompatibilities" and notes that at present it suffers from "high pollution burden due to … legacy land uses" and is at "risk for extreme heat due to low tree canopy of 8%, compared to the citywide average of 15%." (October 21 Errata, 1E-3-38.) In addition, the description of the Southwest Neighborhood also refers to a local "transition pursuant to the adoption of the Southwest Fresno Specific Plan in 2017, which sought to enhance the plan area by incentivizing housing and commercial development, prioritizing parks and public facilities, and rezoning industrial land to other uses." (October 21 Errata, p.1E-3-38.) However, this description fails to analyze the recent shift back toward industrial uses in this area; and, although it identifies Program 28: Equitable Community Investments as an opportunity to remedy the results of the inequitable historical development, that program includes language which contemplates land use changes away from those specified in the Southwest Fresno Specific Plan, potentially opening the door for re-entrenchment of industrial uses in Southwest Fresno. Because this inconsistency between the issues identified in the R/ECAP analysis and the programs identified to address them means that the planned-for transition away from industrial activities might be halted or rolled back, threatening the feasibility of future residential development due to land use incompatibility, this conflict represents a failure to AFFH.

<u>Racially Concentrated Areas of Affluence</u>

The October 21 errata includes only the following discussion of RCAAs:

> "There are 18 RCAA tracts within the city limits. Several of the RCAA tracts overlap with areas that are not incorporated into Fresno city limits as of 2022. Within Fresno City, RCAAs are generally found in the North and Northeast Fresno neighborhoods, often characterized by high property values, excellent schools, and well-maintained infrastructure. Neighborhoods deemed as RCAAs include portions of the Woodward Park, Bullard, McLane, and Roosevelt community areas." (October 21 Errata, p.1E-3-45.)

Although there are more identified RCAAs within the city than R/ECAPs, the draft does not individually identify or analyze these areas. This failure is inconsistent with the requirement that an AFH consider RCAAs to "better evaluate trends, patterns, policies, and practices and to guide meaningful goals and actions to address fair housing issues." (HCD Guidance, p.33.) The AFH should be amended to include an expanded discussion of RCAAs within the city, with the necessary analysis of how factors including public participation, past policies, practices, investments, and demographic trends have resulted in the pattern of development that has resulted in the identified RCAAs.

The AFH Does Not Meet the Minimum Requirements to AFFH

As described above, there is a critical lack of analysis in the draft AFH that should have been amended in the most recent errata. Until the City expands the descriptions of identified R/ECAPs to explain the relationship between historical practices and patterns and current fair housing issues, it will not meet the requirements of Housing Element law. In addition, without this analysis, the AFH cannot support the implementation of programs to address the identified fair housing issues, and the City will fail to uphold the duty to AFFH.

III. Failure to Incorporate Community Identified Programs that will Result in a Beneficial Impact during the Planning Period and AFFH.

HCD's October 7, 2024, findings letter identified deficiencies the City needs to address in order to comply with state law: "the element must include a complete assessment of fair housing. Based on the outcomes of that analysis, the City may need to add or revise programs. Goals and actions must be significant and meaningful enough to overcome identified patterns and trends."[2] As stated in section II of this letter, the City failed to complete an adequate assessment of fair housing in the Errata, and without a complete assessment the City is unable to adequately revise the programs in the Errata. Additionally, HCD's findings letter directs the City to revise its programs to include geographic targeting and metrics, and targeting high resource areas, specific metrics, specific commitments, timing, and specificity regarding Specific Plans. We appreciate that the City included language in some of the programs that target RCAAs as well as additional timelines and specificity in this recent Errata, but additional changes are needed to fully comply with HCD's findings. Additionally, our previous comments have detailed community-identified programs that are needed to respond to critical housing needs. These programs would AFFH and replace segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity.

[2] Department of Housing and Community Development. (2024, October 7). HCD's Findings Letter to the City of Fresno on their 6th Cycle (2023-2031) Revised Draft Housing Element.

Program 1 - Maintain Adequate Sites. We appreciate that the City has added in this Errata a commitment to evaluate progress toward completion of pipeline projects annually, and to adjust its inventory relative to that progress. The city should commit to deadlines for those annual reviews to ensure that they occur–e.g., annually by July 1 or annually by the anniversary of the City Council's adoption of the Housing Element.

Program 2 – Variety of Housing Opportunities in High Resource Areas. This program's goal is to increase high density housing in high-resource areas. The City acknowledges that high density housing is placed in R/ECAPs and low-density housing like single family homes are built in new growth areas like North Fresno and other RCAAs. In order to create "mobility" the City "will present potential sites or rezoning options for land in high and relatively higher resource and income areas, including RCAAs, **for Council consideration** to provide opportunities for higher density development in all areas of the city and reduce concentrations of poverty." Only presenting potential sites or rezoning options in high resource areas for council consideration does not guarantee that they will be approved. As discussed at length in our prior comments, NIMBYism is a barrier to rezoning high density housing in high resource areas; deferring upzoning of sites in RCAAs and other high-resource areas to future discretionary Council action is a recipe for failure.

The City should be identifying sites "throughout the community," including in RCAAs and other high-resource areas, in its Housing Element. (Gov. Code 65583.2(a).) Where rezoning sites in those areas is necessary to accommodate affordable housing, the Housing Element should include a program to do so. In order to provide adequate capacity for multifamily and affordable housing in high-resource areas, the City must identify those sites in the Housing Element now, not after adoption. But, rather than ensuring a streamlined, ministerial process for housing approvals in high-resource areas, the City's current plan is to defer to a future discretionary process where City Council will have the opportunity to reject any proposed rezoning. A firm commitment now will also prevent challenges from NIMBY groups. Incorporating this action will truly develop housing opportunities for low income households in high resource areas and AFFH.

Program 2 continues to state that it will "include developing zoning standards to permit residential conversions in the Office Zone District, housing as a permitted use on parcels zoned Office, allow ministerial approval of office-to-residential conversions…" But there is no specificity around whether office zoned parcels in RCAAs will be prioritized over those in R/ECAPs. The goal of this program is "to increase housing mobility opportunities for lower-income households and encourage racially and socially inclusive neighborhoods." Most of the actions are vague such as "the City will identify and pursue opportunities to promote the development of affordable housing" in RCAAs but it does not specify how this will be done.

The last action is also vague: "the City will incorporate Affirmatively Further Fair Housing analysis into decisions affecting funding and land use approvals for housing projects that require consideration by Planning Commission, City Council, or other boards and commissions as appropriate." As noted in our prior comments, the City already has such an obligation pursuant to Government Code section 8899.50. Program 2 should commit to specific actions the City will take to ensure that it fulfills that obligation.

In order to ensure this program affirmatively further fair housing and increases housing mobility for R/ECAPs, it must:

- Identify sites RCAAs to allow multifamily residential developments in which at least 20 percent of the units are affordable to lower-income households by right, to rezoning the sites accordingly within one year of adoption.
- The City Council should adopt a policy requiring staff memos to the Council and relevant commissions to include an affirmatively furthering fair housing analysis that analyzes the fair housing impacts of any proposed decisions related to housing, as well as any applicable project alternatives. The policy should include affirmative outreach to affected communities, especially for projects in R/ECAPs.

Program 14 – Partnerships with Affordable Housing Developers. The goal of this program is "to continue to strengthen partnerships and relationships with affordable housing developers." It continues to list vague actions such as "supporting," "pursuing," "encouraging." In order to create strong relationships with affordable housing developers, the City should have addressed their concerns in the engagement process of the Housing Element and incorporated them into the Draft. Affordable housing developers need consistency, transparency, and long term commitment from the City. Building affordable housing projects takes time and funding from various avenues, therefore a streamlined process is necessary to build trust among the very few affordable housing developers that exist in the Central Valley. In addition to the existing program commitments, City should incorporate the following:

- Annually publish to the public an inventory of the City's affordable housing project pipeline that includes housing developments in various stages of development, including pre-development, planning, permitting, and near-construction. This inventory could be published in conjunction with the City's Housing Element Annual Progress Report. This will create a transparent process for both the affordable housing developers and the public.
- Make commitments to continue financing the project up to three years. Revisit the project and ensure the applicant has everything to move forward with the project.

Program 19 – Home Buyer Assistance. We appreciate the City including commitments to offer technical and financial assistance as well as reinforcing the timeframe for the project. However in order for this program to AFFH, the program must be accessible to residents who utilize an Individual Taxpayer Identification Number (ITIN). ITIN holders are part of special needs groups and among the most vulnerable to displacement and unlawful evictions. Creating opportunities to be able to own a home will give them access to opportunity and create fair housing opportunities for them.

Program 20 – Housing Choice Voucher Incentive Program. Under State law, it is illegal for landlords to discriminate against someone due to their source of income such as a voucher recipient solely on the basis of their having a voucher. The source of income discrimination is rampant throughout California.[3] The City must include meaningful actions to ensure that voucher recipients have housing choice throughout the City of Fresno but most importantly in high resource areas and RCAAs. Currently, the Errata has vague language that does not contain meaningful actions that will allow voucher recipients to have greater access to RCAAs. In order to ensure that this program affirmatively further fair housing, integrates communities, and allows for fair housing choice the city must go beyond workshops and trainings. This program should incorporate the following additions and amendments:

- Create a rent registry to keep a list of landlords throughout the City of Fresno, and to allow the City to track complaints against landlords who reject voucher tenants, by December 2025, and ensure that every tenant has access to the Rent Registry in multiple languages.
- Identify and commit to specific actions that the City will take to enforce source-of-income protections.

Program 22 – Housing Rehabilitation. We appreciate the language added to this program, we strongly urge additional actions that ensure this program truly targets residents in R/ECAPs.

- Include provisions that will allow residents with ITINs to apply to this program.
- Include temporary housing assistance, such as emergency housing vouchers, during extreme renovations. This will allow extremely low-income residents the opportunity to secure housing without accumulating additional financial burdens.
- The City must include the HOME program as a source of funding as well as setting aside five percent of its annual general fund revenue to ensure the program remains funded throughout the planning period.
- Release semi-annual reports with data on how many residents apply to the program, how many people are being funded, and whether they live in R/ECAPs.

[3] Khouri, A. (2024, Oct. 8). Housing nonprofit alleges widespread discrimination against Section 8 tenants in California. The LA Times. Retrieved from https://www.latimes.com/california/story/2024-10-08/section-8-discrimination

- Release an annual survey on how well the program is serving communities and reevaluate the program if it is not addressing the needs of the most vulnerable.

These amendments will ensure that the program is affirmatively furthering fair housing and creating place-based strategies.

Program 27 – Environmental Justice. This Errata does not include strong actions that will create healthy neighborhoods with access to opportunity such as a healthy environment (air, water, safe neighborhood, safety from environmental hazards, social services, and cultural institutions) particularly for R/ECAP communities. The Errata must include place-based strategies in R/ECAP as Environmental Justice actions that could then be reinforced in the Environmental Justice Element. The program should include the following actions to improve the quality of life in R/ECAPs, specifically in the communities residing in South Fresno:

- Implement land use changes to rezone industrial use and prohibit future industrial uses near sensitive receptors.
- Prohibit the siting of polluting uses near impacted communities and impose impact fees on polluters operating near homes. The funds generated will go towards a community benefit fund managed by the impacted community and utilized to transform R/ECAPs into areas of opportunity.
- Establish a moratorium on warehouses in or near R/ECAPs.

These recommended changes will help ensure that the program improves the quality of life in R/ECAPs and affirmatively further fair housing.[4]

Program 33 - Mobile Home Parks. In order to discourage mobile home park conversions, which both displace mobile home residents and reduce the City's supply of affordable housing, this program should include (1) a commitment to apply mobile home park zoning to existing mobile home parks, and (2) addition of relocation requirements and other protections for mobile home park residents that go beyond the requirements of Government Code sections 65863.7 and 66427.4. The latter could be included in the regulations that the program is already contemplating with respect to replacement units.

Program 34 - Eviction Protection Program. As we discussed in our meeting today, tenants need legal representation, professional mediation, and guidance in navigating the eviction process as well as landlord/tenant law to avoid displacement. The Eviction Protection Program is a critical anti-displacement tool. The Housing Element should commit to ongoing funding of the program, and to codify it in the City's municipal code by June 2025.

[4] California Department of Housing and Community Development. (2021). Affirmatively Furthering Fair Housing: Guidance for All Public Entities and For Housing Elements. p.54.

IV. Community-identified Programs that will Affirmatively Further Fair Housing.

Once again, we appreciate the City taking the time to meet with us to discuss resident-identified priorities. Per our discussion, we encourage the City to consider and ultimately incorporate the following programs that R/ECAP communities identified as anti-displacement measures which will substantially improve their quality of life and affirmatively further fair housing.

A. Rent Stabilization and Just Cause Protection Ordinance.

Objective: A Rent Stabilization and Just Cause Protection ordinance will protect existing residents from displacement. It comprises strategies that protect residents in areas of lower or moderate opportunity and concentrated poverty and preserves housing choices and affordability. Based on the data analysis from the City's Displacement Avoidance Plan, rent stabilization is critical in ensuring vulnerable tenants stay housed. Such an ordinance will also decrease the amount of evictions, thus lessen the monetary need for the Eviction Protection Program.

Actions and Timelines:

- The City will adopt a Rent Stabilization and Just Cause Protection Ordinance to protect tenants from unreasonable rent increases and unjust evictions by December 2025.
- The City will develop the ordinance collaboratively with Fresno tenants, landlords, and community based organizations.
- The City will make a diligent effort to engage Fresno tenants through outreach including but not limited to, canvassing apartment complexes. The city will host interactive convenings and workshops.
- All material, information, and verbal public education, including outreach initiatives, will be provided in a variety of languages representative of Fresno including, but not limited to, Spanish, Hmong, and Punjabi.
- The City will establish a community workgroup to develop a rent stabilization and just cause ordinance draft by March 2025. The working group will meet on a monthly basis.
- The City will release a draft ordinance for public review and announce the publication of the draft by August 2025.
- The City will adopt the ordinance no later than December 31, 2025.

Funding: Local Funds.

Responsibility: Office of the City Attorney and Office of Community Affairs.

If the City cannot commit to adopting and implementing a Rent Stabilization and Just Cause Protection Ordinance in the Housing Element, then we recommend that the City evaluate the feasibility of adopting measures to protect residents from displacement. Example strategies the City will evaluate include:

- Adopting community benefit zoning and/or other land value recapture strategy.
- Adopting an ordinance to provide for extended notice, expanded relocation benefits, and right to return when an owner evicts tenants for "no fault" causes, such as in order to remove the property from the rental market.
- Adopting a just cause eviction ordinance that expands the Tenant Protection Act's eviction protections to tenants who are not currently protected by state law–e.g., tenants in their first year of tenancy.

The City will partner with three community organizations to conduct community workshops. The City will incorporate the results of community outreach into a feasibility analysis to be released publicly and presented to the City Council in a public study session. Based on Council direction, City staff will develop a workplan to adopt the Council's recommendations.

B. Inclusionary Zoning Ordinance.

Objective: Currently, the mobility strategies in the Programs section of the Housing Element are insufficient to affirmatively further fair housing, or to create housing choice for residents living in R/ECAPs. An inclusionary housing ordinance would both increase the supply of deed-restricted affordable housing in the City and also also ensure that new units are integrated into market-rate buildings and higher-opportunity neighborhoods. Racial and economic segregation in Fresno is deeply entrenched, and concrete policies are needed to ensure integration and access to opportunity. Inclusionary housing is one of the most effective policy tools local jurisdictions have to affirmatively further fair housing, and the City should use it.

Actions and Timelines:

- The ordinance will be developed in accordance with the following guidelines
  - Apply to projects of 5 or more units
  - All new housing developments will set aside 20% of its units as affordable for households with an AMI of 50% or less in perpetuity.
  - As a compliance alternative, developers may pay an in-lieu fee that will then be used towards the development of affordable housing.

- The City will draft an Inclusionary Zoning Ordinance and adopt the Ordinance by November 2025.

- The City will implement the ordinance and require Inclusionary Zoning for all new housing developments and inform developers of compliance requirements by December 2025.

Funding: Local Funds
Responsibility: Planning and Development Department

If the City cannot commit to adopting and implementing an Inclusionary Zoning Ordinance then the alternative solution is to implement a feasibility study in the Housing Element. Preparing a feasibility study in support of an inclusionary requirement helps ensure that the requirement is right-sized for local conditions. The feasibility study would analyze local market conditions and the economics and tradeoffs of various policy options – affordability percentages and levels, incentives – to make sure the ordinance delivers the number and type of affordable units that a community needs. It also provides a data-driven foundation for the requirement, which can help overcome opposition by showing that it can be implemented without impeding the developers'ability to earn a profit.[5] We recommend the following:

- The City will hire a consultant to work on the feasibility study by June 2025.
- The City will present options to the City Council by October 2025.
- The City will adopt an inclusionary zoning ordinance by December 2025.

C. Rental Assistance Program.

As we discussed on our call, the creation of a permanent program to provide emergency rental assistance to lower-income households that are unable to pay rent or have past due payments, regardless of immigration status, would help to prevent displacement, strengthen the existing Eviction Protection Program, and affirmatively further fair housing. In light of the expiration of ERAP, the City should commit to creating and funding such a program. Funding sources could include the General Fund and Local Housing Trust Fund, as well as other sources like ESG and HOPWA. The City could time the program to correspond with the adoption of its Consolidated Plan in 2025 to ensure consistency. This would provide rental assistance to households that may not have stable income, including but not limited to field-workers, the elderly, disabled persons, etc.

V. Conclusion.

[5] Western Center on Law and Poverty. *Meeting California's Housing Needs: Best Practices for Inclusionary Housing*. Retrieved from https://wclp.org/wp-content/uploads/2018/12/inclusionary-factsheet_v2.pdf.

Thank you for considering and incorporating several of our comments. Once again, we appreciate the City taking the time to meet with us to listen to our concerns. We hope that our recommendations will be incorporated in the Housing Element Draft, this will ensure a compliant housing element and will fulfill its duty to AFFH. Additionally, we strongly urge the City not to adopt the Housing Element before being found compliant with State law. Public participation and transparency is critical to this process. The undersigned organizations welcome the opportunity to continue collaborating on the City of Fresno's Housing Element update to ensure the City is committed to meeting the housing needs of all residents, complies with state law, and provides equitable public participation opportunities throughout the revision process.

Sincerely,

/s/
Jovana Morales Tilgren
Housing Policy Coordinator
Leadership Counsel for Justice and Accountability
jmtilgren@leadershipcounsel.org

/s/
Seth Alston
Legal Advocate
Leadership Counsel for Justice and Accountability
salston@leadershipcounsel.org

/s/
Melissa A. Morris,
Staff Attorney
Public Interest Law Project
mmorris@pilpca.org
510-891-9794 x 111

Cc:

Architect, Michelle Zumwalt, michelle.zumwalt@fresno.gov
City Manager Georgeanne White, Georgeanne.White@fresno.gov
Planning Director Jennifer Clark, jennifer.clark@fresno.gov
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Councilmember Mike Karbassi, mike.karbassi@fresno.gov
Councilmember Miguel Arias, miguel.arias@fresno.gov
Councilmember Tyler Maxwell, tyler.maxwell@fresno.gov

Councilmember Luis Chavez, luis.chavez@fresno.gov
Councilmember Garry Bredefeld, garry.bredefeld@fresno.gov
Councilmember Nelson Esparza, nelson.esparza@fresno.gov
Mayor Jerry Dyer, jerry.dyer@fresno.gov
Thomas Brown, Policy Analyst, California Department of Housing and Community Development
thomas.brown@hcd.ca.gov
Paul, McDougall, California Department of Housing and Community Development,
paul.mcdougall@hcd.ca.gov

From:	Chelsey Payne
To:	Sophia Pagoulatos; Heidi GenKuong
Cc:	Michelle Zumwalt; Rebecca Pope
Subject:	RE: Public comment
Date:	Friday, November 22, 2024 11:06:38 AM

We will include this in the packet of public comment letters. You should consider whether to recommend the PC consider additional changes to address these public comments. I would not recommend making changes to what we submitted to HCD at this time, but any changes made in response to public comments from this point forward should be done through the public hearing process, similar to what you would do on any other project. Does that make sense?

Chelsey Norton Payne, AICP
D 916.306.2621 | M 916.396.2124
chelsey.payne@ascent.inc

From: Sophia Pagoulatos <Sophia.Pagoulatos@fresno.gov>
Sent: Friday, November 22, 2024 10:51 AM
To: Chelsey Payne <Chelsey.Payne@ascent.inc>; Heidi GenKuong <Heidi.GenKuong@ascent.inc>
Cc: Michelle Zumwalt <Michelle.Zumwalt@fresno.gov>
Subject: FW: Public comment
Importance: High

Hello:

Just found this email in our Housing Element in-box. How should we handle?

Sophia Pagoulatos | Planning Manager
Long Range Planning | Planning & Development
559.621.8062

From: Brandi Nuse-Villegas <cvcommunityaction@gmail.com>
Sent: Tuesday, November 19, 2024 12:32 PM
To: HousingElement <HousingElement@fresno.gov>
Subject: Public comment

External Email: Use caution with links and attachments

Thank you for all the work you have done on the housing element.

I would like to add comment on needs for Goal 7 and for the housing element at large

1. We need to commit to and implement a robust system of accountability for all programs, service providers, and the city itself. We need third party oversight with the power to address and hold all those providing services and making decisions accountable.
The issue we have seen over the past years is that there have been services implemented, but issues within the programs that aren't being addressed. For instance, due to problems in the shelters, Fresno Housing Authority worked with their service provider, Turning Point, to implement a grievance system, showing that this was needed, and something that many have brought to the city to address. However, there continues to be concerns and reports of unjust exits from the shelters, with no opportunity for the occupant to reach out and seek help addressing this.

In Program 36:
2. The city of Fresno needs to have a robust asset based community development approach, especially regarding those who are unhoused, including, but not limited to implementing a lived experience board of those who have been unsheltered/unhoused. We cannot be successful unless those whose needs we are addressing are at the table in a meaningful way.
The city needs to identify barriers to community engagement within this group, including the need to go out to those who are unhoused to listen not only for ideas but to assess existing projects.

3.The City of Fresno needs to commit in its housing element to a Housing First approach, with the recognition that getting people into permanent housing, and then supplying needed services to ensure that people are able to address any issues that are impediment to long-term permanent housing placement has been shown in research and practice to be much more successful. One of the challenges we face is that people are going into shelter only to be exited out without housing back onto the streets, when they are housing ready, when they are still in the process, even after getting treatment. It is easier to gain and maintain a job or go through the process of getting on disability and other challenges within permanent housing.

4. As well, the city needs a policy to ensure that people are not exited from shelters until they are placed in permanent housing without a just process with oversight and assistance of unhoused advocates or other advocacy if there is a reason stated to exited otherwise and remove the 90 day limit.

5. HART is not a viable program in the effort to address housing needs. While the outreach portion, HOPE Team currently, is helping with navigation and other services, all of those who are unsheltered in Fresno, from the experience of unhoused advocates, and publicly reported at city hall public comments, video documentation, and such show that the law enforcement arm has been throwing away needed belongings of those who are unhoused, including paperwork, ID cards, and such, in violation of the city municipal codes and constitutional rights. This has impeded the victims form the process of getting housing and has resulted in victims losing secured housing in multiple occasions. As well, losing living essentials causes those who are unhoused to redirect their energy from the process of getting housing to simply replacing survival supplies. This item also highlights the first point regarding accountability.

Regarding Program 34:
6. It may help to have easy to access hotline/website in which to report landlords that fail to meet requirements such as accepting vouchers in addition to violations of living conditions and illegal evictions.

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Department of Housing and Community Development Division of Housing policy Development

RE: City of Fresno's 6th Cycle (2023-2031) Draft Housing Element.

pg 1: 2

Appedix City of Fresno

Pg's 2, 4, 5,

Housing programs

Pg's 7, 8.

Pg 9 public participation

To: Planning Board Commisiuns

From: H.E.A.t for South west Fresno Community

RECEIVED

OCT 31 2024

Planning & Development Department
City of Fresno

STATE OF CALIFORNIA - BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY
GAVIN NEWSOM, *Governor*

DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF HOUSING POLICY DEVELOPMENT
2020 W. El Camino Avenue, Suite 500
Sacramento, CA 95833
(916) 263-2911 / FAX (916) 263-7453
www.hcd.ca.gov

February 1, 2024

Michelle Zumwalt, Architect
Planning and Development Department
City of Fresno
2600 Fresno Street
Fresno, CA 93721

Dear Michelle Zumwalt:

RE: City of Fresno's 6th Cycle (2023-2031) Draft Housing Element

Thank you for submitting the City of Fresno's (City) draft housing element received for review on November 3, 2023. Pursuant to Government Code section 65585, the California Department of Housing and Community Development (HCD) is reporting the results of its review. Our review was facilitated by a conversation on December 20, 2023 with the City's housing element team. In addition, HCD considered comments from Leadership Counsel, Public Interest Law Project, and California Consortium of Addiction Programs and Professionals pursuant to Government Code section 65585, subdivision (c).

The draft element addresses many statutory requirements; however, revisions will be necessary to substantially comply with State Housing Element Law (Gov. Code, § 65580 et seq). The enclosed Appendix describes the revisions needed to comply with State Housing Element Law.

As a reminder, the City's 6th cycle housing element was due December 31, 2023. As of today, the City has not completed the housing element process for the 6th cycle. The City's 5th cycle housing element no longer satisfies statutory requirements. HCD encourages the City to revise the element as described above, adopt, and submit to HCD to regain housing element compliance.

For your information, pursuant to Assembly Bill 1398 (Chapter 358, Statutes of 2021), if a local government does not adopt a compliant housing element within 120 days of the statutory deadline (December 31, 2023), then any rezoning to make prior identified sites available or accommodate the regional housing needs allocation (RHNA) shall be completed no later than one year from the statutory deadline pursuant to Government Code sections 65583, subdivision (c) and 65583.2, subdivision (c). Otherwise, the local government's housing element will no longer comply with State Housing Element Law, and HCD may revoke its finding of substantial compliance pursuant to Government

Code section 65585, subdivision (i). Please be aware, if the City does not adopt a compliant housing element within one year from the statutory deadline, the element cannot be found in substantial compliance until these rezones are completed.

Public participation in the development, adoption and implementation of the housing element is essential to effective housing planning. Throughout the housing element process, the City should continue to engage the community, including organizations that represent lower-income and special needs households, by making information regularly available and considering and incorporating comments where appropriate. Please be aware, any revisions to the element must be posted on the local government's website and to email a link to all individuals and organizations that have previously requested notices relating to the local government's housing element at least seven days before submitting to HCD.

Several federal, state, and regional funding programs consider housing element compliance as an eligibility or ranking criteria. For example, the CalTrans Senate Bill (SB) 1 Sustainable Communities grant, the Affordable Housing and Sustainable Communities program, and HCD's Permanent Local Housing Allocation consider housing element compliance and/or annual reporting requirements pursuant to Government Code section 65400. With a compliant housing element, the City will meet housing element requirements for these and other funding sources.

For your information, some general plan element updates are triggered by housing element adoption. HCD reminds the City to consider timing provisions and welcomes the opportunity to provide assistance. For information, please see the Technical Advisories issued by the Governor's Office of Planning and Research at: https://www.opr.ca.gov/planning/general-plan/guidelines.html.

HCD appreciates the hard work and dedication the City's housing element team provided during the housing element update. We are committed to assisting the City in addressing all statutory requirements of State Housing Element Law. If you have any questions or need additional technical assistance, please contact Jose Ayala, of our staff, at Jose.Ayala@hcd.ca.gov.

Sincerely,

Paul McDougall
Senior Program Manager

Enclosure

APPENDIX
CITY OF FRESNO

The following changes are necessary to bring the City's housing element into compliance with Article 10.6 of the Government Code. Accompanying each recommended change, we cite the supporting section of the Government Code.

Housing element technical assistance information is available on HCD's website at https://www.hcd.ca.gov/planning-and-community-development/hcd-memos. Among other resources, the housing element section contains HCD's latest technical assistance tool, *Building Blocks for Effective Housing Elements (Building Blocks)*, available at https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks and includes the Government Code addressing State Housing Element Law and other resources.

A. Review and Revision

Review the previous element to evaluate the appropriateness, effectiveness, and progress in implementation, and reflect the results of this review in the revised element. (Gov. Code, § 65588 (a) and (b).)

As part of the evaluation of programs in the past cycle, the element must also describe the cumulative effectiveness of goals, policies, and related actions in meeting the housing needs of special needs populations (e.g., elderly, persons with disabilities, large households, female-headed households, farmworkers, and persons experiencing homelessness). While the element provides an overview of outcomes supporting special needs populations, the element should evaluate the cumulative effectiveness of programs in addressing the objectives of the programs and programs should be revised as appropriate to reflect the results of this evaluation.

B. Housing Needs, Resources, and Constraints

1. *Affirmatively further[ing] fair housing in accordance with Chapter 15 (commencing with Section 8899.50) of Division 1 of Title 2…shall include an assessment of fair housing in the jurisdiction. (Gov. Code, § 65583, subd. (c)(10)(A).)*

   Enforcement and Outreach: While the element discusses the City's referral process for fair housing complaints, it should discuss the effectiveness of that process, including outreach. Further, the element should also discuss how the City complies with fair housing laws and any other fair housing legal matters such as consent decrees. For more information on fair housing laws, please see HCD's Affirmatively Furthering Fair Housing (AFFH) Guidance (starting on page 29) at https://www.hcd.ca.gov/planning-and-community-development/affirmatively-furthering-fair-housing.

   Concentrated Areas of Poverty: The element includes information relative to areas of High Segregation and Poverty but should evaluate the characteristics of these areas,

changes over time, comparisons to other neighborhoods in terms of equitable quality of life and consider other relevant factors, such as public participation, past policies, practices, and investments and demographic trends. The analysis should utilize local data and knowledge and other relevant factors to complement the data and analysis. Given most of the Southern portion of the City is an area of High Segregation and Poverty, and based on a complete analysis, the element should have significant and beneficial actions, including place-based strategies toward community revitalization, that are targeted towards these areas.

Racially Concentrated Areas of Affluence (RCAA): While the element briefly mentions the presence of RCAAs, it should also include a specific analysis of patterns and trends for RCAAs within the City. The analysis should at least address trends, conditions, comparisons to other neighborhoods, effectiveness or absence of past strategies, local data and knowledge and other relevant factors related to equitable quality of life. The element must add or modify meaningful programs based on the outcomes of this analysis, including actions to improve housing mobility within the City.

Disproportionate Housing Needs, Including Displacement Risk: The element includes some general information on persons experiencing homelessness but should also evaluate that information. Specifically, the element should examine disproportionate impacts on people with protected characteristics and services available and patterns of need or areas with higher concentrations of persons experiencing homelessness, including access to transportation and services. The element should utilize local data and knowledge such as service providers to assist this analysis.

In addition, to better evaluate displacement risks, the element could utilize new data available for displacement risk on HCD's AFFH Data Viewer available at https://www.hcd.ca.gov/planning-and-community-development/affirmatively-furthering-fair-housing.

Identified Sites and AFFH: The element analyzed the identified sites by income group for various fair housing components including race, income, access to opportunity, and disproportionate housing needs. However, the element should also evaluate whether the location of sites improves or exacerbates current fair housing conditions. The analysis should utilize local data and knowledge and other relevant factors to complement the data. The analysis indicates the City is primarily high- and higher-resource in the Northern portion of the City, while the Southern portion of the City is low-resource and has areas of High Segregation and Poverty. However, the analysis provided is limited to the West Area Neighborhood Specific Plan (WANSP) and the West Shaw Avenue Town Center, with no analysis describing the developed core of the City. The element must include analysis and reasoning about the location of sites and their impact on current fair housing conditions. As noted below, upon a complete analysis the City must add or modify goals and actions, specifically increasing housing mobility options and housing opportunities in high-opportunity areas.

Contributing Factors to Fair Housing Issues: The element identifies many contributing factors to fair housing issues. In addition, the element should re-assess the contributing

factors to fair housing issues and consider prioritizing these factors to better formulate policies and programs and carry out meaningful actions to AFFH.

2. *Include an analysis of population and employment trends and documentation of projections and a quantification of the locality's existing and projected needs for all income levels, including extremely low-income households. (Gov. Code, § 65583, subd. (a)(1).)*

   Analyze any special housing needs such as elderly; persons with disabilities, including a developmental disability; large families; farmworkers; families with female heads of households; and families and persons in need of emergency shelter. (Gov. Code, § 65583, subd. (a)(7).)

   Extremely Low-Income (ELI) Households: While the element quantifies existing ELI housing needs, it must still analyze their housing needs – beyond quantification. The analysis of ELI housing needs should analyze the disproportionate housing needs of ELI households, resources, the effectiveness of strategies and the magnitude of needs. For additional information, please see HCD's Building Blocks.

   Special Housing Needs: While the element generally quantifies special housing needs, it should also analyze those needs. The analysis should include, but is not limited to, factors such as household income, tenure, housing types, zoning, and available resources. Local officials, special needs service providers, or City/County social and health service providers may be able to assist with information to complete the analysis.

   In addition, while the element includes data on farmworkers, it should analyze their housing needs to better formulate policies and programs. The analysis should address trends, characteristics, disproportionate needs, the effectiveness of resources and strategies, the magnitude of the housing need, including disproportionate housing need and the effectiveness of past policies, programs, and funding to help address those gaps. The analysis may utilize past farmworker housing studies and other studies generally applicable to their special housing needs. For example, the element could utilize a recent study conducted by University California at Merced that is available at https://clc.ucmerced.edu/sites/clc.ucmerced.edu/files/page/documents/fwhs_report_2.2.2383.pdf. Based on the outcomes of the analysis, the element should add or modify programs to address this special housing need in the region.

3. *An inventory of land suitable and available for residential development, including vacant sites and sites having realistic and demonstrated potential for redevelopment during the planning period to meet the locality's housing need for a designated income level, and an analysis of the relationship of zoning and public facilities and services to these sites. (Gov. Code, § 65583, subd. (a)(3).)*

   Progress in Meeting the Regional Housing Needs Allocation (RHNA): The element may utilize constructed, approved, and pending development (pipeline) toward the RHNA. However, the element must demonstrate the affordability and availability of these developments in the planning period, as follows:

- *Availability*: The element lists developments by status and anticipated number of units, but should also discuss any phasing, anticipated build-out horizons beyond the planning period, and any known barriers to development in the planning period. Additionally, the element includes sites that have been submitted for review, but have not received entitlements, approvals, or been constructed.

- *Monitoring and Alternative Actions*: Given the degree of reliance on pipeline projects to accommodate the RHNA, the element should include a program that commits to (1) facilitating development in the planning period (e.g., coordination with applicants to approve remaining entitlements, supporting funding applications, expediting approvals) and (2) monitoring development progress toward completion and, if necessary, by a specified date (e.g., December 31, 2027), take alternative action such as rezoning or identification of additional sites by a specified date.

In addition, while the element relies on the monthly rent levels of previously-built developments, the element must also, to the extent feasible, base the affordability of approved and pending developments on the actual or projected sales, prices, rent levels, or other mechanisms establishing affordability in the planning period. This analysis should particularly address whether it is appropriate to assume new development will be affordable to moderate-income households, as noted in the element. For additional information, please see the HCD Housing Element Sites Inventory Guidebook at https://www.hcd.ca.gov/community-development/housing-element/docs/sites_inventory_memo_final06102020.pdf.

Realistic Capacity: The element notes in place of a density standard, it relies on an analysis of development standards in the respective zones and then applies a factor using projects from 2018 to 2020 to establish a capacity assumption for the planning period. However, the capacity assumptions for the planning period should go beyond this sample size and incorporate more recent projects, such as those listed in Table 1E-2.3, to establish more appropriate capacity assumptions for the planning period.

In addition, the element should account for the likelihood of 100 percent nonresidential development in zones that allow 100 percent nonresidential development. The element notes recent development activity reflect a high demand for residential development and appears to use a conservative assumption for residential development, however, the element should support these assumptions. The element should clearly describe which zones allow 100 percent nonresidential use. The element should discuss the trends in these zones for all development and how often development includes a residential component to support the residential assumption or make adjustments to account for the likelihood of residential in the calculation of capacity.

Large Sites: Sites larger than ten acres in size are deemed inadequate to accommodate housing for lower-income households unless it is demonstrated, with sufficient evidence, that sites are suitable to accommodate housing for lower-income households. The element identifies several large sites and briefly describes anticipated developable areas were identified but should also discuss recent developments of equivalent size and affordability or provide other evidence for assuming the development of housing for lower-income households. For example, the element could discuss the timing for the

West Area Neighborhood Specific Plan and West Shaw Avenue Town Center process, parceling, site planning, or other methods and how the City can facilitate appropriately sized lot sizes. Absent sufficient evidence that sites of equivalent size with affordability were successfully developed during the prior planning period or other evidence that demonstrates the suitability of these sites, the large sites are deemed inadequate to accommodate housing for lower-income households. Based on the outcomes of this analysis, the element must add or modify programs.

Suitability of Nonvacant Sites: The element describes several categories of nonvacant sites (e.g., agricultural uses planned for residential, largely vacant, parking lots) that are assumed to have redevelopment potential in the planning period and lists a few examples of sites. However, the element should support these assumptions with an analysis of additional representative sites from the sites inventory and analyze recent development trends to support assuming these categories will redevelop in the planning period. An analysis of representative sites should evaluate the extent existing uses impede additional development, past experiences converting existing uses to higher density residential development, include current market demand for the existing use, provide analysis of existing leases or contracts or other conditions that would perpetuate the existing use or prevent additional residential development.

Environmental Constraints: While the element generally describes a few environmental conditions within the City, it should also describe any other known environmental or other constraints that could impact housing development on identified sites in the planning period. Examples of other known conditions include shape, access, contamination, property conditions, easements, Williamson Act contracts, conservation easements, overlays and airport and military compatibility. Specifically, the element should describe any process delays within the Military Training Flight Route and provide a schedule for when sites subject to the Airport Land Use Commission (ALUC) will be updated per the amended Airport Influence Area (AIA) decision.

In addition, based on public comments received, the element must also evaluate the suitability of sites for residential development, particularly sites located in South Fresno adjacent to industrial and agricultural uses.

Publicly-Owned Sites: If the element is utilizing publicly-owned sites to accommodate a portion of the RHNA, it should include analysis to demonstrate their suitability and availability in the planning period. For example, the element should discuss the status, remaining steps to be available for development and any known barriers to development in the planning period including leases for existing uses or relocation of existing uses. Based on the outcome of this analysis, the element should add or modify Program 17 (Surplus Public Lands), if applicable, target numerical objectives consistent with the inventory and commit to a schedule of actions to facilitate development, including alternative actions, if necessary, by a specified date.

Electronic Sites Inventory: For your information, pursuant to Government Code section 65583.3, the City must submit an electronic sites inventory with its adopted housing element. The City must utilize standards, forms, and definitions adopted by HCD. Please see HCD's housing element webpage at https://www.hcd.ca.gov/planning-and-community-development/housing-elements for a copy of the form and instructions. The City can reach out to HCD at sitesinventory@hcd.ca.gov for technical assistance.

4. *An analysis of potential and actual governmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the types of housing identified in paragraph (1) of subdivision (c), and for persons with disabilities as identified in the analysis pursuant to paragraph (7), including land use controls, building codes and their enforcement, site improvements, fees and other exactions required of developers, and local processing and permit procedures... (Gov. Code, § 65583, subd. (a)(5).)*

Land Use Controls: The element must identify and analyze all relevant land use controls impacts as potential constraints on a variety of housing types. The analysis should analyze land use controls independently and cumulatively with other land use controls. The analysis should address any impacts on cost, supply (number of units) and ability to achieve maximum allowable densities and include programs to address identified constraints. The analysis could seek input from development community.

Local Processing and Permit Procedures: The element generally concludes that processing and permit procedures do not unduly constrain housing development. However, the element must still provide analysis to support this conclusion. An analysis should identify and analyze the permit procedure (e.g., Development Permit) for a typical development conforming to zoning, including decision-making body, number of public hearings and approval findings. The analysis should address potential impacts on housing cost, supply (number of units) and approval findings. The analysis could seek input from the development community.

On/Off-Site Improvements: The element generally describes typical on- and off-site improvements such as street widths, street lighting and rights of way. However, the element should analyze the cost impacts on a typical development, including specifically addressing public comments and add or modify programs if necessary.

Constraints on Housing for Persons with Disabilities:

- *Residential Care Facilities (Seven or More Persons)*: While the element includes a program to permit large residential care facilities in all zones where other residential uses are permitted, the element should clarify whether this use will be permitted in a similar manner to other residential uses, or subject to a Conditional Use Permit (CUP). The element must also analyze the CUP approval findings for the impacts on approval certainty relative to the approval of large residential care facilities.
- *Land Use Controls*: The element should analyze parking requirements for residential care facilities for impacts on housing cost and feasibility. Based on the outcomes of this analysis, the element should add or modify programs to address the constraints on housing for persons with disabilities.
- *Reasonable Accommodation Appeals*: While the element provides information regarding the reasonable accommodation process, the element should further clarify the appeals process for reasonable accommodations. Specifically, the element should describe whether a third-party can contest a reasonable

accommodation approval and the applicant's appeal process for a denial of a reasonable accommodation request.

C. Housing Programs

1. *Identify actions that will be taken to make sites available during the planning period with appropriate zoning and development standards and with services and facilities to accommodate that portion of the city's or county's share of the regional housing need for each income level that could not be accommodated on sites identified in the inventory completed pursuant to paragraph (3) of subdivision (a) without rezoning, and to comply with the requirements of Government Code section 65584.09. Sites shall be identified as needed to facilitate and encourage the development of a variety of types of housing for all income levels, including multifamily rental housing, factory-built housing, mobilehomes, housing for agricultural employees, supportive housing, single-room occupancy units, emergency shelters, and transitional housing.* (Gov. Code, § *65583, subd. (c)(1).)*

   As noted in Finding B3, the element does not include a complete site analysis; therefore, the adequacy of sites and zoning were not established. Based on the results of a complete sites inventory and analysis, the City may need to add or revise programs to address a shortfall of sites or zoning available to encourage a variety of housing types. In addition, the element should be revised as follows:

   - *Program 5 (Large and Small Lot Development)*: Given the City's reliance on large sites to accommodate the RHNA, the Program should include additional and proactive actions to facilitate affordable development on lots larger than ten acres. Examples include establishing incentives or other strategies to promote affordability, priority processing, assisting with funding and fee waivers.
   - *Program 25 (Development Code Amendments)*: While the Program commits to revising emergency shelter standards, it should also commit to amending the definition of emergency shelters in compliance with new statutory requirements (AB 2339).

2. *The Housing Element shall contain programs which assist in the development of adequate housing to meet the needs of extremely low-, very low-, low- and moderate-income households. (Gov. Code, § 65583, subd. (c)(2).)*

   Farmworkers: While the element briefly mentions farmworkers in a few programs, it must have specific efforts based on the outcomes of a complete analysis. For example, the element could commit to proactive actions to coordinate with nonprofit developers, employers, and other related organizations, to explore funding and incentives, annually identify specific development opportunities, pursuing strategies to integrate affordable housing and targeting rehabilitation and conservation and improvement programs toward farmworkers.

3. *Address and, where appropriate and legally possible, remove governmental and nongovernmental constraints to the maintenance, improvement, and development of*

housing, including housing for all income levels and housing for persons with disabilities. The program shall remove constraints to, and provide reasonable accommodations for housing designed for, intended for occupancy by, or with supportive services for, persons with disabilities. (Gov. Code, § 65583, subd. (c)(3).)

As noted in Finding B4, the element requires a complete analysis of potential governmental constraints. Depending upon the results of that analysis, the City may need to revise or add programs and address and remove or mitigate any identified constraints.

4. *Promote and affirmatively further fair housing opportunities and promote housing throughout the community or communities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability, and other characteristics... (Gov. Code, § 65583, subd. (c)(5).)*

   As noted in Finding B1, the element requires a complete AFFH analysis. Depending upon the results of that analysis, the City may need to revise or add programs. In addition, goals and actions must specifically respond to the analysis and the identified and prioritized contributing factors to fair housing issues and must be significant and meaningful enough to overcome identified patterns and trends. Actions must have specific commitment, metrics or numeric targets, geographic targeting, and milestones and must address, as appropriate, housing mobility enhancement, new housing choices and affordability in high opportunity areas, place-based strategies for community preservation and revitalization, and displacement protection.

5. *The housing program shall preserve for low-income household the assisted housing developments identified pursuant to paragraph (9) of subdivision (a)… (Gov. Code, § 65583, subd. (c)(6).)*

   While Program 34 (At-Risk Housing) commits to various actions to preserve at-risk units, actions, particularly noticing, appear dependent on the event that the units are not preserved. These actions should occur regardless and before the conversion of at-risk properties. In addition, the Program should commit to provide support and education to tenants early in the process.

6. *Develop a plan that incentivizes and promotes the creation of accessory dwelling units that can be offered at affordable rent... (Gov. Code, § 65583, subd. (c)(7).)*

   While Program 3 (Encourage and Facilitate Accessory Dwelling Units) includes various actions to incentivize accessory dwelling units (ADUs.), it should also monitor permitted ADUs and affordability every other year and take appropriate actions such as adjusting assumptions or rezoning within a specified time (e.g., six months).

D. Quantified Objectives

Establish the number of housing units, by income level, that can be constructed, rehabilitated, and conserved over a five-year time frame. (Gov. Code, § 65583, subd. (b)(1 & 2).)

The element must include quantified objectives to establish an estimate of housing units by income category that can be constructed, rehabilitated, and conserved over the planning period. While the element includes these objectives by income group for very low-, low-, moderate- and above-moderate income, and folds objectives for ELI households into the very low-income category, the element must separate out objectives for ELI households to accurately measure the success of programs.

E. Public Participation

Local governments shall make a diligent effort to achieve public participation of all economic segments of the community in the development of the Housing Element, and the element shall describe this effort. (Gov. Code, § 65583, subd.(c)(9).)

While the element provides an overview of public comments recently received, it must also describe how prior comments are incorporated into the housing element. In addition, the discussion of public participation should not be limited to comments received on the City's housing element and should incorporate comments received on the Multi-Jurisdictional Housing Element. Further, Self Help Enterprises has provided helpful comments to other Cities in the region that have meaningful application County-Wide. HCD encourages the City to consider these comments and will send the comments under separate cover.

Finally, public participation in the development, adoption and implementation of the housing element is essential to effective housing planning. During the housing element revision process, the City must continue to engage the community, including organizations that represent lower-income and special needs households, by making information regularly available while considering and incorporating comments where appropriate. Please be aware, any revisions to the element must be posted on the local government's website and to email a link to all individuals and organizations that have previously requested notices relating to the local government's housing element at least seven days before submitting to HCD.

October 28, 2024

Mayor Jerry Dyer
Fresno City Councilmembers
Michelle Zumwalt, Planning and Development Department
2600 Fresno Street, Room 3065
Fresno, CA 93721

Sent via email: housingelement@fresno.gov

RE: October 2024 Errata to the Revised HCD Draft Housing Element

Dear Mayor Dyer, Councilmembers, and Ms. Zumwalt:

Leadership Counsel for Justice and Accountability ("LCJA") writes in collaboration with the Public Interest Law Project ("PILP") and the other undersigned organizations to provide comments on the Errata to the Revised HCD Draft Housing Element 2023-2031. LCJA and the undersigned organizations work alongside the most impacted communities to advocate for sound policy and eradicate injustice to secure equal access to opportunity regardless of wealth, race, income, and place. As addressed in our previous letters, we advocate for vital policy and practice changes to meet the housing needs of all residents in the City of Fresno, especially low-income communities individuals with special housing needs, and BIPOC communities to overcome fair housing disparities.

I. Inadequate Community Engagement

Following the release of HCD's October findings, which instructed the City to "incorporate public participation and targeted outreach to better examine needs and formulate appropriate policies and programs" in R/ECAPs; to "continue to employ a variety of methods to gather input from all segments of the community, beyond making the document available as part of future revisions and submittals"; and to "specifically target individuals and organizations that represent lower-income households, including residents or representatives of R/ECAPs," we anticipated additional community engagement efforts from the City to solicit community input

prior to the release of additional revisions. Although we appreciate that the City incorporated relevant feedback collected from the Climate Adaptation Plan and Environmental Justice Element workshops and "Discussions with Affordable Housing Partners," we would have liked the opportunity to meet with City staff to discuss community concerns before the Errata was released, unfortunately the City released it less within a month of the previous Errata leaving very little opportunity to engage community members.

Lastly, we advocate for additional workshops, meetings, and targeted outreach in Racially and Ethnically Concentrated Areas of Poverty to inform, and complete, the Housing Element's Assessment of Fair Housing and subsequent revisions to Policies and Programs in the Action Plan.

II. Failure to Include Community-Identified Programs That Will Result in A Beneficial Impact During the Planning Period and AFFH.

Although we appreciate the City's incorporation of many of the suggestions from our most recent comment letter, including recommendations regarding community-identified programs; several of the programs still have deficiencies or could otherwise be improved to address housing needs identified by community members.

Program 1–Maintain Adequate Sites

The Errata adds language regarding project-by-project evaluation of progress toward accommodating the RHNA. However, the City should also commit to a mid-cycle review of pipeline projects, development on identified sites, and development trends, generally, to determine whether identification of additional sites or other actions are necessary to ensure that adequate sites to accommodate the RHNA–especially the lower-income RHNA–are available throughout the planning period.[1]

Program 2–Variety of Housing Opportunities in High Resource Areas

This program now commits to "[i]ncorporate AFFH into land use and funding decisions beginning in January of 2025."[2] The City is already obligated by Government Code section 8899.50 to affirmatively further fair housing in all land use and funding decisions and cannot

[1] *See* Letter from Paul McDougall to Jennifer Clark re: City of Fresno's 6th Cycle (2023-2031) Revised Draft Housing Element (Oct. 7, 2024) ("HCD 10/7/2024 Findings"), p. 3 ("[T]his Program should commit to monitor progress toward completion in the planning period and take appropriate action if projects are not anticipated to be completed in the planning period."

[2] City of Fresno. (2024). ERRATA FOR THE CITY OF FRESNO REVISED HCD REVIEW DRAFT HOUSING ELEMENT OCTOBER 21, 2024, p.1E-1-11.

defer compliance with the law until 2025.[3] Further, the City needs to commit to concrete actions that it will take to ensure that it follows through on its commitment to incorporate AFFH into future decisions. The City Council should adopt a policy requiring staff memos to the Council and relevant commissions to include an affirmatively furthering fair housing analysis that analyzes the fair housing impacts of any proposed decisions related to housing, as well as any applicable project alternatives. Such a policy would be especially valuable in Fresno, where neighborhood opposition to affordable housing functions as a major constraint to the funding, siting, and development of affordable housing and housing for homeless individuals and families.[4] Active consideration of whether a particular project will promote integration and opportunity, and of its impacts on members of groups protected by fair housing laws, will help the City to ensure that it is not allowing animus against low-income people, people with disabilities, and other protected groups to cause it to violate its duty to affirmatively further fair housing.

Program 3 – Encourage and Facilitate Accessory Dwelling Units and Small Homes

Although the City revised the program objective to include the suggested language provided in HCD's October 7th Findings letter, the City must also include extremely-low and very-low-income households in the 30 percent of ADU development that will take place in relatively higher resource and income areas and RCAAs; as well as throughout the City, in order to AFFH and promote integration. Additionally, this program should be further revised to ensure the development of ADUs is affordable to low-income households in R/ECAPs and effectively serve as a place-based strategy that affirmatively furthers fair housing. Furthermore, the City's revisions should include a clear definition for "small homes" and the difference from ADUs. Please refer to our prior comment letter for further information.

Program – 14 Partnership with Affordable Housing Developers

We appreciate that the program was revised in the September Errata to include some of the language provided in our August 7th comment letter; however, this program can be further improved with revisions that include strategies to combat NIMBYism for projects in high-resourced areas and a commitment to utilize the quarterly convening to provide stakeholders with a detailed report outlining the success of the program. Furthermore, we restate that the project's timeframe should be revised to commit to bi-annual reporting throughout the planning period, bi-annual review and assessment of potential funding opportunities, and quarterly convening with stakeholders.

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[3] *See* Gov. Code 8899.50(b)(1): "A public agency shall administer its programs and activities relating to housing and community development in a manner to affirmatively further fair housing, and take no action that is materially inconsistent with its obligation to affirmatively further fair housing."
[4] *See, e.g.,* Zisser, D. (Aug. 7, 2024). *Letter from David Zisser to Georgeanne White re: Fresno City Council's Denial of Fresno Quality Inn Homekey Project – Letter of Technical Assistance*

Program 17 – Surplus Public Lands

We appreciate that the City revised the program to be in line with the Surplus Land Act requirement to include a "minimum of 15 percent affordable units" and for adding additional strategies to rezone sites for affordable housing. However, this program still fails to outline the additional steps the City will take to ensure the development on sites located in higher opportunity areas.

Program 19 – Home Buyer Assistance

First and foremost, thank you for including commitments to offer technical and financial assistance to prospective homebuyers, ensuring that residents are guided throughout the program will greatly increase the success of the program. However, in regard to financial assistance, residents insisted that in Fresno's housing market, offering up to $200,000 in assistance, as opposed to the October Errata's revision of $100,000, will result in the greatest beneficial impact. Additionally, the program should be made available to residents who utilize an Individual Taxpayer Identification Number (ITIN).

Program 20 – Housing Choice Voucher

Although the program was revised in the October Errata in response to HCD's October findings letter, by adding a commitment "to conduct outreach to developments in high and relatively higher resource and income areas" the revision should have included RCAA and targeted outreach and advertisement in low-resourced areas as well. In doing so, the program will promote housing mobility to all City residents and in turn AFFH. Furthermore, the program still lacks meaningful actions with specific timelines and measurable outcomes that work towards "a beneficial impact." We reaffirm that this program must include actions that ensure voucher holders do not face any discrimination; for example, commiting to finance a billboard displaying the protections against HCV discrimination and providing landlords with informational material on HCV and the consequences of source-of-income discrimination; the City should also establish and fund a program within the City to actively pursue enforcement against discrimination against voucher-holders and/or funding the Eviction Protection Program, which guarantees access to legal counsel to low-income tenants on housing matters.

Program 22 – Housing Rehabilitation

Thank you for including commitments to offer technical and financial assistance; as well as reinforcing the timeframe for the project. However, this program requires additional revisions to ensure homes are preserved and well maintained. Residents stress the importance of adding

weatherization and heat resilience policies that commit to offering services that include, insulation and cooling systems, such as heat pumps. It is a necessity and will serve as a preventative measure to rehabilitation services. Additionally, residents identified the need for educational workshops and assistance prior to receiving a fine; therefore, the City's code enforcement division should serve as a secondary outreach team that refers would-be offenders to the Housing Rehabilitation program. Furthermore, this program must be accessible to residents with ITIN's. Lastly, offering Temporary Housing assistance, such as emergency housing vouchers, during extreme renovations will allow disadvantaged residents the opportunity to secure housing for themselves and their families without accumulating additional financial burdens. The City must reconsider including our suggested place-based policy to "set aside 5% of its annual general fund revenue" to ensure the program remains funded throughout the planning period.

Program 23 – Comprehensive Code Enforcement

The revisions made to Program 23's Objective in response to HCD's October findings should be more explicit. The revisions state that the City will "Conduct focused outreach and programming in older and disadvantaged neighborhoods in central and south Fresno, including Downtown Fresno. Determine any additional neighborhoods that should be identified for outreach and programming." However, the Assessment of Fair Housing Descriptions of R/ECAP Areas states that Program 23 would be applicable to the Lowell/Jefferson Neighborhood, the Edison Neighborhood, the Southeast neighborhood, the Southwest Neighborhood, Central Southeast Neighborhoods, the Mclane Neighborhood, Fresno High-Roeding Neighborhood, the El Dorado Park neighborhood, and the Shaw/Marks Neighborhood; therefore, the objective should explicitly include these communities and the timeframe should be further revised to reflect when and how often outreach will occur during the planning period. Furthermore, this program still lacks actions that would hold landlords legally accountable for retaliation, harassment, and evictions of tenants who filed code enforcement complaints. Once again, we recommend that the City analyze its code enforcement procedures, incorporate tenant feedback, and commit to adopting a tenant anti-harassment ordinance.

Program 26 – Fair Housing Services

Program 26 was revised in the September Errata, to include an action for geographic coverage and outreach and states that it "should be targeted to the most vulnerable populations as depicted in Figure 1E-3.3 – Racial Segregation by Census Tract, Figure 1E-3.7-Distribution of Poverty, and Figure 1E-3.10 – Percentage of Population with a Disability." Yet the revisions made to the AFH Description of R/ECAPs in the October Errata state that this program would "promote equitable quality of life" in Southeast and Central Southeast neighborhoods. Therefore, this action should have been further revised to explicitly include these neighborhoods and state

that this action "will target the most vulnerable populations." Additionally, this program still fails to establish timelines and concrete steps toward successfully reaching its objective to "mitigate impediments to fair housing opportunities throughout the city, with an emphasis on supporting the needs of populations and neighborhoods most impacted by fair housing issues." Furthermore, as addressed in our August comment letter, and further reinforced in HCD's October findings, the City should utilize additional public participation and targeted outreach to ensure input from Fresno residents directly impacted by discrimination, especially in R/ECAPs, so that the City understands and addresses the needs of R/ECAP residents. We still recommend the inclusion of additional legal representation, landlord education on fair housing law, and enforcement mechanisms against bad landlords.

Program 27 – Environmental Justice

The revisions made to the Environmental Justice Program in the September Errata better align the program with the requirements of the Environmental Justice Element. However, the September and October Errata should have also included place-based strategies in R/ECAP as Environmental Justice actions that could then be reinforced in the Environmental Justice Element. The program should include the following actions to improve the quality of life in R/ECAPs, specifically in the communities residing in South Fresno:

- Implement land use changes to rezone industrial use, and prohibit future industrial uses near sensitive receptors
- Prohibit the siting of polluting uses near impacted communities and impose impact fees on polluters operating near homes. The funds generated will go towards a community benefit fund managed by the impacted community and utilized to transform R/ECAPs into areas of opportunity.
- Establish a moratorium on warehouses in or near R/ECAPs and a cargo/freight Prohibition and revenue tax that directly funds community-based housing and development in communities affected by the negative environmental impacts caused by freight.
- Develop Public health impact reports to understand how industrial development may exacerbate existing public health disparities, especially in R/ECAPs; seek the support of public health agencies to complete this analysis; include these impact reports in the permit approval process and in decision making; and make these reports publicly accessible.

Additionally, the program was revised in the September Errata to state: "The City will monitor the impact of the EJ Element policies in the General Plan by developing a data tracking program to assess program outcomes in disadvantaged communities. Every five years, the City

will collect data to assess its performance against a minimum of five of the following types of measures using 2024 as the base year." This action should be revised from collecting data every five years to "annually," and to assess performance "against all of the following types of measures, and make the data publicly available through annual reporting." These recommended changes will help to ensure that the program improves the quality of life in R/ECAPs and affirmatively furthers fair housing.[5]

Program 28 – Equitable Community Investments

Although Program 28 was revised in the September Errata to include ongoing investments in West Fresno, Downtown, and Southwest Fresno, potential funding sources, and further revised in the October Errata to include commitments towards implementing and monitoring the Southwest Specific plan and Downtown Neighborhoods community plan, this program still comes short of authentic equitable community investments. The AFH Description of R/ECAP Areas identifies Program 28 as an opportunity "to promote equitable quality of life" in Downtown, Edison Neighborhood, Southeast Neighborhood, Jane Addams Neighborhood, Southwest Neighborhoods, Central Southeast Neighborhoods, McLane Neighborhood, Fresno High-Roeding Neighborhood, El Dorado Park Neighborhood, and Shaw/Marks Neighborhood, yet fails to include actions towards place-based revitalization in these communities other than the ones mentioned above. For example, the City could commit to incorporating complete street principles as an action that is applied into all transportation projects at all phases of development, including planning and land use decisions as well as implementation. The program must be further revised to explicitly describe planned revitalization strategies in all identified R/ECAPs and prioritize the South Fresno communities that have continuously advocated for additional investments that support healthy housing, infrastructure, amenities, and services. Unfortunately, in the October Errata, the language added to this program timeframe will not promote a future of equitable quality of life goals. To state that, "If land use is changed from an adopted use in a specific plan, the City will evaluate impacts and create new targets to better balance for residential industrial compatibility" demonstrates that the City is willing to create an opportunity that allows the poor land use decisions of placing unhealthy industrial zones near residential communities to reoccur. This program will not AFFH until it is revised to include clear actions and commitments for all R/ECAPs.

Program 29 – Equitable Community Engagement

Despite stating that this program will "promote equitable quality of life" for Southeast and Central Southeast neighborhoods in the October Errata's AFH description of R/ECAP, the

[5] California Department of Housing and Community Development. (2021). *Affirmatively Furthering Fair Housing: Guidance for All Public Entities and For Housing Elements.* p.54.

program fails to explicitly address the committed actions and measurable outcomes towards ensuring equitable community engagement of these communities.

Additionally, we recommended that this program be revised to include the establishment of a Housing Element Implementation Committee. As stated in our August comment letter, the Committee should be composed primarily of tenants, low-income homeowners, and at-risk populations. The goal of this committee will be to ensure that implementation meets the needs of at-risk communities and to inform potential revisions throughout the planning period.

Program 30 – Workforce Development

As stated in our August comments, we encourage the City to include additional actions that target services for the unhoused community in the workforce development program. The City should include commitments to support unhoused individuals transitioning from shelters into communities. Providing voluntary job training specifically to assist unhoused individuals apply for jobs, retain employment, and develop skills is strongly recommended. Additionally, this program still fails to integrate R/ECAP and R/ECAA.

Program 33 – Mobile Home Parks

Thank you for addressing the need for rent control policies and policies that discourage rezoning. We encourage greater specificity regarding removal of the requirement that residents must form a committee to oppose rent increases using the mobile home rent control program process, as well as adding commitments to hold Mobile Home Park owners accountable through fines for code violatons and harassment of tenants. Additionally, the October Errata was revised to include “Establish regulations to protect affordable housing on property currently occupied by mobile home parks. If the property is proposed for conversion from a mobile home park, it will be required to redevelop with a number of covenanted affordable units equal to the number of mobile home units lost in the conversion, or 10 percent of new units, whichever is higher." We recommend that the City should further reinforce this policy by committing to apply mobile home park zoning to existing mobile home parks.

More should be done for the rehabilitation and preservation of mobile homes; the city must reconsider adding commitments to weatherization services and prioritizing homes in major need of repair or at risk of having damage exacerbated by the effects of climate change. Residents have stressed the inability of their outdated and underserviced homes to withstand heat waves during the summer and floods during winter months. The dangers of extreme heat became a reality to the residents of Three Palms Mobile Home Park after a community member was found unresponsive in their home after disappearing for two weeks following an extreme heat wave. Now as residents prepare for the winter, they share that they will have to resort to the use

of multiple space heaters and the kitchen stove to keep their families warm. Similar to Program 22, residents stress the importance of making mobile home rehabilitation funds and services available to residents who utilize an ITIN, offering temporary housing assistance, utilizing the code enforcement division as an additional method for referrals and outreach, and committing a percentage of the General fund to the funding of this program.

Program 34 – Eviction Protection Program

We must reiterate the importance of securing a permanent source of funding to ensure the Eviction Protection Program remains effective throughout the planning period; therefore, the EPP should be codified in the City's municipal code and revised to state that "The City will invest in this program with money from the general fund. We strongly encourage the City to include HUD's Eviction Protection Grant Program as a source of funding and revise the program to include commitments to allocating additional funding from the City's General fund.

Additionally, the City should include a commitment to adopt a rent stabilization and just cause eviction ordinance, developed from community input, as an additional measure that guards tenants against displacement. These policies would make the eviction protection program more effective in achieving its stated purpose.

Program 35–Replacement Housing

We appreciate the City's adding a reference to the Housing Crisis Act to this program. Please note that the full citation for the Housing Crisis Act is Government Code sections 66300 to 66301, and the replacement housing requirements are found in section 66300.6. Additionally, the program should identify specific actions that the City will take to ensure that it complies with applicable replacement housing requirements–e.g., adopting a replacement housing ordinance that complies with state law–as well as actions to implement the Housing Crisis Act's other requirements for new development that demolishes existing: notice, right to return, relocation benefits, etc.

Program 36 – Homelessness Assistance

Although we appreciate the addition of actions that commit to providing "outreach to link unhoused residents with mental health and substance treatment services," " mobile home showers and restrooms for unhoused individuals through the Homeless Services Division," and " crisis intervention training to City staff that work with the unhoused community" in the September Errata, this program will not lead to a beneficial impact as written given the City's recent decision to criminalize unsheltered homelessness. The program should be further revised to include commitments towards preventative measures that ensure residents residing in shelters

remain on a path towards permanent housing, including applying for additional funding to ensure shelters have sufficient beds. Furthermore, the City should include the recommendations outlined in our August comment letter to demonstrate a clear commitment towards homelessness assistance.

III. The Assessment of Fair Housing Fails to Comply with Section 65583(c)(10)

The Housing Element fails to include an assessment of fair housing ("AFH") that meets the requirements of State law, and it also fails to include adequate programs to affirmatively further fair housing ("AFFH").[6] HCD's findings released on October 7, 2024, ask the City to "expand the discussion of characteristics of [each of the R/ECAPs]and changes over time" including "past and current neighborhood conditions, disparities in access to opportunity" and the "effectiveness of past policies and investments and unique opportunities to promote equitable quality of life."[7]The findings also state that the Draft should incorporate public participation and targeted outreach to better examine needs and formulate appropriate policies and programs; such an effort will help complete the assessment of fair housing and clarify the need for the City to add or revise programs.[8]Furthermore, the new and revised goals and actions "must be significant and meaningful enough to overcome identified patterns and trends."[9]

We appreciate the edits to the Local Assessment of Fair Housing Section to include a *Description of R/ECAP Areas*, that lists the different R/ECAPs, describes them, and reports data that outlines the lack of access to opportunity. Unfortunately, though, the assessment is incomplete. The Errata did not incorporate past local knowledge from residents. It also excludes prominent policies and programs recommended and created by residents from the Here to Stay Report,[10] which we incorporated in Section II of this letter. Although the *Description of R/ECAP Areas* lists the programs that are intended to create opportunities to promote equitable quality of life, the programs themselves fail to include specific commitment to deliverables, measurable metrics or objectives, definitive deadlines, dates, or benchmarks for implementation in order for them to have a "beneficial impact" during the planning period (please refer to the Section II of this letter).

A. Incomplete Analysis of Displacement Risks

The Errata did not include additional analysis of displacement risks. It fails to consider relevant information such as COVID-19 related rent increases and evictions and its impact

[6] Gov. Code §§ 65583(c)(5),(10); 8899.50; 65583.2(a).
[7] HCD 10/7/2024 Findings, p.1.
[8] *Id.* p.2
[9] *Ibid.*
[10] Thrivance Group. (2021). *Here to Stay: A Policy Based Blueprint for Displacement Avoidance in Fresno.* https://www.transformfresno.com/wp-content/uploads/2021/06/transform-fresno-here-to-stay-report-english.pdf

relating to existing and potential housing cost pressures confronting low-income residents, residents of color, and other protected classes, as well as significant displacement risks associated with tenant protection limitations, City land use policies and practices, environmental hazards, and climate change. A complete displacement risk analysis must consider these and other relevant factors.[11] The AFH's Displacement Risk section should be revised to consider displacement risks associated with environmental hazards, environmental disasters, and climate change, pursuant to HCD's AFFH Guidance.[12]

It is important to note that the City must continue to fully analyze the displacement risks to R/ECAPs and the impacts associated with housing cost pressures. We reiterate that, although data for 2019 has been included, this time period does not capture the sharp and sustained escalation in housing costs (both rental and ownership) that occurred during the COVID-19 pandemic between 2019 and 2022.[13] Between 2017 and 2021, Fresno experienced the greatest rent increases of all large U.S. cities, with rental prices increasing nearly 39% during that time.28 The City failed to include this vital analysis and therefore the AFH's displacement risk analysis must be supplemented with and revised based on more recent data in order to adequately fulfill this requirement.[14]

A complete analysis of displacement risks considers not only displacement risks associated with housing cost pressures, but also other factors which result in housing instability, including factors relating to the adequacy of tenant protections, disinvestment, local land use policies and practices, environmental hazards, and risks associated with natural disasters and climate change. Although the Errata acknowledges that extreme heat impacts R/ECAPs, it failed to analyze those impacts. Based on our direct work with tenants and low-income residents and residents of color, these risk categories represent real and significant risk factors for Fresno residents. Once again, we ask that the City incorporate the following analysis and assessment to the Displacement risk section:

- Address the adequacy of policies and resources to protect tenants from displacement as a result of eviction, harassment, and substandard housing and include additional and stronger policies and programs to protect tenants, including in particular more comprehensive and stringent rent control standards than those established by the state, just cause requirements for eviction, and right to return home for displaced residents.
- Analyze the success and effectiveness of the City's code enforcement programs.

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[11] *See* California Department of Housing and Community Development. (2021). *Affirmatively Furthering Fair Housing: Guidance for All Public Entities and For Housing Elements (p.40-43).*
[12] *Id.* at p.42.
[13] CalMatters, Real estate prices soar during the pandemic, climbing 25% in parts of California, Dec. 5, 2020, available at https://calmatters.org/california-divide/2020/12/real-estate-climb-pandemic/
[14] Gov. Code §65583(c)(10)(A)(ii); *See also* California Department of Housing and Community Development. (2021). *Affirmatively Furthering Fair Housing: Guidance for All Public Entities and For Housing Elements.* pp.39.

- Consider the extent to which public and private disinvestment and unequal investment continues to impact low-income neighborhoods, neighborhoods of color, and neighborhoods with a high proportion of tenants and how disinvestment perpetuates and/or increases displacement risk in these areas.
- Consider the City's land use and permitting decisions which have directed and continue to allow for and promote the concentration of industrial and waste management facilities in and around neighborhoods in Jane Addams, Southwest Fresno, South Central Fresno (referred to by the Draft Housing Element as the "South Industrial Area"), and Southeast Fresno.
- Consider displacement risks associated with environmental hazards, environmental disasters, and climate change, pursuant to HCD's AFFH Guidance.[15]

B. Incomplete analysis of the City's response to homelessness.

As noted in prior comments, the City is aggressively criminalizing unsheltered homelessness while, at the same time, preventing the siting of supportive housing that would serve its unhoused population. These actions cause disproportionate harm to the City's Black and disabled residents, but the City has failed to engage in a thorough analysis of their discriminatory effects; nor has the identified adequate program actions to address those effects, as discussed above. The Errata adds Figure 1E-3.33 illustrating unsheltered camping locations throughout the City and their proximity to services,[16] but it does not acknowledge that the City absolutely bans unsheltered camping and is actively displacing–including through arrest–people attempting to live unsheltered near services and facilities. According to one report, Fresno police arrested 30 people under the City's new anti-camping ordinance between its September 24, 2024, effective date and October 11, 2024.[17] But, other than acknowledging that the local independent living center expressed concerns regarding the City's criminalization of unsheltered homelessness and its impacts on people with disabilities, the Errata does not discuss the ordinance at all.[18] Without an analysis of the City's criminalization of homelessness, the Assessment of Fair Housing remains incomplete.

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[15] California Department of Housing and Community Development. (2021). *Affirmatively Furthering Fair Housing: Guidance for All Public Entities and For Housing Elements, p.42.*

[16] *See* City of Fresno. (2024). ERRATA FOR THE CITY OF FRESNO REVISED HCD REVIEW DRAFT HOUSING ELEMENT OCTOBER 21, 2024, pp. 1E-3-90 to 1E-3-91.

[17] Thaddeus Miller, What's new anti-camping law impact on Fresno homeless? Way more arrests than treatment, Fresno Bee (Oct. 11, 2024), available at https://www.fresnobee.com/news/local/crime/article293730944.html#storylink=cpy.

[18] *See, e.g.,* City of Fresno. (2024). ERRATA FOR THE CITY OF FRESNO REVISED HCD REVIEW DRAFT HOUSING ELEMENT OCTOBER 21, 2024, pp. 1E-6-26 ("The representative expressed concern about laws in the City of Fresno that prevent homeless community members from camping or living in their cars. . . .")

Similarly, the City also has not added analysis regarding the factors that caused its denial of the Quality Inn Homekey project in December 2023.[19] Such analysis is necessary to ensure that the single program identified to prevent future denials–Program 2–will be effective.

IV. Failure to Adequately Analyze Housing Constraints

A. Governmental Constraints

In response to the initial draft released by the City, we raised concerns that the City did not adequately analyze constraints as required by Government Code section 65583(a)(5) , and did not provide sufficient support for the conclusions reached by the City. Further, we have continually advocated for the inclusion of various meaningful suggestions from residents as to actions which would remove barriers to development and further the accessibility of affordable housing in the city in the analysis of governmental constraints.

Further, throughout the drafting process, the analysis of governmental constraints has failed to adequately consider the actual constraints to the development of affordable housing posed by the zoning districts implemented by the development code. In the Local Assessment of Fair Housing of the Draft Housing Element, the City acknowledges the incompatibility of widespread single-family detached only zoning (zoning districts RE, RS-1, RS-2, and RS-3) that prohibits zero lot line dwellings, townhomes, rowhomes, duplexes, and triplexes with the objective of expanded affordable housing.[20] At the same time, the zoning code allows single-family detached development by-right in many of the zones identified for increased high-density development: RM-1, NMX, CMX, RMX, CMS, CR, DTN, DTG. As part of the City's existing land use policies, the zoning districts should be analyzed as potential constraints on the development of multifamily affordable housing.

In addition, as neither the September errata nor the October errata to the July 2024 draft amended the analysis of at-risk housing, we want to restate that the Housing Element's analysis of at-risk housing is inadequate. A total of 695 units were identified in the September 2024 errata as being at risk of conversion from low-income residential uses to other uses within 10 years from the housing element adoption deadline.[21] However, this draft failed to meaningfully address the extent of the risks to publicly assisted affordable housing or to propose actions to meaningfully address these risks. As the October 2024 errata was released without Section 1E-4:

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[19] *See* Errata, p. 1E-3-137.
[20] "Affordable housing development typically requires high-density zones to support construction and financing; therefore, zones limited to single dwelling units on each lot do not support affordable development." City of Fresno. (2024). ERRATA FOR THE CITY OF FRESNO REVISED HCD REVIEW DRAFT HOUSING ELEMENT OCTOBER 21, 2024, p.1E-3-113
[21] City of Fresno. (2024). ERRATA FOR THE CITY OF FRESNO REVISED HCD REVIEW DRAFT HOUSING ELEMENT, SEPTEMBER 23, 2024, p.1E-4-62.

Constraints, these errors remain uncorrected. The lack of any expansion of this analysis in the most recently released errata demonstrates that the City has failed to appropriately discuss which action would be most appropriate for the City and whether there would be any constraints posed to the action, as required under Government Code section 65583(a)(5).

Throughout the drafting process, we have uplifted ways this section should be improved to achieve consistency with Housing Element law, to better effectuate the goal of improving access to affordable housing within the City of Fresno, and to reflect the concerns and suggestions of residents. We again urge the City to analyze the lack of tenant protections (e.g. source of income discrimination outreach and education, rent stabilization, and just cause protections) and how they may facilitate the displacement of lower-income renters. Because of the potential for displacement, the lack of these protections should be analyzed as a constraint on the maintenance of housing under Government Code section 65583(a)(5).

B. Non - Governmental Constraints

Although we have made previous comments on the importance of analyzing non-governmental constraints,[22] unfortunately the Errata continues to exclude such an analysis even though public comments have been submitted in response to this specific issue. The Draft failed to consider the effect of NIMBY opposition and environmental concerns.

1. NIMBY Opposition

Once again, we reiterate that the Draft must include an analysis of NIMBY opposition to affordable housing development. As a largely sprawling suburban City, Fresno is prone to local opposition to increased density from existing single-family homeowners who have preconceived ideas of the impacts of increased density on their neighborhoods. NIMBY opposition is all too common and a pervasive issue when building multi-family projects in high-resourced areas. We recommend that the City include an analysis and incorporate programs that will address this, such as an inclusionary housing ordinance.

2. Environmental Concerns

The Errata failed to include additional amendments and analyses on environmental constraints.[23] Environmental constraints may include limitations to water supply, nearby pollution, or infrastructure development. Per our previous comment letters, we have noted that the City of Fresno relies heavily on groundwater and surface water.[24] As climate change makes

[22] *See* Gov. Code § 65583(a)(6).
[23] *Id.*
[24] *See* Leadership Counsel for Justice & Accountability. City of Fresno Draft 6th Cycle Housing Element Comment Letter, August 16, 2023.

water availability less predictable the City must analyze how an increased population and land use will affect water availability and whether water availability will eventually constrain growth. Additionally, the City must consider the infrastructure requirements of delivering water to a denser population. For example, the City estimates that downtown Fresno, where a large portion of new housing development is projected, currently requires significant water and wastewater infrastructure upgrades. Although Program 28 - Equitable Community Investments is amended to acknowledge the need, it fails to include concrete steps to achieve this; it simply says they "will continue to prioritize investment in underserved neighborhoods" or "water, sewer, stormwater, and other infrastructure improvements to accelerate mixed-income infill housing development by 2031." The program must have concrete steps, objectives, and metrics on how the City plans to improve infrastructure.

The Errata also failed to consider industrial and polluting industries' effects on future housing development. As we mentioned in our previous comment letters, the City must also analyze as a constraint the proliferation of warehouses and other industrial uses in and around the City, particularly in South Fresno. These industrial and warehouse projects come with an enormous increase in vehicle traffic and worsen already very poor air quality. They also result in light, sound, and vibration pollution. Many of these projects are being approved next to residential development with no buffer, driving down housing value, and worsening housing conditions. The City must consider warehouse and industrial use proliferation as a constraint, and identify impacts to residents. The City must then commit to adopting strong programs and policies with enforceable timelines to address the constraint.

Additionally, the City of Fresno has evolved as a car-dependent City surrounded by heavy industry and highways. Therefore, future housing development will need to carefully consider placement and mitigation measures to avoid perpetuating environmental inequity.

V. Conclusion

Thank you for considering and incorporating several of our comments. The undersigned organizations welcome the opportunity to continue collaborating on the City of Fresno's Housing Element update to ensure the City is committed to meeting the housing needs of all residents, complies with state law, and provides equitable public participation opportunities throughout the revision process. We look forward to meeting with the City to further discuss community priorities in detail and learn how the City will commit to its duty to Affirmatively Further Fair Housing.

Respectfully,

/s/
Emmanuel Agraz-Torres, Policy Advocate
Leadership Counsel for Justice and Accountability

/s/
Seth Alston, Legal Advocate
Leadership Counsel for Justice and Accountability

/s/
Melissa A. Morris, Staff Attorney
Public Interest Law ProjectPublic Interest Law Project
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/s/
Sandra F. Celedon, President and CEO
Fresno Building Healthy Communities

/s/
Lilia Becerril, Founder
Familias en Acción

/s/
Marisa Moraza, Political Director
PowerCA Action

/s/
Alexandra Alvarado, Community Organizer
Faith in the Valley

/s/
Dez Martinez, CEO
We are Not Invisible

City of Fresno Community Residents
Lisa Fores, District 2
Yonas Pauloas, District 3

Cc:

Architect, Michelle Zumwalt, michelle.zumwalt@fresno.gov
City Manager Georgeanne White, Georgeanne.White@fresno.gov
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Councilmember Nelson Esparza, nelson.esparza@fresno.gov
Mayor Jerry Dyer, jerry.dyer@fresno.gov
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thomas.brown@hcd.ca.gov
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Habitat for Humanity® Greater Fresno Area

Mayor Jerry Dyer
City of Fresno
Planning and Development Department
2600 Fresno Street, Rm 3043
Fresno, CA 93721

Date:

Dear Mayor Dyer:

4991 E. McKinley Suite 123
Fresno CA 93727

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www.habitatfresno.org

HFHGFA Board of Directors
Jim Tienken, Chair
Feleena Sutton
Dale Spencer
Steve Jones
Mel Casey
Sabrina Brown
Patrick Prince
Jose Platas
Zak Johnson

CEO
Ashley Hedemann

The purpose of this letter is to express our support for the latest draft of the City of Fresno Housing Element, including the Errata dated October 21, 2024. As you are aware Habitat for Humanity Greater Fresno Area (HFHGFA) has worked closely with the City of Fresno on bringing affordable homeownership opportunities to residents of this community for the last 39 years. Most recently, HFHGFA has taken part in the Multijurisdictional Housing Element process since it began in 2022, participating in outreach events and commenting on previous drafts. We are pleased with the efforts the City of Fresno is undertaking to address community needs related to housing availability, affordability and accessibility in this Housing Element cycle.

Most recently we have collaborated with City staff on refining Housing Element programs to further remove barriers to the development of affordable housing in the latest draft. Specifically, we worked with staff to modify the Action Plan in Chapter 1 as follows:

Program 4: Streamline Development Review Process

- Added a provision to ensure that both the building permitting and entitlement processes were covered for future streamlining efforts

Program 14: Partnerships with Affordable Housing Developers

- Added a provision to work with affordable housing developers to structure annual funding commitments to support multiple rounds of tax credit applications
- Added a provision to identify opportunities to align entitlement and permit approvals for affordable housing projects with funding deadlines (e.g., HOME), including post-entitlement processes like encroachment permits
- Added a provision to participate in joint advocacy for CEQA streamlining of single-unit affordable housing

Program 15: Land Bank

- Added a provision to work to remove blight from any banked properties

Program 16: Community Land Trust

- Added a provision to collaborate on maintaining vacant sites once acquired, and to provide support for staff, stakeholder and community education on land trust models

We look forward to continuing our work in partnership with the City of Fresno and doing our part to implement the 6th Cycle Housing Element through creating additional homeownership opportunities.

Building Together,



CEO Habitat Greater Fresno Area

California Department of Transportation

DISTRICT 6 OFFICE
1352 WEST OLIVE AVENUE | P.O. BOX 12616 | FRESNO, CA 93778-2616
(559) 840-6066 | FAX (559) 488-4195 | TTY 711
www.dot.ca.gov

October 28, 2024

FRE-41-22.50
CITY OF FRESNO
HOUSING ELEMENT
GTS #: FRE-2024-02096

SENT VIA EMAIL

Ms. Sophia Pagoulatos
Planning Manager
City of Fresno – Planning and Development Department
2600 Fresno Street, Room 3043
Fresno, CA 93721

Dear Ms. Pagoulatos:

Thank you for the opportunity to review of the Errata for the City of Fresno's, Revised HCD Review of the Draft Housing Element dated October 21, 2024, which includes revisions to extracted chapters from the revised HCD Review Draft Housing Element.

The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. Caltrans provides the following comments consistent with the State's smart mobility goals that support a vibrant economy and sustainable communities:

1. Caltrans fully supports Goal 6 and Program 31, which aligns with essential steps toward energy conservation and sustainable development in our community. Reducing or waiving fees for Vehicle Miles Traveled (VMT), especially for projects near high-quality transit corridors or those with a significant proportion of affordable housing, reflects a forward-thinking approach. This exemption not only aligns with California Environmental Quality Act (CEQA) requirements but also incentivizes the creation of affordable housing and bolsters active transportation solutions, like walking and cycling infrastructure, which are key for reducing overall vehicle dependency.

2. By setting clear timelines to establish affordable housing thresholds and a VMT mitigation fee by 2026, the City of Fresno is creating a structured pathway to lessen both the costs and the processing times associated with VMT analysis in new developments. These measures will likely increase project feasibility, promote eco-friendly transit options, and make the community more accessible. Additionally, dedicating funds for active transportation capital improvements will lead to

tangible environmental benefits, creating a cityscape that encourages sustainable travel while improving residents' quality of life.

3. This Goal and Program is a commendable move that balances the need for growth with sustainability, and Caltrans is optimistic about the positive impact it will have on the City of Fresno's infrastructure and environmental footprint.

If you have any other questions, please call David Deel, Associate Transportation Planner at (559) 981-1041.

Sincerely,



Mr. Dave Padilla, Branch Chief, Transportation Planning

Copy:
City of Fresno, **Planning@fresno.gov**.

FRESNO VIBRANT COMMUNITIES
QUALITY HOUSING HOUSING ENGAGED RESIDENTS

1331 Fulton Street
Fresno, California 93721

(559) 443-8400
TTY (800) 735-2929

www.fresnohousing.org

October 25, 2024

Mayor Jerry Dyer
City of Fresno
Planning and Development Department
2600 Fresno Street, Rm 3043
Fresno, CA 93721

RE: City of Fresno Housing Element 2024

Dear Mayor Dyer:

The purpose of this letter is to express our support for the latest draft of the City of Fresno Housing Element, including the Errata dated October 21, 2024. Our organization, Fresno Housing Authority has taken part in the Multijurisdictional Housing Element process since it began in 2022, participating in outreach events and commenting on previous drafts. We are pleased with the efforts the City of Fresno is undertaking to address community needs related to housing availability, affordability and accessibility in this Housing Element cycle.

Most recently we have collaborated with City staff on refining Housing Element programs to further remove barriers to the development of affordable housing in the latest draft. Specifically, we worked with staff to modify the Action Plan in Chapter 1 as follows:

Program 4: Streamline Development Review Process

- Added a commitment to continue providing navigation and concierge services to assist applicants with entitlement and permit processing for affordable housing projects
- Added a provision to ensure that both the building permitting and entitlement processes were covered for future streamlining efforts

Program 11: Incentives for Housing Development

- Added a provision to provide flexibility in meeting off-site infrastructure requirements for affordable housing projects

Program 14: Partnerships with Affordable Housing Developers

- Added a provision to work with affordable housing developers to structure annual funding commitments to support multiple rounds of tax credit applications

- Added a provision to identify opportunities to align entitlement and permit approvals for affordable housing projects with funding deadlines (e.g., HOME), including post-entitlement processes like encroachment permits

We look forward to continuing our work in partnership with the City of Fresno and doing our part to implement the 6th Cycle Housing Element.

Best Regards,

Tyrone Roderick Williams

Tyrone Roderick Williams

Chief Executive Office

A Nonprofit Housing and Community Development Organization

October 23, 2024

Sophia Pagoulatos
Planning Manager
Long Range Planning, Planning & Development
City of Fresno
2600 Fresno Street
Fresno, CA 93721

Re: Housing Element Participation

Dear Ms. Pagoulatos,

This letter serves to confirm Self-Help Enterprises (SHE) involvement in the development of the City of Fresno draft Housing Element (2023-2031). SHE has engaged in several ways through the development of the Housing Element (HE) as follows:

- SHE provided specific written feedback on the prioritization of by-right permitting, which has been incorporated in the HE draft.
- SHE staff participated in group stakeholder meetings.
- The City of Fresno engaged SHE for one-on-one discussion and reviewed specific programs that relate to SHE's work and comments, and the City absorbed and incorporated that feedback in the draft.

Should you have any questions about SHE's participation, please contact me at (559) 802-1653 or betsyg@selfhelpenterprises.org.

Sincerely,

Betsy McGovern-Garcia

Betsy McGovern-Garcia
Vice President

September 30, 2024

Mayor Jerry Dyer
Fresno City Councilmembers
Michelle Zumwalt, Planning and Development Department
2600 Fresno Street, Room 3065
Fresno, CA 93721

Sent via email: housingelement@fresno.gov

RE: Errata to the Revised HCD Draft Housing Element

Dear Mayor Dyer, Councilmembers, and Ms. Zumwalt:

Leadership Counsel for Justice and Accountability ("LCJA") writes in collaboration with the Public Interest Law Project ("PILP") to provide comments on the Errata to the Revised HCD Draft Housing Element 2023-2031. LCJA works alongside the most impacted communities to advocate for sound policy and eradicate injustice to secure equal access to opportunity regardless of wealth, race, income, and place. As addressed in our previous letters, we advocate for vital policy and practice changes to meet the housing needs of all residents in the City of Fresno, especially low-income communities individuals with special housing needs, and BIPOC communities to overcome fair housing disparities.

I. Lack of Community Engagement

The Errata, released near the end of HCD's review of the City's July 2024 Draft Housing Element with only seven days for public feedback, continues the City's failure to demonstrate a diligent effort to engage the community throughout the revision process. The City failed to:

- Host additional public engagement opportunities to solicit feedback from the community, particularly R/ECAP communities, to incorporate that feedback into the Errata;
- Communicate to stakeholders about the development of substantial revisions during the HCD review process; and
- Provide sufficient time to ensure that community members, in particular visually impaired residents, are able to review and comment on the Errata.

- LCJA, its coalition partners, and community members want to participate in the development of the Housing Element to ensure that its analysis and programs reflect the community's needs, but, the City's process has made that participation very difficult.

II. The Errata Amendments fail to contribute to a compliant Assessment of Fair Housing

Although the Errata amends the draft Housing Element on page 1E-3-26, to include an analysis of past actions that led to R/ECAPs in Downtown neighborhoods, South Fresno, the neighborhoods in the Bullard, Shaw/Blackstone area, and the Hoover community of North Fresno, the analysis still fails to contribute to a compliant assessment:

- The amendments fail to evaluate public participation and demographic trends or contributing factors that led to the concentration of South Asians, Hispanics/Latinos, and/or African Americans living in R/ECAP and RCAAs. § 65583(c)(10)(A)(iii); AFFH Guidance, p. 33. The City has local information at its disposal that should be incorporated into this evaluation to adequately inform policies and programs in the Action Plan.[1]

- The City briefly addresses actions leading to R/ECAPs in South Fresno and it claims that "the City is investing in these neighborhoods as well, with several specific planning efforts complete or underway, including …the South Central Specific Plan (SCSP)." However, this fails to address current practices given the fact that the SCSP will only benefit industrial development. Please refer to our previous comment letter addressing the SCSP (see Attachment A).

HCD's February 1, 2024 findings addressed the need to compare R/ECAP and RCAA's "in terms of equitable quality of life." On page 1E-3-29, the Errata includes a section on the impacts the "built environment" has on the quality of life and goes on to list "physical activity, good housing conditions, and access to healthy food and healthcare" as positive impacts of a built environment that are then used as metrics to interpret data from studies comparing access to opportunity in R/ECAPs and RCAAs.[2] However, this comparison falls short of an adequate quality of life comparison of the R/ECAP neighborhoods in South Fresno and the RCAA neighborhoods in North Fresno:

- The amendment fails to provide "comparisons to other neighborhoods in terms of equitable quality of life" and only inconsistently identifies the locations of R/ECAP and RCAA within the city when evaluating their proximity to infrastructure and facilities.

---

[1] Brown, B., Heer, N., Love, N., Pollard, K., Thomas, D. (2021, June 9). Here To Stay: A Policy-Based Blueprint For Displacement Avoidance in Fresno. *Thrivance Group*. https://www.transformfresno.com/wp-content/uploads/2021/06/transform-fresno-here-to-stay-report-english.pdf

[2] HCD 2/1/2024 Findings, p. 2.

- The quality of life comparison acknowledges the disparities in infrastructure between R/ECAPs and RCAAs, but it fails to identify policies, programs, and future investments to address these disparities.
    - For example, the Errata includes "Park Access" amendments acknowledging that RCAAs have more access to green spaces that are in "fair to good condition," as opposed to the parks in R/ECAPs, which were determined to be in poor to fair condition, and it adds that the Fresno PARCS Department identified 21 high needs neighborhoods that should receive 50% of Measure P funds; yet the Errata fails to identify a solution that would improve access to green spaces in R/ECAP. Furthermore, community engagement in R/ECAP communities would reveal that residents in Southwest Fresno want additional recreational equipment at Maxie Park, including a completely paved track; Southeast residents near Winchell Elementary want a family-oriented neighborhood park with ample shade trees; and Jane Addams residents have stated that Basin XX park does not meet their families needs.

The amendments on pages 1E-3-137-138 regarding Southwest Fresno fail to acknowledge and analyze the City's current efforts to promote industrial development in Southwest Fresno, contrary to the Southwest Fresno Specific Plan and input from local residents. Therefore, these amendments fail to incorporate the full context of changes over time and current practices in the AFH. AFFH Guidance, p. 33.:

- On page 1E-3-138, the City states that the 2017 SWSP "reimagines this area as transitioning from industrial to a series of small, complete neighborhoods" and "the City recognizes that there are land use incompatibilities that could have negative impacts."[3] However, in recent years, the City has worked relentlessly with developers to rezone Elm Ave from Neighborhood Mixed use zoning back to Light Industrial, and, earlier this year, the City council approved the development of a Warehouse in Southwest Fresno.[4]

- The City's amendment on page 1E-137 states, "given the proximity to industrial uses, the City reviewed sites in the inventory adjacent to existing industrial uses, specifically near State Route 41, and removed those sites which would be most impacted during the timeframe of this Housing Element." Simply removing these sites from the inventory is not enough to address the impact of industrial uses on existing and future housing in Southwest Fresno and the City should make stronger commitments to prevent the rezoning of this area to light industrial given that the community spent over two years

[3] HCD 2/1/2024 Findings, p. 2.
[4] Weaver, G. (2023, Nov 7). 'I want industrial gone.' Frustrated residents slam southwest Fresno rezone plans. *Fresnoland.* https://fresnoland.org/2023/11/07/southwest-fresno-rezone/, Morano, J. (2024, Feb 22). $100 million warehouse headed for southwest Fresno despite unanswered pollution questions. *Fresnoland.* https://fresnoland.org/2024/02/22/new-fresno-warehouse/

creating the SWSP to remove industrial sites away from sensitive receptors of their homes and schools. The City must commit to removing improper land uses near Community.

The Errata failed to include a proper analysis and subsequently a compliant AFH; therefore, the current programs fail to create integrated healthy communities in R/ECAP.

III. Homelessness

The Errata acknowledges a technical assistance letter dated August 7, 2024, from HCD's Housing Accountability Unit regarding the City's December 2023 rejection of Homekey 3 funds for a project that would have provided 58 permanent supportive housing units for people experiencing homelessness in a moderate-resource area.[5] However, the Errata does not add any analysis regarding the impacts of the denial nor the factors that caused it. As HCD noted: "The City's decision to return its Homekey award rendered the Project infeasible, thereby worsening access to affordable homes for the unhoused population in areas outside of R/ECAPs and to affordable housing in general. This decision raises concerns about whether it was 'materially inconsistent' with the City's obligation to AFFH."[6] But the Errata's only response to these serious fair housing concerns is the addition of the following language to Program 2: "The City will include in project approval documentation a statement of the City's obligation to Affirmatively Further Fair Housing and an accompanying analysis of project consistency with the law."[7] Notably, such a policy would not have had even a nominal impact on the December 2023 Homekey project denial because (1) it only applies to project approvals, not denials; and (2) it does not apply to funding decisions. Further, an after-the-fact recitation of existing law and analysis of how an approved project complies with the duty to AFFH is not adequate to prevent discrimination against projects that serve unhoused individuals and people with disabilities. The Housing Element should commit to a robust AFFH analysis in advance of all discretionary decisions affecting housing siting and funding, including analysis of project impacts and alternatives and discussion of the project's relationship to Fresno's long-standing patterns of racial and economic segregation,[8] to ensure that future approvals and denials are consistent with the City's duty to affirmatively further fair housing.

The Housing Element must also analyze the City's recent policy choices and the City Council's demonstrated animus against the City's unhoused residents as constraints to meeting the needs of unhoused individuals and families, and to affirmatively furthering fair housing

[5] Errata, p. 1E-3-123; *see also* Letter from David Zisser to Georgeanne White re: Fresno City Council's Denial of Fresno Quality Inn Homekey Project – Letter of Technical Assistance (Aug. 7, 2024), available at https://www.hcd.ca.gov/sites/default/files/docs/planning-and-community/HAU/fresno-hau-806-ta-080724.pdf (8/7/2024 HAU Letter)..
[6] 8/7/2024 HAU Letter, pp. 3-4.
[7] Errata, p. 1E-1-11.
[8] *See* 8/7/2024 HAU Letter, p. 3.

people with disabilities and people of color. HCD's technical assistance letter also noted that "the City Council's discussion of assumptions and stereotypes regarding homeless individuals raises further fair housing concerns."[9] And the City recently passed one of the most draconian anti-camping ordinances in the state, amending a prior version of the ordinance to remove language about making shelter and housing available to unsheltered individuals.[10] Punitive and carceral approaches to homelessness make it harder for unhoused people to access housing and services and are counter to the City's duty to affirmatively further fair housing.[11] However, the Errata does not analyze the camping ordinance, the anticipated impacts of the recent amendments, or actions the City can take to mitigate the discriminatory impacts of such policies on people with disabilities and people of color. The Housing Element should acknowledge that its current approach to homelessness–both in denying permanent supportive housing and in criminalizing unsheltered homelessness–disproportionately burdens and denies housing choice to people with disabilities and people of color and is, in turn, inconsistent with its duty to affirmatively further fair housing. It must also commit to programs that will result in meaningful policy change to reverse its discriminatory practices.

IV. Sites to Accommodate the RHNA

While the Errata includes amendments and additional information regarding pipeline projects and sites identified to accommodate the RHNA, multiple deficiencies remain, including:

- Program 17 (Surplus Public Land) remains inconsistent with the Surplus Land Act; e.g., it requires only 10% affordable units.[12]
- More and better information is needed to justify the City's projections regarding pipeline projects.
    - Lack of info re committed assistance for hotel/motel conversions. Such information is especially important given the City's recent rejection of Homekey funds for a project that would have converted a hotel into permanent supportive housing.
    - Ambiguous or conflicting info, e.g. re funding and affordability for Village at West Creek North.
- The Errata does not analyze the impact of restrictions on ground-floor residential uses on capacity projections in commercial and mixed use zones.[13]

[9] 8/7/2024 HAU Letter, p. 4.
[10] Ord. 2024-025.
[11] *See* HCD AFFH Guidance, pp. 68-70; *see also Statement by UCSF Benioff Homelessness and Housing Initiative Director Dr. Margot Kushel on the Supreme Court's Decision in City of Grants Pass v. Johnson* (June 28, 2024), available at https://homelessness.ucsf.edu/resources/press-release/BHHI-grants-pass-statement.
[12] Errata, p. 1E-1-23; *see also* 8/7/2024 Comment Letter, pp. 19-20.
[13] *See* 8/7/2024 Comment Letter, p. 8.

- The Errata does not add any analysis of existing residential, agricultural, and commercial uses on sites identified to accommodate the RHNA.[14] Notably, it relies on many sites–including for the development of lower-income housing–on sites with existing commercial uses along the Blackstone corridor, the City's main commercial corridor, without adequate information about the existing uses or analysis to support the City's assumption that the site will redevelop as housing.
- The Errata adds some information and analysis regarding large sites, but it still fails to comply with Government Code section 65583.2(c)(2)(B). While it includes examples of past projects developed on large sites, it lacks information about when those projects were developed, and about the development timelines and phasing for the entire site (as opposed to just the housing portion).[15]
- The Errata removes some publicly owned sites from the inventory but continues to rely on publicly owned sites with either (1) a lack of information to support the assumption that they will redevelop within the planning period or (2) information that indicates the sites will not be available during the planning period. For example, Table 1E-2-9 indicates that the City plans to use site 287 for tiny homes, "micro homes," and other uses during the planning period, which means it will not be available for permanent housing units.[16] (The description of the proposed project also raises questions about the City's plans to site interim housing for homeless individuals and/or disaster survivors on an identified brownfield.) It also continues to list sites owned by other government agencies without adequate information about those agencies' plans for the sites, existing uses, etc.
- The Errata continues to identify sites inconsistent with its duty to AFFH without adequate programs to combat the likelihood that development as projected on identified sites will further entrench existing patterns of racial and economic segregation.[17]

V. Relocation and Replacement Housing

Program 35 (Replacement Units) references replacement units for density bonus projects and on sites identified in sites inventory.[18] However, the City also needs to require replacement units *and* relocation benefits to displaced households consistent with SB 330/AB 1218. The Errata's description of its compliance with SB 330 does not include any discussion of that law's replacement and relocation requirements, nor any reference to AB 1218 (2023), which expanded SB 330's relocation and replacement housing requirements to nonresidential projects.[19] The Housing Element should describe the ways in which the City is (or is not) implementing these requirements currently and amend its programs accordingly. In addition to amending Program

[14] *See* 8/7/2024 Comment Letter, p. 9; HCD 2/1/2024 Findings, p. 5.
[15] *See also* 8/7/2024 Comment Letter, p. 13.
[16] Errata, p. 1E-2-47.
[17] *See* 8/7/2024 Comment Letter, p. 11.
[18] Errata, p. 1E-1-45.
[19] Errata, pp. 1E-3-115, 1E-4-43.

35, the City should amend Program 4 (Streamline Development Review Process) to include a commitment to incorporating replacement and relocation requirements into its application processes to ensure that it is not approving projects without the legally mandated relocation benefits and replacement units.

VI. Mobile Home Parks

As the Errata notes, mobile home parks represent an important source of affordable housing in Fresno. However, many mobile home residents are at risk of displacement due to rent increases and/or mobile home park closures. The City should strengthen Program 33 (Mobile Home Parks), including by committing to apply mobile home park zoning to existing mobile home parks to discourage mobile home park conversions and improvements to the City's mobile home rent control process to make it more accessible to residents–e.g., removal of the requirement that residents form a committee before opposing a rent increase.

VII. Community-identified programs that should be incorporated into the Housing Element

Through our collaboration with low-income residents, community members have identified the following programs and drafted examples that the City should incorporate into the Draft Housing Element:

- **Rent Stabilization and Just Cause Protection Ordinance**
    - **Objective**
        - Ensure the preservation of available affordable housing, and housing choices, and prevent the displacement of low-income residents and residents belonging to a protected class in R/ECAPs through the implementation of a Rent Stabilization and Just Cause Protection Ordinance
    - **Actions**
        - All material, information, and verbal public education, including outreach initiatives, will be provided in a variety of languages representative of Fresno including, but not limited to, Spanish, Hmong, and Punjabi.
        - By December 2025, the City will adopt a Rent Stabilization and Just Cause Protection Ordinance to protect tenants from unreasonable rent increases and unjust evictions.It will establish a rental registry that will be published no later than June 2025.
        - The City will develop the ordinance collaboratively with Fresno tenants, landlords, and community based organizations.

        - The City will make a diligent effort to engage Fresno tenants through outreach including but not limited to, canvassing apartment complexes. The city will host interactive convenings and workshops.
    - **Timelines**
        - By March 2025, The City will establish a community workgroup to develop a rent stabilization and just cause ordinance draft. The working group will meet on a monthly basis.
        - By August 2025, the City will release a draft ordinance for public review and announce the publication of the draft.
        - The City will adopt the ordinance no later than December 31, 2025.
    - **Funding**
        - Local Funds
    - **Responsibility**
        - Office of the City Attorney and Office of Community Affairs

- **<u>Inclusionary Zoning Ordinance</u>**
    - **Objective**
        - In line with its duty to AFFH, the city will secure affordable housing options for low-income and very low-income residents through the adoption and implementation of an Inclusionary Zoning Ordinance by December 2025. Once adopted, the City will promote the ordinance through multilingual educational material and community workshops.

    - **Actions**
        - The ordinance will be developed in accordance with the following guidelines
            - Apply to projects of 5 or more units
            - All new housing developments will set aside 20% of its units as affordable for households with an AMI of 50% or less in perpetuity.
            - As a compliance alternative, developers may pay an in-lieu fee that will then be used towards the development of affordable housing.
        - Following the adoption of the ordinance, the City will host annual workshops to inform developers of compliance requirements.

    - **Timelines**
        - Beginning in January 2025, the City will draft an Inclusionary Zoning Ordinance and adopt the Ordinance by November 2025.

        - By December 2025, the City will implement the ordinance and require Inclusionary Zoning for all new housing developments and inform developers of compliance requirements.
        - Beginning January 2026, the City will host annual workshops to inform the community of the program and initiate its monthly reports.
    - **Funding**
        - Local Funds
    - **Responsibility**
        - Planning and Development Department

- **<u>Program 19 - Homebuyer Assistance</u>**
    - **Objective**
        - In order to expand housing opportunities across Fresno, the City will commit to offering financial and technical assistance, as well as counseling services to assist low-income residents in purchasing a home.
    - **Actions**
        - The program will be promoted through City media outlets, community outreach, informative workshops, partnerships with local media outlets, neighborhood/homeowners associations, realtors' associations, homebuilders, lenders, Rotary, and Community Based Organizations. Targeted outreach and promotional efforts will occur in R/ECAP and extremely low and low-income households.
        - This program will be accessible to residents regardless of immigration status. This program will prioritize individuals and households with special needs.
        - The City's Housing and Community Development Division will offer the following support and assistance in the variety of languages representative of Fresno including, but not limited to, Spanish Hmong, and Punjabi:
            - **Technical assistance** - Guide applicants through the application process, offer technical support throughout the length of the program
            - **Financial assistance** - Offer up to $200,000 in loans, cover down payments and closing costs, zero interest fees, loan fees, or monthly payment fees, loan forgiveness after 15 years, and flexible payment plans calculated according to income at the time of application and adjusted based on changes in grantees income.
            - **Financial counseling services** - Intended to increase the beneficial impact of the program by preparing applicants to become strong financial candidates and offer support as grantees to help them adapt to the financial challenges of becoming homeowners.

- The City will apply to the state's CalHome Program and the Jose Serna, Jr. Farmworker Housing Grant to secure funding for the home buyer assistance program on an annual basis.
- The City will provide quarterly reports every year describing how many applicants were assisted, and a description of outreach efforts and the location of where grantees were able to find housing.
- The City will establish an oversight committee consisting of low-income residents to address residents' needs and ensure funding is secured for its intended purpose.

- **Timelines**
  - Beginning January 2025, the City will host two informative workshops every quarter and emphasize accessibility to extremely low-income and very low-income residents.
  - Beginning in January 2025, The City will perform strong community outreach to notify residents of the availability of the program targeting extremely low-income and very low-income residents.
  - Beginning January 2025, the City will begin accepting applications for the program.
  - Beginning June 2025, the City will release its first quarterly report.

- **Funding**
  - CalHome Program, Jose Serna, Jr. Farmworking Grant, Permanent Local Housing Allocation (PLHA), NAHREP (National Association of Hispanic Real Estate Professionals) Fresno, Federal Home Loan Bank (FHLBank) of San Francisco, Self-Help Enterprises, and Union Bank
    - Community Development Block Grant Program, HOME Investment Partnership Act Funds, Cal HFA, and California Self-Help Housing Program
- **Responsibility**
  - Planning and Development Office of Community Affairs, and nonprofit community development corporations.

- **<u>Program 22 - Housing Rehabilitation</u>**
  - **Objective**
    - With the goal of conserving affordable housing, preventing displacement, and cultivating thriving communities, the City of Fresno will assist households who on average have below-moderate incomes by connecting them to resources and services specialized in the rehabilitation and weatherization of their homes regardless of immigration status.

- **Actions**
  - The City will set aside 5% of its annual general fund revenue for home rehabilitation and weatherization grants and for the rehabilitation grants.
  - The program will be promoted through City media outlets, community outreach, informative workshops, and partnerships with local media outlets, neighborhood associations, and community benefit organizations.
  - Outreach and promotional efforts will occur in R/ECAP, targeting households who on average have extremely low to very low income, households of undocumented residents, homes with substandard living conditions, and households with special needs. All material will be made available in a variety of languages representative of Fresno including, but not limited to, Spanish Hmong, and Punjabi.
  - The City's Code Enforcement division will immediately refer moderate and below moderate-income homeowners in violation of the City's Housing code to the program and homeowners who do not seek out services will be listed as a priority for outreach efforts.
  - This program will prioritize rehabilitation for households with special needs, homes with damages that pose a serious health risk, and homes with damages that are likely to be exacerbated by weather and climate change.
  - To prevent future deterioration of substandard homes, the City will provide home weatherization services, including insulation and heat pumps as well as other cooling mechanisms, and prioritize these services for households with special needs such as the elderly, and individuals with disabilities or chronic health issues.
  - The City's Housing and Community Development Division will offer the following assistance to homeowners in a variety of languages representative of Fresno:
    - **Technical assistance** - Guide applicants through the application process and offer technical support throughout the length of the program.
    - **Referral assistance -** Connect applicants to resources and services based on the level of repair needed.
    - **Financial assistance -** Offer rehabilitation grants to homeowners with no fees on interest.
    - **Temporary Housing -** The City will provide Emergency Housing Vouchers for rehabilitation efforts that require the residents to vacate their homes.
  - The City will employ local licensed general and paint contractors and prioritize partnerships with contractors who predominantly employ or will

employ local residents including part-time jobs for youth for the duration of their participation in the program.

- The City will provide annual and quarterly reports describing how many homeowners were assisted with revitalization, how many local residents were employed, a description of outreach efforts including the location where they took place, and the amount of funding allocated from the general fund.

- **Timeline**
  - By March 2025, the City will notify the community via city media outlets, notify community benefit organizations, and update its website to promote the development of the Program.
  - Beginning in January 2025, the City will host two quarterly informative workshops. Half of the workshops will occur in an area accessible to residents residing in R/ECAP.
  - The City will begin outreach onemonth before every informative workshop by notifying Community Based Organizations, posting on social media, and canvassing R/ECAP.
  - By August 2025, the City will begin offering rehabilitation and weatherization services.
  - By February 2026, the City will release its first annual/quarterly report.
- **Funding**
  - General Fund revenue, CDBG program funds.
- **Implementation**
  - Planning and Development Department, Housing and Community Development Division, Office of Community Affairs, Code Enforcement Division

- **<u>Program 33 Mobile Home Parks</u>**
  - **Objective**
    - The City will prevent excessive rent increases for mobile home park residents, offer rehabilitation and weatherization services to homeowners regardless of immigration status, and assist in the revitalization and weatherization of mobile home parks, including, urban greening and secure pedestrian and public transportation routes. The City will preserve mobile home parks as a source of affordable housing and hold Mobile Home Park owners accountable for repeated code violations through fines that will fund mobile home park rehabilitation efforts.
  - **Actions**

- The City will finalize its 5th Cycle assessment of housing-related needs in mobile home parks, release it for public review and comment, and use this information to direct rehabilitation and weatherization efforts.
- Continue to support the Mobile Home Rent Review & Stabilization Commission. The City will evaluate potential changes to the rent review process to remove unnecessary barriers to mobile home park residents' participation in the process, including through the possible removal of the requirement that residents form a committee prior to participation.
- Provide annual notification to park owners about rent increase applications. Hold meetings at mobile home parks to explain the enforcement process.
- Maintain a list and map of mobile home parks in Fresno.
- Provide relevant information to interested mobile home park residents, owners, and non-profit organizations.
- Compile a list of resources and provide technical assistance to mobile home residents and park owners to facilitate the maintenance and preservation of mobile home parks.
- The City will enforce the California Mobile Home Park Act throughout the City.
- The City will set aside 2% of its annual general fund revenue for Mobile home rehabilitation and weatherization grants and for the rehabilitation of Mobile Home Parks.
- Funding generated from fines imposed on mobile home park owners for code violations will be prioritized for mobile homeowners whose homes are older than the maximum year requirement criteria of the City's Mobile Home Repair program and toward the revitalization and weatherization of Mobile Home parks.
- The City will apply to HCD's Manufactured Housing Opportunity & Revitalization Program (MORE).
- The City will assist with the replacement of mobile homes deemed irreparable.
- The program will be promoted through City media outlets, community outreach, place-based informative workshops, and partnerships with local media outlets, and community benefit organizations.
- Upon request by the homeowner, the City's Community Revitalization Division will assess the safety and integrity of the home and refer the homeowner to the program if deemed necessary.
- The City's Code Enforcement Division will immediately refer mobile homeowners in violation of the City's Housing Code to the program.

Homeowners who do not seek out services will be listed as a priority for outreach efforts.

- This program will prioritize rehabilitation for households with special needs, homes with damages that pose a serious health risk, and homes with damages that are likely to be exacerbated by weather and climate change.
- To prevent the future deterioration of outdated mobile homes, the city will provide mobile home weatherization services, including insulation and non-evaporative cooling systems, and prioritize these services for households with special needs such as the elderly, and individuals with disabilities or chronic health issues.
- The City will offer the following assistance to homeowners in a variety of languages representative of Fresno including, but not limited to, Spanish Hmong, and Punjabi:
    - **Technical assistance** - Guide home-owner and landlord applicants through the application process and offer technical support throughout the length of the program.
    - **Referral assistance -** Connect homeowners and landlords to resources and services based on level of repair needed.
    - **Financial assistance -** Offer rehabilitation grants to homeowners with no fees on interest.
    - **Temporary Housing -** The City will provide Emergency Housing Vouchers for rehabilitation efforts that require the family to vacate the home.
- The City will employ local licensed general contractors and prioritize partnerships with contractors who predominantly employ or will employ local residents including part-time jobs for youth for the duration of their participation in the program.
- The City will provide annual and quarterly reports describing how many homeowners were assisted, the types of revitalization and weatherization services provided for homeowners and mobile home parks, how many local residents were employed, a description of outreach efforts including the location where they took place, and a breakdown of funding generated from fines imposed on landlords, and the amount of funding allocated from the general fund.
- Evaluate policy changes and funding sources to discourage mobile home park closures and mitigate the impacts of such closures on residents and the community. Possible policy changes include applying mobile home park zoning to existing mobile home parks to discourage redevelopment of those parks for other uses.

- **Timeline**
  - Beginning January 2025, the City will notify the community via City media outlets, notify community benefit organizations, and update its website to promote the development of the Program.
  - By March 2025, the City will begin the process of completing its 5th Cycle assessment of housing-related needs in mobile home parks.
  - Beginning in March 2025, the City will host informative workshops at each mobile home park twice a year.
  - The City will begin outreach one month before every informative workshop by notifying community benefit organizations, posting on social media, and canvassing R/ECAP.
  - By September 2025, the City will begin offering rehabilitation and weatherization services.
  - By January 2026, the City will release its first annual/quarterly report.
  - By March 2026, the City will release its 5th Cycle assessment of housing-related needs in mobile home parks.
  - By January 2026, the City will have rehabilitated 25% of owner-occupied mobile homes and Mobile Home parks.
  - By a date certain within the planning period, present ordinance options to the City Council for preserving mobile home parks.
  - By a date certain within the planning period, evaluate and recommend changes to improve mobile home park residents' ability to access the rent review process.
- **Funding**
  - General Fund revenue, rehabilitated home sale revenue, CDBG program funds, Manufactured Housing Opportunity & Revitalization Program (MORE).
- **Responsibility**
  - Planning and Development Department, Housing and Community Development Division, Office of Community Affairs, Community Revitalization Division, Code Enforcement Division

VIII. Conclusion

Thank you for considering our comments. We welcome the opportunity to continue collaborating on the City of Fresno's Housing Element update to ensure the City complies with state law and is committed to meeting the housing needs of all residents. The City of Fresno is

not exempt from the State's ongoing housing crisis and must abide by its duty to Affirmatively Further Fair housing and remain committed to securing safe and affordable housing.

Respectfully,

/s/
Emmanuel Agraz-Torres, Policy Advocate
Leadership Counsel for Justice and Accountability
/s/
Melissa A. Morris, Staff Attorney
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Rebecca Pope

From: Brooke Frost <brookefrost@live.com>
Sent: Thursday, August 8, 2024 9:34 AM
To: HousingElement
Subject: Comment on Fresno Housing Element

External Email: Use caution with links and attachments

Hello,
Below are some comments on the housing element. I am a resident in southeast Fresno who is not a housing expert.

Program 21 - Advocate for Repeal of Article 34 - this references a ballot measure that occurred in March 2024, shouldn't the result status be included and the effect of whether the City will place its own measure on the ballot in a subsequent election? I realize this was first prepared before the vote, but since it is being resubmitted in August 2024, shouldn't it be updated?

Vacancy rate math adds up to more than 100%. You say 95.5% are occupied and 5.5% are vacant. Shouldn't it be 4.5% vacant?

Overpayment seems to not include any reference to increases after 2020. There have been significant housing cost increases since COVID and that is not reflected in this section. How can it be included? It seems the same is true for sub-standard housing. What seems to be happening is eviction to improve substandard conditions. But there is nowhere to go that is affordable. How is this to be reflected in the housing element?

In general, I don't see any reference to encouraging outreach for developers to use middle housing (duplexes, cottages/courtyards, 4 plexes) for infill in residential areas that are affordable and fit in better in residential areas. Everything doesn't need to be 3 or 4 story apartments.

Thank you.

Brooke Frost
559-288-4082

August 7, 2024

Mayor Jerry Dyer
Fresno City Councilmembers
Michelle Zumwalt, Planning and Development Department
2600 Fresno Street, Room 3065
Fresno, CA 93721

Sent via email: housingelement@fresno.gov

RE: City of Fresno Draft 6th Cycle Housing Element

Dear Mayor Dyer, Councilmembers, and Ms. Zumwalt:

Leadership Counsel for Justice and Accountability ("LCJA") and Public Interest Law Project ("PILP") write in collaboration with local community residents and the undersigned organizations to submit this comment letter on the City of Fresno's second Housing Element Draft 2023-2031. LCJA and the undersigned organizations work alongside the most impacted communities to advocate for sound policy and eradicate injustice to secure equal access to opportunity regardless of wealth, race, income, and place. We advocate for policy and practice changes to meet the housing needs of all residents in the City of Fresno, especially low-income residents and those with special housing needs, and to overcome fair housing disparities that impact low-income communities. Residents with whom we partner experience high rates of cost burden, escalating housing costs, reside in unsafe and unsanitary rental housing units, experience displacement risks, and are impacted by disparities in access to opportunity, including a lack of access to a healthy environment and public and private investment in critical infrastructure, services, and amenities.

Founded in 1996, PILP provides crucial litigation and advocacy support to local legal services and public interest programs throughout California. For more than two decades, PILP has fought for affordable and fair housing, access to public benefits, homelessness prevention,

and civil rights in partnership with low income communities, communities of color and legal services organizations throughout California. In the context of the Housing Element Law, PILP has been instrumental in the passage of legislation to strengthen that law, which has included the review and comment upon thousands of housing elements throughout the state to ensure access to affordable housing opportunities for California's residents who reside in lower-income communities.

The City of Fresno's 6th Cycle Housing Element Update presents a critical opportunity for the City to identify and address long-standing, wide-ranging, and severe housing needs and fair housing disparities that impact residents, disadvantaged unincorporated communities, and racially and ethnically concentrated areas of poverty ("R/ECAPs"), in particular, the Southwest, South Central and Southeast areas. Unfortunately, the Draft has failed to adequately address these disparities; therefore, we are providing the following comments that highlight further steps and actions the City must take to meet State Housing Element Law requirements. (Gov. Code § 65583 *et. seq*.).[1] We recognize the City made improvements in the second Draft, but we believe further revisions are necessary to substantially comply with Housing Element law. In particular, the City needs to continue to and further engage communities that have been historically left out of previous Housing Element Cycles, adopt and implement enforceable policies and programs with discrete timelines to meet the housing needs of all residents, and abide by its duty to affirmatively further fair housing ("AFFH"). (Gov. Code § 8899.50).

I. Failure to Demonstrate A Diligent Effort to Solicit and Incorporate Input from All Economic Segments of the Community and Protected Classes

As stated in our previous letters, and further reinforced by HCD in their February 1, 2024 letter under section E. Public Participation of their findings, the City must make a diligent effort to engage the community during the housing element revision process, including the organizations that represent low-income and special needs households, and describe how it incorporated community feedback into its Draft. Lastly, the City must make information readily available, during the development of the Housing Element. This includes the revision process.

Between February and July 2024, we attempted to communicate with the City to understand how and when it would engage community residents in their Draft revision process. Despite our multiple efforts, the City demonstrated an unwillingness to offer information. This greatly inhibited residents' ability to contribute to the development of the Draft; including two visually-impaired residents who requested large-font hard copies of the revised Draft to review and provide comments within the anticipated 7 day review period. Furthermore, the City did inform LCJA that the revised Draft had been posted to its website and was available for public comment and review until 5:00 pm on August 7, 2024; however, they neglected to include the

[1] Hereafter all Code sections refer to the California Government Code, unless otherwise noted.

deadline on the Housing Element webpage, thereby, failing to disclose limited review period to the public. By neglecting to make information readily available, and their lack of making a diligent effort to engage the community, or explain where it incorporated, or did not incorporate community feedback and public comments into the revised Draft, the City demonstrates that it fails to substantially comply with State law.

II. Failure to Adequately Analyze Housing Constraints

A. Governmental Constraints to Housing Development

While the City did address some of the concerns related to their analysis of governmental constraints, there still remains an incomplete analysis. As a reminder the City is required to have

> "[a]n analysis of potential and actual governmental constraints upon the maintenance, improvement, or development of housing for all income levels,. . . and for persons with disabilities. . . including land use controls, building codes and their enforcement, site improvements, fees and other exactions required of developers, local processing and permit procedures, and any locally adopted ordinances that directly impact the cost and supply of residential development. The analysis shall also demonstrate local efforts to remove governmental constraints that hinder the locality from meeting its share of the regional housing need. . . and from meeting the need for housing for persons with disabilities, supportive housing, transitional housing, and emergency shelters." (Gov. Code § 65583(A)(5)).

In our previous comment letters, we uplifted the need to identify constraints to the development of housing affordable to households at different income levels, as well as possible constraints to the development and maintenance of a variety of types of housing, unfortunately this recent Draft continues to fail in adequately analyzing these constraints.

1. Development Standards

"The housing element must identify all relevant land-use controls, discuss impacts on the cost and supply of housing, and evaluate the cumulative impacts of standards, including whether development standards impede the ability to achieve maximum allowable densities."[2] The City added a Table 1E-4.6 which analyzes multi-family zone requirements for prototype site development and helps identify the ability to achieve maximum densities in the City's multi-family zones. Unfortunately, this analysis is insufficient and does not address our previous concerns regarding constraints associated with the widespread availability of single family

[2] HCD, Building Blocks, Land Use Controls, available at https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks/land-use-controls.

zoning and the limited availability of high density zoned sites. The city continues to allow by-right single-family units more than multi-family affordable housing developments. Additionally, the City still permits single family uses by-right in many of the zones identified for increased high-density development: RM-1, NMX, CMX, RMX, CMS, CR, DTN, DTG. But multi-family units are not allowed in RS-1, RS-2, or RS-3 areas, despite the large majority of the City being zoned one of these zones, and where many high resource areas have developed. Duplexes are similarly constrained, they are excluded from RS-1, RS-2, RS-3, RS-4, and only allowed through conditional use permit in R-5.

2. *Single Room Occupancy (SRO) Units, Emergency Shelters, Supportive Housing*

Although we appreciate the City's amendment to the Single Room Occupancy (SRO) section to remove the "current limit of 15 guests in SRO units, as well as changing SRO to permitted use in RM-1, RM-2, RM-3, NMX, CMX, and RMX, and evaluating objective design standards for SROs to ensure that units are maintained and safe for all residents long term;" additional analysis must be done for emergency shelters and supportive housing. The City has a significant homeless population and a serious dearth of housing and shelter options to serve that population; it must analyze the constraints to building additional shelters to ensure that the unhoused population has access to housing. Little is said in response to supportive housing and whether it is allowed in any zone where multi-unit or mixed use development is permitted.

3. *Parking*

The Draft had previously amended the Development Code to remove parking minimums within a half mile of public transit, consistent with AB 2097. In the revised Draft the City added an action to reduce the parking standard for Residential Care, General. But once again failed to analyze whether its parking requirements act as a constraint on housing development, especially in downtown and along transit corridors. Parking requirements increase the cost of housing.[3] The Draft states it "determines the required number of parking spaces based on the type and size of the residential unit and has found the required parking spaces to be necessary to accommodate the number of vehicles typically associated with each residence."[4] The analysis ignores principles of induced demand and downstream effects of entrenching car-centric land use. The Draft implicitly acknowledges that parking increases costs and may not be critical as it allows waivers for parking requirements in affordable housing developments and other transit-friendly areas.[5] The ad hoc basis of reduced parking requirements introduces uncertainty which can increase the overall cost and time delays in housing development. Once again, the City failed to

[3] Green Trip. *Parking Database:* http://database.greentrip.org/.
[4] Fresno Multi-Jurisdictional Housing Element July 2023, Appendix 1E: City of Fresno, 1E-4-10
[5] Fresno Multi-Jurisdictional Housing Element July 2023, Appendix 1E: City of Fresno, 1E-4-10

include a program that would identify steps to remove this constraint, particularly in the development of affordable housing.

4. Risk Analysis and Distribution of Affordable Housing

Additionally, we want to reiterate the Draft's analysis of at-risk housing is incomplete and under-analyzes the risks to publicly assisted affordable housing and its distribution. The Draft identified 695 units at risk of conversion to uses other than low-income residential within 10 years from the housing element adoption deadline. Although the City considered the cost of replacing the at-risk units as required under §65583(a)(8), it failed to examine which pathway would be most appropriate for the City and what constraints, if any, would be associated with the pathway chosen.

Once again, we urge the City to analyze the lack of tenant protections, such as source of income discrimination outreach and education, rent stabilization, and just cause protections, and how they may operate as a constraint on the maintenance of housing available to lower income people and facilitate the displacement of lower income renters. The lack of these protections should be analyzed as a constraint on the maintenance of housing under Government Code section 65583(a)(5).

5. Accela

In Table 1E-2.3, the Draft identifies Accela, the City's land management software, as a barrier to the timely completion of multiple projects on which it is relying to accommodate its RHNA.[6] The Draft should describe how Accela is creating barriers to the completion of new housing development–especially affordable development–analyze these barriers as constraints, and, if appropriate, add program language to reduce or mitigate any constraints caused by the system.

B. Non-Governmental Constraints to Housing Development

In addition to analyzing governmental constraints, the Draft must also analyze the potential and actual non-governmental constraints upon the maintenance, improvement, or development of housing for all income levels. Gov't Code § 65583(a)(6). Unfortunately, the second Draft continues to exclude such an analysis even though public comments have been submitted in response to this specific issue. The Draft failed to consider the effect of market forces, availability of financing, environmental concerns, and NIMBY opposition.

[6] Fresno Multi-Jurisdictional Housing Element July 2023, Appendix 1E: City of Fresno, 1E-2-10 to 1E-2-11.

1. NIMBY Opposition

The Draft must include an analysis of NIMBY opposition to housing development. As a largely sprawling suburban City, Fresno is prone to local opposition to increased density from existing single-family homeowners that have preconceived ideas of the impacts of increased density on their neighborhoods. Further, the zoning code requires conditional use permits for duplexes and multi-family housing in some areas, making them especially susceptible to opposition and defeat from NIMBY residents.

NIMBY opposition is all too common and a pervasive issue when building multi-family projects in high resourced areas. The latest example: on July 25, 2024, the City Council voted (4-3) to uphold the Planning Commission's vote to reject the development permit application for a market-rate housing complex at the northeast corner of West Herndon and North Prospect Avenues (North of the City of Fresno). Even though this project is market-rate without any subsidy for people who cannot afford rent, comments were made that perpetuate stereotypes that have been mostly disproven— such as decreasing property value, increased crime rates and worsening traffic.[7] This is just one example of how pervasive NIMBY-ism is in the City of Fresno and thus a significant reason to complete a full analysis of this constraint.

2. Environmental Concerns

Once again, the Draft failed to consider environmental constraints as part of its analysis under Gov't Code § 65583(a)(6). Environmental constraints may include limitations to water supply, nearby pollution, or infrastructure development. Per our previous comment letters, we have noted that the City of Fresno relies heavily on groundwater and surface water. As climate change makes water availability less predictable the City must analyze how an increased population and land use will affect water availability and whether water availability will eventually constrain growth. Additionally, the City must consider the infrastructure requirements of delivering water to a denser population. For example, the City estimates that downtown Fresno, where a large portion of new housing development is projected, currently requires significant water and wastewater infrastructure upgrades.

Again, we must reiterate the fact that the Draft failed to consider industrial and polluting industries' effect on future housing development. The City must also analyze as a constraint the proliferation of warehouses and other industrial uses in and around the City, particularly in South Fresno. These industrial and warehouse projects come with an enormous increase in vehicle traffic and worsen already very poor air quality. They also result in light, sound, and vibration pollution. Many of these projects are being approved next to residential development with no buffer, driving down housing value, and worsening housing conditions. The City must consider

[7] Parsons, R. (2024, May 19). A Big Housing Project Gets Rejected. *Fresnoland.* https://fresnoland.org/newsletter/a-big-housing-project-gets-rejected/

warehouse and industrial use proliferation as a constraint, and identify impacts to residents. The City must then commit to adopting strong programs and policies with enforceable timelines to address the constraint.

Additionally, the City of Fresno has evolved as a car dependent City surrounded by heavy industry and highways. Therefore, future housing development will need to carefully consider placement and mitigation measures to avoid perpetuating environmental inequity.

III. Further Revisions and Analysis are needed to determine if the City's Draft Includes Adequate Sites

1. Entitled and Permitted Units

The Draft adds information about the entitled and permitted units that the City seeks to credit against its RHNA obligation, but the information provided for multiple projects still remains inadequate to comply with the requirements of Housing Element Law.

Hotel/Motel Conversions—the Draft relies on four hotel/motel conversions to accommodate 211 units of its lower-income RHNA. However, the Draft is missing the requisite information and program language to claim credit for these units.[8] Government Code 65583.1(c)(2)(D) allows credit for such units, but they must be converted with committed assistance from the City and be made available to people experiencing homelessness, and the Housing Element must include a program for the conversion(s). Table 1E.2-3 should be amended to specify the committed assistance *from the City* for each of these projects and to clarify whether each of them will be made available to people experiencing homelessness. Additionally, the City should add concrete program language to **Program 36 (Homeless Assistance)** to specify the committed assistance and other actions on the part of the City to facilitate hotel conversions and to ensure that the converted units remain safe and habitable over time. Additionally, for project P-23 (San Joaquin Hotel), Table 1E.23 does not describe the status of entitlement review for the 59 units on which the Draft relies; nor does it provide any information about build-out, phasing, or projected rents.

City-Caused Barriers to Completion—The City relies on project P-12, Fresno Rescue Mission RTC 2, to accommodate 49 units of its low-income RHNA. However, the Draft acknowledges that there is no phasing plan for the project and no expected completion date—there is no indication that this project can be completed during the planning period. Additionally, the Draft identifies "having difficulties with affordable housing contracts with the City" as a barrier to completion.[9] The Draft should describe the "difficulties" and analyze the

[8] Fresno Multi-Jurisdictional Housing Element July 2023, Appendix 1E: City of Fresno, 1E-2-5, 1E-2-9 to 1E-2-11
[9] Fresno Multi-Jurisdictional Housing Element July 2023, Appendix 1E: City of Fresno, 1E-2-8.

City's role in creating or ameliorating project delays. Such analysis should inform program language to expedite the funding and development of affordable units.

Unsupported Affordability Assumptions for Moderate-Income Units—the Draft still lacks adequate information and analysis to support its assumptions regarding the affordability of market-rate units. Table 1E-2.2 does not include any information about the unit type, number, or density of rental units in projects it lists as examples. Table 1E-2.3 does not include information about the expected tenure of many of the projects, so it is unclear whether the units will be rental or for-sale; the draft does not provide any indication that new market-rate for-sale units will be sold at prices affordable to moderate-income households. By way of example, Table 1E-2.3 acknowledges that the City is "not sure of rents" for project P-8, a market-rate *gated* duplex community but nonetheless has switched its affordability projection since the prior draft from above-moderate to moderate-income without any justification. The City should provide additional information and analysis to ensure that its assumptions regarding the affordability of market-rate units are supported.

Ambiguous Entries—Several entries in Table 1E-2.3 include ambiguous or conflicting information about project timelines and projected affordability. For example, for project P-1, the Village at West Creek North, the Table identifies funding sources but then indicates that the "challenge is getting funded" and that the affordability levels "will be dictated by funding source." It's also unclear if the project is one development or multiple developments. This lack of clarity makes it difficult to assess whether the planned units will be available at the projected affordability levels during the planning period.

The City should provide additional information and analysis regarding recent and pending developments that it seeks to credit against its RHNA. Where there is not adequate information to support projections that a project will develop at a particular affordability level during the planning period, that project should be removed from the list, and the site inventory should be adjusted accordingly.

2. Unsupported Capacity Projections

The Draft adds information about sites in zones that allow nonresidential development–including 100% nonresidential development–but it still lacks adequate information and analysis to support its capacity projections, especially with respect to affordable development. For example, while the Draft notes that the City recently removed the absolute prohibition of ground-floor residential development in mixed use zones to facilitate the development of lower-income housing, it notes that "all five [commercial and mixed use] zones have some level of restrictions on ground floor residential uses in order to activate the sidewalk."[10] All of the pipeline projects listed in Table 1E.2-3 that have ground-floor

[10] Fresno Multi-Jurisdictional Housing Element July 2023, Appendix 1E: City of Fresno, 1E-2-18.

nonresidential uses are market-rate projects. But the Draft does not indicate whether or not the sites identified in commercial or mixed use zones prohibit residential uses on the ground floor, nor does it analyze ground-floor restrictions as a potential constraint to affordable development.

Similarly, the Draft adds information about which commercial and mixed-use zones allow 100 percent non-residential development, but it does not describe whether the sites identified to accommodate the RHNA allow 100 percent non-residential development, nor does it break down past mixed-use development trends by zone. Draft, 1E-2.18 to 1E-2.19. While the summary table of "Project Examples" has been amended to cover 2018-2023 instead of 2018-2020, the Draft does not provide information about the projects themselves. It is therefore impossible to assess whether the capacity projections are supported by past and current development trends.

3. Non-Vacant Sites

The City continues to rely on non-vacant sites with a variety of uses—including residential, agricultural, parking lots, commercial buildings, and at least one "trucking" use--to accommodate its RHNA without the requisite analysis. The Draft adds examples of past development on sites with similar prior uses, but it does not include "an analysis of additional representative sites from the sites inventory" or "analyze recent development trends."[11] It does not include any site-specific information to support its assumptions that existing uses will discontinue or that owners are interested in redevelopment. It also does not analyze any potentially negative impacts of replacing existing uses with new housing, including potential displacement of lower-income households caused by the demolition of existing, unspecified "residential" uses; the health and environmental justice impacts of housing development on sites with current or recent commercial, industrial, or "trucking" uses (e.g., site 823); or the loss of apparently active agricultural uses (e.g., site 2434, agricultural and farm stand).

4. Publicly Owned Sites

The City continues to rely on government-owned sites to accommodate a significant portion of its RHNA. Some of these are owned by the City and its Redevelopment Successor Agency, while others are owned by other government entities. The Draft does not describe any communications with the other government entities to gauge their interest in or ability to redevelop the sites—many of which have existing uses—with housing. It does not "discuss the status, remaining steps to be available for development and any known barriers to development in the planning period including leases for existing uses or relocation of existing uses."[12] More information and analysis is needed to support the City's assumptions regarding these sites.

[11] HCD 2/1/2024 Findings, p. 5.
[12] HCD 2/1/2024 Findings, p. 5.

With respect to City-owned properties, the City should strengthen **Program 17 (Surplus Public Lands)** to describe, not only how it will comply with the Surplus Land Act, but also proactive steps it will take to solicit and support 100 percent affordable projects on City and Successor Agency sites during the planning period.

5. Large Sites

The Draft adds further discussion of large sites but still fails to adequately support its projections for sites over 10 acres.[13] The Draft provides examples of prior developments on large sites, but it is lacking information critical to understanding whether these examples support the City's assumptions regarding large site development. For example, it does not describe additional uses included in the project, timeline and phasing, or the percentage of the total site area that developed as residential v. commercial. Accordingly, the 60% residential assumption applied to large sites is not supported, nor is the assumption that units could be built within the planning period. Further, just comparing overall residential densities projected for identified large sites to overall residential densities for the large site examples indicates that the City is projecting generally higher densities for the sites than were realized in past projects, without explanation or justification.[14] The City should provide additional information and analysis to support its projections, or it should revise its projections downward. Because the Draft relies so heavily on large sites to accommodate its lower-income RHNA, the City should revise **Program 5 (Large and Small Sites)** to adopt incentives for affordable development on large sites, rather than deferring the consideration of such incentives to a later date.

6. Environmental Constraints

Both community groups and HCD commented on the prior Draft's lack of analysis regarding environmental constraints to development of identified sites. The current Draft removes sites within Zones 1-4 of the new Airport Influence Area for Fresno-Chandler Executive Airport and indicates which sites are within the 100-year FEMA floodplain but does not provide any additional site-specific information regarding "shape, access, contamination, property conditions, easements, Williamson Act contracts, conservation easements, overlays and airport and military compatibility."[15] It does not discuss the impact of adjacent freeways, industrial uses, or agriculture on site conditions, even though many identified sites have existing agricultural or commercial uses, and at least one has a highway on/off ramp.[16] The Draft acknowledges the disproportionately severe environmental health conditions in the Southwest Fresno Specific Plan and Downtown areas, where the Draft identifies the bulk of sites for new housing, lower-income housing in particular.[17] However, this recognition did not prompt a reevaluation of sites nor commitments to

[13] *See* Gov. Code § 65583.2(c)(2)(B).
[14] *See* Fresno Multi-Jurisdictional Housing Element July 2023, Appendix 1E: City of Fresno, 1E-2-54 to 1E-2-61.
[15] HCD 2/1/2024 Findings, p. 5.
[16] *See* Fresno Multi-Jurisdictional Housing Element July 2023, Appendix 1E: City of Fresno, 1E-7-47.
[17] Fresno Multi-Jurisdictional Housing Element July 2023, Appendix 1E: City of Fresno, 1E-3-131.

place-based strategies to mitigate environmental hazard on or near identified sites. The City should review the site inventory, informed by community input, and revise as necessary to address environmental justice concerns with site identification. It should also commit to concrete actions to address environmental hazards in neighborhoods with existing and planned lower-income housing.

7. Site Concentration and AFFH

The housing element must identify sites "throughout the community," consistent with the duty to affirmatively further fair housing.[18] The Draft does not do so, instead acknowledging: "The distribution of sites across the city displays a concentration of lower-income housing in areas like Downtown and the West Area, while other areas like McLane and Woodward Park have a higher proportion of moderate and above moderate income housing, reflecting an unequal distribution of housing capacity across the city. This has the potential to exacerbate fair housing issues in Fresno by providing more capacity for lower-income housing in disproportionately impacted communities."[19] In other words, the Draft admits that the City's selection of sites for new development during the planning period is inconsistent with its duty to affirmatively further fair housing.[20] In making this admission, the Draft references, in general terms, policies and actions elsewhere in the document, but it does not identify any specific program that will mitigate the acknowledged segregative impacts of the City's chosen site distribution.[21] HCD's February 1, 2024, findings instructed the City to "add or modify goals and actions, specifically increasing housing mobility options and housing opportunities in high-opportunity areas."[22] However, the Draft's programs to address these and other fair housing issues remain inadequate, as discussed in greater detail below. We strongly encourage the City to amend the Draft to include programs that will identify different sites, and directly invest in infrastructure in low-income neighborhoods.[23]

8. Electronic Sites Inventory

As noted in HCD's February 1, 2024, findings, the City must utilize HCD's electronic sites inventory, but the current Draft does not. We encourage the City to create an electronic site inventory as soon as possible for ease of review by both HCD and community members.

IV. The Assessment of Fair Housing Fails to Comply with Section 65583(c)(10)

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[18] Gov. Code § 65583.2(a).
[19] Fresno Multi-Jurisdictional Housing Element July 2023, Appendix 1E: City of Fresno, 1E-3-127.
[20] *See* Gov. Code § 8899.50(b)(1) ("A public agency shall administer its programs and activities relating to housing and community development in a manner to affirmatively further fair housing, and take no action that is materially inconsistent with its obligation to affirmatively further fair housing.")
[21] Fresno Multi-Jurisdictional Housing Element July 2023, Appendix 1E: City of Fresno, 1E-3-127.
[22] HCD 2/1/2024 Findings, p. 3.
[23] https://www.transformfresno.com/wp-content/uploads/2021/06/transform-fresno-here-to-stay-report-english.pdf

Government Code section 65583(c)(10)(A) requires that the Housing Element include an analysis of available federal, state, and local data and knowledge to identify integration and segregation patterns and trends; as well as Racially or Ethnically Concentrated Areas of Poverty (R/ECAP) and Racially or Ethnically Concentrated Areas of Affluence (R/ECAA). A complete assessment must identify key issues and prioritize contributing factors to fair housing issues; it must also point to the clearest fair housing issue trends and patterns within the jurisdiction as well as be detailed and comprehensive enough to develop strong actions and programs that will overcome and undo the identified fair housing issues. See AFFH Guidance, pp. 25.

Although we appreciate the City adding data, some historical context, and descriptions of the policies that have contributed to the formation of Racially and Ethnically Concentrated Areas of Poverty (R/ECAPs) and Racially or Ethnically Concentrated Areas of Affluence (RCAAs), the Assessment of Fair Housing (AFH) continues to fall short. It lacks an in depth analysis of and fails to incorporate public input as necessary to address the requirements set forth in Section 65583(c)(10) and does not achieve the requirement to ensure that the City AFFHs through its housing element.

A. Integration and Segregation and R/ECAP and Concentrated Area of Affluence Analyses Lack Required Detail

In our previous comment letters, we outline the gaps that render the AFH analysis incomplete (please see attachment A) such as failure to provide any data or analyze integration and segregation patterns for racial groups other than Hispanic/Latinos; failure to accurately or thoroughly analyze distribution of low- and high-income households across Fresno; the AFH's analysis of R/ECAPs and RCAAs fails to address "public participation, past policies, practices, [and] investments" as required. HCD Guidance, p. 33. Although the current Draft was amended on page 1E-3-27 to include bullet points outlining the policies and historical background that contributed to the creation of R/ECAPs it did not include an evaluation or analysis on why certain ethnicities or races live in certain areas or which past policies or practices led South Fresno to have a higher concentration of low-income households or households that are predominantly Hispanic/Latino and/or African American. Reports have shown that "the cultural evolution of resident identities and land-use purposes in Fresno includes a series of hostile land acquisitions imposed on Indigenous Americans, forced labor exploitation of Black farmers, unjust labor practices toward Brown migrants, and the socio-economic alienation of Hmong residents."[24]

Similarly, the RCAAs section which is on page 1E-3-31 was only amended to include additional areas that are considered affluent such as North and Northeast Fresno neighborhoods

[24] Brown, B., Heer, N., Love, N., Pollard, K., Thomas, D. (2021, June 9). Here To Stay: A Policy-Based Blueprint For Displacement Avoidance in Fresno. *Thrivance Group*. https://www.transformfresno.com/wp-content/uploads/2021/06/transform-fresno-here-to-stay-report-english.pdf

and McLane community area. Once again it fails to include an in-depth analysis of how and why these areas are high-resourced and more affluent, as well as the policies and programs that have led to creating and building opportunities. It goes on to include a list of characteristics and a list of programs that will promote inclusivity, affordability, and diversity in RCAAs. But without an adequate analysis of RCAAs and R/ECAPs, these programs will continue to fall short and therefore fail to comply with Government Code section 65583(c)(10)(A)(ii).

B. Incomplete Analysis of Disproportionate Housing Needs Based on Race, Ethnicity, Familial Status, Disability, and Income

The analysis of disproportionate housing needs must analyze needs relating to cost burden, overcrowding, substandard housing, homelessness and other factors for protected characteristics, including at least race and ethnicity, familial status, persons with disabilities, and income. § 65583(c)(10)(A)(ii); AFFH Guidance, p. 39. The requirement to analyze disproportionate housing needs is fundamental to achieving the purpose of the AFH to ensure that the housing element affirmatively further fair housing by identifying disparities impacting protected classes which have been subject to historic discrimination, describes the factors contributing to those disparities, and adopts meaningful actions that overcome patterns of segregation and address disparities in housing needs and opportunity for protected classes. Unfortunately, this recent Draft failed to satisfy this requirement once again.

In our previous letters (see attachment A), we made recommendations to include any information about the separate occurrence of overcrowding, cost burden, and substandard housing conditions based on race or ethnicity and provide any information at all about how these factors disproportionately impact Fresno residents based on familial status and disability. We also recommended that the Draft include information relating to familial status. We strongly urge the City to include information that reflects "local knowledge" or public input, which would strengthen the analysis with details about specific housing needs within the categories identified above and the scale of those needs in relation to others. Again, the City must supplement its disproportionate needs analysis to include the required demographic information and revise the AFH further to ensure its contributing factors and meaningful actions reflect that information.

The Draft acknowledges that homelessness in Fresno disproportionately impacts people of color–in particular Black residents of the City–and people with disabilities. However, it does not analyze the City's role in causing the segregation and forced displacement of its unhoused residents. The City is in the process of amending sections 10-1703(a), 10-1707, 10-2101, 10-2204, 10-2205 of the Fresno Municipal Code, Relating to the Prohibition of Encampments in

Public Places, with a second reading of the ordinance scheduled for August 15, 2024.[25] The purpose of the ordinance is the increased criminalization of unsheltered homelessness within the City, and it explicitly removes any requirement that the City ensure that shelter is available before citing, arresting, or displacing unsheltered individuals from public space. Such criminalization makes it harder for unhoused people to access housing, shelter, employment, medical care, and other services. The Housing Element must analyze these practices, including the disproportionate impact of these practices on people with disabilities and people of color, and it must include programs to ensure that its law enforcement and policing practices are not creating or perpetuating "disparities in access to opportunity." HCD AFFH Guidance, 69.

C. Incomplete Analysis of Displacement Risks

Although we appreciate the amendments in the Draft identifying tracts that are assigned the different levels of displacement, on page 1E-3-82, and a note stating that concentrated areas of poverty, lower medium income neighborhoods with greater populations of color and larger proportion of renter households are most sensitive to displacement, the Draft has once again failed to evaluate and analyze the impact displacement has on R/ECAP and protected classes and therefore has failed to incorporate meaningful policies and programs that will protect residents. The AFH's displacement risk analysis falls short by failing to consider other relevant information relating to existing and potential housing cost pressures confronting low-income residents, residents of color, and other protected classes, as well as significant displacement risks associated with tenant protection limitations, City land use policies and practices, environmental hazards, and climate change. A complete displacement risk analysis must consider these and other relevant factors. See AFFH Guidance, pp. 40-43.

Additionally, we are extremely concerned that the Draft has removed the displacement risk assessment regarding climate disaster.

> The risk of climate disaster can also put pressure on lower income communities. South Fresno neighborhoods have been impacted by a series of fires at warehouse, recycling, and other industrial facilities that have occurred during the increasing number of high and extreme-heat days over the past five years. Potentially toxic smoke from these fires has at times densely concentrated in South Fresno neighborhoods, which can make breathing difficult and unsafe for residents even within their homes with windows closed. pg. 1E-3-82.

As mentioned in our previous comment letters (see attachment A), the AFH's Displacement Risk section should be revised to consider displacement risks associated with environmental hazards,

[25] MCC § 10-1703(a). Retrieved from: https://fresno.legistar.com/View.ashx?M=F&ID=13187124&GUID=01FAFD3D-FA86-4812-9928-3F4ECF7AECB4.

environmental disasters, and climate change, pursuant to HCD's AFFH Guidance. AFFH Guidance, p. 42. By removing this analysis the Draft fails to adhere to its AFFH duty. We urge the City to reinsert this section and build on this analysis to ensure implementation of strong programs that address the needs of communities impacted the most by climate disaster.

We must reiterate[26] that using The Urban Displacement Project's criteria alone is not sufficient to accurately describe displacement risks impacting residents associated with housing cost pressures. Although data for 2019 has been included, this time period does not capture the sharp and sustained escalation in housing costs (both rental and ownership) that occurred during the COVID-19 pandemic between 2019 and 2022.[27] Between 2017 and 2021, Fresno experienced the greatest rent increases of all large U.S. cities, with rental prices increasing nearly 39% during that time.[28] The City failed to include this vital analysis and therefore the AFH's displacement risk analysis must be supplemented with and revised based on more recent data in order to adequately fulfill this requirement. §65583(c)(10)(A)(ii); AFFH Guidance, pp. 39.

As previously stated, the "Displacement Avoidance Efforts" do not remedy the need for a complete analysis addressing the displacement risk factors above, including relevant City policies and practices, and the adoption of meaningful actions to address those risks. And although it mentions the City's Displacement Avoidance Plan (DAP) and the Here to Stay Report[29], we must once again ask that the AFH incorporate and consider relevant information and policy recommendations contained in that report.

1. *Tenant Protection, Land Use, Environmental, and Climate-Related Displacement Risks Not Considered in the AFH Displacement Risk Analysis*

A complete analysis of displacement risks considers not only displacement risks associated with housing cost pressures, but also other factors which result in housing instability, including factors relating to the adequacy of tenant protections, disinvestment, local land use policies and practices, environmental hazards, and risks associated with natural disasters and climate change. The Draft Housing Element considers none of these risk categories, yet, based on our direct work with tenants and low-income residents and residents of color, they represent real and significant risk factors for Fresno residents.

[26] See attachment A, previous comment letters from LCJA.
[27] CalMatters, Real estate prices soar during the pandemic, climbing 25% in parts of California, Dec. 5, 2020, available at https://calmatters.org/california-divide/2020/12/real-estate-climb-pandemic/
[28] Los Angeles Times, The Nation's Hottest Housing Market? Surprise – it's Fresno, Mar. 31, 2021, available at https://www.latimes.com/homeless-housing/story/2021-03-31/fresno-rent-spike-taps-into-california-covid-housing-trends
[29] Brown, B., Heer, N., Love, N., Pollard, K., Thomas, D. (2021, June 9). Here To Stay: A Policy-Based Blueprint For Displacement Avoidance in Fresno. *Thrivance Group*. https://www.transformfresno.com/wp-content/uploads/2021/06/transform-fresno-here-to-stay-report-english.pdf

Once again, we ask that the City incorporate the following analysis and assessment to the Displacement risk section:

- Address the adequacy of policies and resources to protect tenants from displacement as a result of eviction, harassment, and substandard housing and include additional and stronger policies and programs to protect tenants, including in particular more comprehensive and stringent rent control standards than those established by the state, just cause requirements for eviction, and right to return home for displaced residents.
- Analyze the success and effectiveness of the City's code enforcement programs.
- Consider the extent to which public and private disinvestment and unequal investment continues to impact low-income neighborhoods, neighborhoods of color, and neighborhoods with a high proportion of tenants and how disinvestment perpetuates and/or increases displacement risk in these areas.
- Consider the City's land use and permitting decisions which have directed and continue to allow for and promote the concentration of industrial and waste management facilities in and around neighborhoods in Jane Addams, Southwest Fresno, South Central Fresno (referred to by the Draft Housing Element as the "South Industrial Area"), and Southeast Fresno.
- Consider displacement risks associated with environmental hazards, environmental disasters, and climate change, pursuant to HCD's AFFH Guidance. AFFH Guidance, p. 42.

The City must revise the AFH to include a complete and accurate Displacement Risk analysis as described above and modify other sections of the Housing Element, including the AFHs contributing factors and meaningful actions to overcome disparities relating to access to a healthy environment associated with these land use patterns.

V. The AFH Fails to Consider Significant Disparities in Access to Opportunity to Multi-Modal Transportation Options, a Healthy Environment, and Quality Education

As a reminder, the AFH must include an analysis of disparities in access to opportunity. § 65583(c)(10)(A)(ii). Access to opportunity broadly encompasses the place-based characteristics which are linked to critical life outcomes, including "education, employment, economic development, safe and decent housing, low rates of violent crime, transportation, recreation, food, and a healthy environment (air, water, safety from environmental hazards, social services, and cultural institutions). (AFFH Guidance, p. 34).

Although the previous Draft was amended to include some of the barriers to transit, unfortunately, the analysis continues to fail in comparing access to transportation opportunities based on protected characteristics; assess any disproportionate transportation needs for members of protected classes; provide important information about the adequacy of public transportation service in different areas of the City, protected classes, and low-income households; and entirely fails to consider access to other forms of transportation, including walking and bicycling.[30] The Draft states that, in order to "address these issues, the Housing Element includes a program to direct investments to address infrastructure and public service deficiencies in high-need areas including areas classified as high segregation and poverty, low resource, and moderate resource." But without a comprehensive analysis, the City cannot create programs that will address the needs of communities living in R/ECAP.

As discussed in our previous letter, a complete analysis of access to a healthy environment should consider any impacts on access to a healthy environment associated with the zoning, siting and operation of polluting or toxic land uses in disadvantaged communities and with climate change. Id. at pp. 16, 73. It must also be informed by public input, which is especially important in Fresno given the high concentration of communities in low-income South Fresno neighborhoods of color that rank among the most burdened by multiple sources of pollution in the state. Once again, the current Draft failed to incorporate this analysis. City policies and practices have intentionally concentrated polluting and noxious industrial and waste management land uses in South Fresno neighborhoods and policies and practices remain in place that all promote the exacerbation of these patterns to the detriment of housing opportunities and quality of life for South Fresno residents. The City must fulfill a robust analysis to inform better policies and programs such as impact fees for a community benefit fund, public health impact reports, and cargo/freight prohibition and revenue tax.

The current Draft failed to include any additional analysis for educational opportunities. Per our previous comment letter, we urge the City to consider how policies, practices, and investments or disinvestments relating to access to green space, tree canopy, and climate resiliency (including adequate cooling and wildfire smoke protection) impact educational opportunities at schools, especially in low-income neighborhoods. The City must revise its analysis of educational opportunities to address these and other issues not addressed in the Draft Element and revise and add to its actions accordingly.

VI. Failure to Adopt Community-Identified Programs That Will Result in A Beneficial Impact During the Planning Period and AFFH

Program 1–Maintain Adequate Sites. HCD's February 1, 2024, findings instructed the City to include program language to facilitate development of pipeline projects during the planning

[30] See our past comment letters, attachment A.

period, to monitor the progress of those projects, and to take alternative actions if the projects are not on track to be available before the end of the Sixth Cycle. The City has amended Program 1 to indicate that the City will "work with applicants of pipeline projects," to "monitor the progress made on these sites," and to reevaluate pipeline sites if their entitlements expire. However, this program needs more specific language about the concrete actions the City will take to facilitate the timely development of pipeline projects–especially affordable pipeline projects–and timelines for reevaluating sites when pipeline projects are abandoned or modified, as well as for when entitlements expire.

Additionally, prior comments stressed the importance of community outreach and transparency in site identification, including in future site identification to address changes in pipeline projections and/or no-net-loss issues. The City should add commitments to this program to ensure that it is seeking, receiving, and acting on community input regarding the identification of new sites. Local knowledge and input regarding proposed sites can help ensure that the City is identifying sites in a way that encourages affordable development, avoids environmental harms, and promotes racial and economic integration.

Program 2 – Variety of Housing Opportunities in High Resource Areas. The City must go beyond their revision to "encourage racially and socially inclusive neighborhoods" and provide a detailed explanation on how it will promote the development of affordable units to lower income households. Furthermore, the program still lacks a clear commitment to zone sites for multi-family development in areas of high resource, a commitment to ensure that units are affordable to all income levels, and a commitment to match funding opportunities with the identification of available sites to facilitate their development. Although the Timeframe was revised to increase the number of units for high density-multifamily development in high resource areas from 750 to 1250, specifically by adding 500 additional units by December 2031, the timeline should still be shorten to ensure the City is making a clear effort to promote housing mobility and Affirmatively Furthering Fair Housing.

Program 3 – Encourage and Facilitate Accessory Dwelling Units and Small Homes. The revisions made to program 3 should have outlined the City's intention to make the development of ADUs affordable to low-income families, specifically as a place-based revitalization strategy in order to AFFH. The City must also provide a definition for "small homes" that clearly explains how they differ from ADU's. Furthermore, the City should do more than "subsidize"ADU inspection fees and keep the original language to "waive" these fees. Lastly, the revisions made to the objective should not exclude the development of ADUs for extremely-low and lower-income families and maintain its original goal to facilitate the development of 50 ADUs for these households while also keeping the revised goal to make 50 small homes available for lower-income households.

Program 9–Use of Sites in Previous Housing Elements. Government Code section 65583.2(c) requires that non-vacant sites identified in at least one prior housing element and vacant sites identified in at least two prior housing elements must be rezoned "to allow residential use by right for housing developments in which at least 20 percent of the units are affordable to lower income households." Because the City failed to adopt a housing element that substantially complies with Housing Element Law by April 29, 2024 (120 days from the City's statutory deadline to adopt), it must complete that rezoning within one year of the City's statutory deadline to adopt. Gov. Code 65583.2(c). Accordingly, the timeframe for this Program must be amended to ensure that rezoning will be complete by December 31, 2024.

Program 11 – Incentives for Housing Development. Although the program to incentivize housing development was revised to include access to resources "for lower-income residents, and promote racially and socially inclusive neighborhoods," when working with multifamily and affordable housing project developers it still lacks a clear commitment towards actions taken to complete the program. Furthermore, the City should do more than "consider additional incentives" and provide additional incentives as well as list all available incentives on a publicly accessible database. Lastly, in order to promote housing mobility and AFFH, the city must do more than "Consider incorporating the location of affordable housing in High Resourced Areas" and ensure the placement of affordable housing in these areas.

Program 14 – Partnerships with Affordable Housing Developers. Program 14 should be further revised to state that the City will "identify site opportunities for affordable housing in higher-resourced areas and areas with higher median incomes to reduce concentrations of poverty and improve access to resources." Furthermore, when convening stakeholders to identify ongoing regulatory and funding barriers to affordable and mixed-income development, the City should include lower income households, special needs households and individuals in protected classes. (HCD AFFH Guidance pg. 20). The program should be amended to include strategies to combat NIMBYism, which has stalled and terminated several affordable housing projects in high resourced areas. The quarterly convenings should also be used to provide stakeholders with a report on the success of the program. Additionally, the time frame should be changed to bi-annual reporting throughout the planning period, bi-annual reporting review and assessment of potential funding opportunities, and quarterly convenings with stakeholders. In order to truly integrate communities this program must be amended. (HCD AFFH Guidance pg. 12).

Program 17–Surplus Public Lands. The City should review and revise Program 17 to ensure that it complies with the Surplus Land Act. HCD's just-released Updated Surplus Land Act Guidelines (Aug. 1, 2024) can be a helpful resource. For example, the current Draft replaced 15 percent with 10 percent in describing the minimum percentage of affordable units in developments built on surplus land, but the Act requires 15 percent affordable units in projects of 10 or more units. *See* HCD SLA Guidelines, p. 28. Additionally, the reference to evaluating

surplus sites for "other community-serving uses" prior to disposition under the SLA is ambiguous but could be read to indicate that the City plans to attempt to use surplus City-owned sites for commercial or other uses in violation of the SLA.

Additionally, because the City has identified so many City-owned sites in its site inventory, this program should include proactive steps, beyond the base requirements of the SLA, to facilitate affordable housing development on those sites, especially sites in higher-opportunity areas. The list of potential sites, disposition and disposal strategy, and rezoning of city-owned sites are good first steps. *See* Draft 1E-1-23. Since land acquisition is one of the biggest challenges for affordable developers, these sites represent a rare and valuable opportunity for the City to facilitate the development of much-needed affordable housing.

Program 19 – Home Buyer Assistance. This action commits the City to "strive to support a total of 40 low- and moderate-income households with home purchases during the planning period." These commitments lack specificity and do not ensure a beneficial outcome within the planning period. Without a complete and comprehensive AFH, it is impossible to create a meaningful and impactful Home Buyer Assistance program since they failed to analyze constraints, access to opportunity, past programs etc. We reiterate that this program must include additional commitments to ensure that low-income residents, undocumented residents, residents who speak languages other than English, and residents in racially and /ethnically-concentrated areas of poverty (R/ECAPs) have the opportunity to benefit from these funds. If the City had done their due diligence in engaging the community, they would have heard from residents that during the 5th Cycle planning period, residents without social security numbers or who faced language access barriers were unable to apply for the City's homebuyer assistance program.

The City must amend this program, possible solutions include: ensuring that low-income residents are knowledgeable about the programs, undocumented residents are able to successfully apply for this program, including closing costs as part of funding packages. In order to ensure that residents living in R/ECAPs are targeted, we recommend the City create annual reports listing how many applicants were assisted, outreach efforts made and whether they live in R/ECAPs. Due to the concerns outlined above, the program as currently implemented and drafted fails to adhere to HCD's AFFH Guidance that "actions must be specific with timelines, discrete steps and measurable outcomes to have a 'beneficial impact' during the planning period."

Program 20 – Housing Choice Voucher Incentive Program. The revisions made to Program 20, Housing Choice Voucher Incentive program, did not incorporate meaningful actions with specific timelines and measurable outcomes that would result in a "beneficial impact." The City should take steps to ensure that voucher holders face no discrimination or limitations. The City should do more than conduct HCV outreach to developments in high resourced areas and revise

this program to incorporate targeted community outreach and HCV advertisement in low-resourced to promote Housing Mobility throughout the City. Please refer to our previous letter, **Attachment A** for further recommendations regarding how to limit HCV discrimination.

Program 22 – Housing Rehabilitation. The current program fails to meet its AFFH duty. It does not address the needs of extremely low income residents and vulnerable populations such as undocumented residents. This program fails to address equity concerns, disparities, and neglects the needs of marginalized communities particularly in R/ECAP; and it fails to incorporate strong actions and concrete steps. The Draft states that it will aim to connect at least 80-120 lower-income households with rehabilitation resources during the planning period and complete a third of these in areas of concentrated poverty." This is not enough. Proper AFH analysis would have shown that the most impacted are extremely low income households and therefore these should be prioritized with at least half or more than half. Additionally, once again we ask that this include rehabilitation in response to the negative effects of climate change such as weatherization, cooling mechanisms, like heat pumps, air conditioning, insulation and other cooling assets to increase resilience to extreme heat as part of the rehabilitation program.

Program 23 – Comprehensive Code Enforcement. Unfortunately, this program as written continues to fail to address critical housing issues since the last housing element cycle. The program should be revised to include actions around legally holding landlords accountable for retaliation, unlawful evictions, and harassment towards tenants who file code enforcement complaints such as a commitment to adopt a tenant anti-harassment ordinance. As stated, we recommend that the City adequately analyze code enforcement's procedures and incorporate tenant feedback for a comprehensive code enforcement program.

Program 26 – Fair Housing Services. This program is vague. Although it states that the goal is to "mitigate impediments to fair housing opportunities throughout the city, with an emphasis on supporting the needs of populations and neighborhoods most impacted by fair housing issues," it fails to establish timelines and concrete steps on how the City will achieve this. A full AFH analysis would have helped identify the needs of R/ECAP as well as strong milestones, objectives and timelines. Housing discrimination has been a pervasive issue in the City of Fresno and only those who have been impacted can inform this program, for example additional legal representation, landlord education on fair housing law, enforcement mechanism against bad landlords etc.

Program 27 – Environmental Justice. The City is already required to work on their Environmental Justice Element. In order to transform R/ECAP into areas of opportunity (AFFH Guidance, p.15), this program should focus on placed-based strategies in R/ECAP areas such as Southwest, South Central and Southeast Fresno. Such actions must include land use changes to rezone industrial uses away from sensitive receptors, prohibit siting of polluting uses in

communities identified as R/ECAP and adding a moratorium on warehouses in these areas. As written, this current program and its actions fail to affirmatively further fair housing. (AFFH Guidance, p.54).

Program 28 – Equitable Community Investments. This program states that the City has "initiated multiple efforts to incentivize investment in established areas rather than in new growth areas," they will focus on areas in the General Plan Figure IM-1 which have been identified as areas of priority for incentives and that they closely align with census tracts designated as areas of greatest need (high segregation & poverty, low resource, and moderate resource)." Unfortunately, the map only highlights areas, there is no analysis beyond the map. We strongly recommend that the City amend this program to prioritize South Fresno neighborhoods explicitly. South Fresno is identified as a R/ECAP, residents have continuously called for and advocated for increased investment for decades to support healthy housing, infrastructure, amenities and services. The program must include actionable items and strong commitments in order to comply with its duty to affirmatively further fair housing.

Program 29 – Equitable Engagement. The goal of this program is to "expand outreach and public education strategies to increase engagement amongst historically underrepresented populations and residents with the greatest need." This action contains non-specific commitment and fails to identify measurable outcomes with respect to equitable engagement. This program is identified as one that will improve the quality of life and access to opportunities in R/ECAPs but fails to identify how exactly it will accomplish this.

Program 30 – Workforce Development. Although we appreciate changes to this program, we strongly encourage the City to include a program that targets the unhoused community. Residents have identified a systemic issue within the unhoused community when they receive keys to their new unit, where once they transition out of the shelter they are sent back out into communities, expected to get a job and maintain it without proper training on how to apply for a job, keep it and budget for their expenses. As written this program fails to integrate R/ECAP and R/ECAA.

Program 33 – Mobile Home Parks. Although we appreciate language that acknowledges the additional need of this specific group, it still falls short in fulfilling AFFH requirements. Once again, we request that the Draft address the need for heat resiliency such as weatherization and insulation especially to older mobile home parks by funding a mobile home park renovation fund for all mobile homes. This fund will help low income families with issues that they need to address due to inspection violations or other habitability concerns. The Draft must also include HCD's Manufactured Housing Opportunity & Revitalization Program (MORE) as an additional funding source. These funds can be used for the acquisition, conversion to resident organization ownership, rehabilitation, reconstruction and replacement of mobilehome parks, as well the

remediation of health and safety items of both parks and individual mobile homes.[31] Additionally, this program should include a commitment to penalize and fine mobile home park owners who are not providing adequate and safe conditions for their tenants. The 5th Cycle Housing Element included Program 10A, a similar program, that directed the City to "Conduct and publish an assessment of housing-related needs in mobile home parks through communications with residents and owners, identifying city, state, federal, and private resources available to address those needs." The City must include an action in this program that finalizes this report, releases it for public input and implements MHP resident needs. The City must amend this program to fulfill their responsibility to AFFH, support quality of life and access to opportunity improvements for all mobilehome parks in Fresno.

Program 34 – Eviction Protection Program. In 2021, the City created their Eviction Protection Program (EPP) in response to communities' advocacy for a comprehensive Right to Counsel Program. Despite heavy resident support, the City opted to establish a less comprehensive program which failed to address specific community needs. During this year's budget hearing, the City shared data going back to 2021 showing the total number of tenants the City has supported - a total of 2,199 since the inception of the program; and a majority of them live in District 3, which is primarily a R/ECAP area. The data shows that the program has done the following:

- 364 people by preventing unlawful detainers filed,
- 597 People had their move-out time extended
- 107 people had the money owed to a landlord reduced
- 18 families helped with the Cash for Keys program
- 267 tenants remain in the home
- 293 Settlement with the landlord
- 580 Unlawful Detainers were prevented on the tenant's record
- 25 families had unlawful detainers removed from the record
- 18 Families, stopped lock-outs
- 186 people's unlawful detainers were successfully dismissed

Currently the City has allocated $2 million to continue the program. Unfortunately, this is an inadequate response to vulnerable communities' needs. The Draft's revisions soften the commitment to this program by striking "implement" and replacing it with "seek funding" and notes that funding will end in 2025. We strongly recommend that the City improve the EPP by

[31] California Department of Housing and Community Development. (2024). Manufactured Housing Opportunity & Revitalization Program (MORE). https://www.hcd.ca.gov/grants-and-funding/programs-active/manufactured-housing-opportunity-and-revitalization-program

adopting and implementing a comprehensive Right to Counsel program,[32] create a permanent source of funding, and increase the annual funding for this program. The City can also include HUD's Eviction Protection Grant Program (EPGP) as an additional source of funding. This grant will fund nonprofit organizations and government entities to provide no cost legal assistance to low-income tenants at risk of or subject to eviction.[33] This City must improve this program in order to comply with AFFH law.

Program 36 – Homeless Assistance. Although we appreciate the Draft's amendment to establish a pilot program funded by Encampment Resolution Funding (ERF) to resolve the experience of unsheltered homelessness for people residing in encampments, we strongly urge the City to host additional workshops to engage directly with the unhoused community to include much needed programs such as:

- Providing mental health outreach by doing home visits, trainings on how to deal with family members who have severe mental illnesses, as well as offering educational tools such as pamphlets and other services
- Helping newly housed individuals who show symptoms of hoarding issues, continued care is essential for a recently housed individual in order for them to continue living in their unit and not face eviction
- Currently, the City provides stationary showers in locations where few unhoused individuals live. We recommend adding mobile bus showers, along with an outreach team to assist the unhoused community throughout the City
- Mental health services provided longer than 60 days. The City can collaborate with the County to create such a program
- Open detox centers that allow an individual to stay 24 hours a day, 7 days a week without a 10 day limit in order for them to seek assistance anytime of the day or night
- Create an advisory board or an oversight committee with diverse stakeholders that include a majority of individuals that work directly with the unhoused community for accountability and transparency regarding the decision making process for all homelessness funds
- Trainings for City staff that work primarily with the unhoused community that have mental health and substance abuse illnesses
- Create free sober living with job training and housing navigation for a year
- Use of emergency funds to support the outreach and care for unhoused children/youth with a response of 24 hours.

[32] The Fresno Right to Counsel Coalition. (2020) Right to Counsel Proposal. Retrieved from: .https://leadershipcounsel.org/wp-content/uploads/2021/01/Fresno-Right-to-Counsel-Coalition-Community-Proposal.pdf.
[33] Office of Policy Development and Research. (2024). Eviction Protection Grant Program. Retrieved from: https://www.huduser.gov/portal/eviction-protection-grant.html

- Development and implementation of shelter standards for all City-supported shelters to provide due process for shelter residents facing "exits" from shelters and to ensure that shelters are providing reasonable accommodations to individuals with disabilities.

Additionally, the Draft element lacks policies and programs that have been uplifted by community residents for decades, also identified in LCJA's August 2023 comment letter (see attachment A). We strongly urge the City to incorporate community-identified programs listed below into the Draft before submitting to HCD.

- **Reinstate the Emergency Rental Assistance Program and Incorporate a Rent Stabilization and Just Cause Protection Ordinance.** Once again we must reiterate that the data from Figure 1E-3.31: Percent of Renters Overpaying, Fresno, 2014-2019 fails to capture data from the housing crisis that ensued after the pandemic. According to the U.S. Census Bureau's 2021 American Community Survey data, 52% of all Fresno tenants renting are cost burdened and 92% of the 18,259 households that earn less than $20,000 annually are rent-burdened.[34] The need for an Emergency Rental Assistance was created to respond to the needs of all residents but particularly those living in R/ECAP communities. This program was removed entirely from the July Draft to the November Draft and remains excluded in this revised Draft, even after continuous advocacy from residents. More than 19% of all households are cost burdened and more than 20% of all households are severely cost burdened. Additionally, the increase in rents are only exacerbating the housing crisis. This program would help R/ECAP communities as a placed based strategy.

  Additionally, we recommend the inclusion of a Rent Stabilization and Just Cause Protection Ordinance, which will protect existing residents from displacement and preserve housing choice and affordability. (HCD AFFH Guidance pg. 74). We recommend the following:
    - The City will implement a Rent Stabilization and Just Cause ordinance by December 2025 to protect tenants from unreasonable rent increases and unjust evictions, and develop a rental registry.
      - The City will establish a community workgroup to develop a rent stabilization and just cause ordinance draft by Winter 2025.
      - The City will conduct at least one community workshop to inform the development of the ordinance by Spring 2025.
      - The City will release a draft ordinance for public review by Summer 2025.
      - The City will adopt the ordinance by December 2025.

[34] Montalvo, M. (2024). Fresno Family Spends Over 30% of Its Income on Housing. Would Rent Control Change That? *The Fresno Bee*. Retrieved from:https://www.fresnobee.com/news/local/article276839841.html.

- **Inclusionary Zoning Ordinance.** In order to replace segregated living patterns with truly integrated and balanced living patterns and comply with local fair housing laws, the City must add stronger programs to their Draft. (HCD AFFH Guidance pg. 30). We strongly recommend that the City create and implement an Inclusionary Zoning Ordinance. Per our analysis on governmental and non-governmental constraints and AFH, the City's inadequate assessment does not provide sufficient information to create strong programs. Based on decades of experience, residents understand and want the City to adopt an Inclusionary Zoning program that would help the City reach its VLI and LI household units for this planning period. NIMBYism is a top constraint to build housing in Fresno, for example the *Martinez v. City of Clovis* case highlighted this issue. Advocates were instrumental in winning this case where the court required sites to be rezoned to accommodate the RHNA for lower income housing or for the RHNA carried over from the prior planning period must be made available at minimum densities as well as being available for development by-right…the Court decided that the City's failure to zone for multi-family housing also violated the City's AFFH duty.[35]

- **Establish a safe maximum indoor air temperature for residential dwellings**. The Draft failed to complete an adequate AFH, site inventory analysis and a disaster-driven displacement risk analysis that assessed the impact of climate change on vulnerable communities particularly R/ECAP. As climate change exacerbates the intensity and longevity of heat waves, the City must take swift action to ensure the health and safety of all residents, but particularly at-risk populations such as children, senior citizens, people with disabilities, people with section 8, and people with autoimmune diseases. Therefore, we recommend the City include a program to establish a safe maximum indoor air temperature threshold for residential dwellings and a program to help facilitate the provision of cooling systems, such as heat pumps.

- **Urban Greening.** We strongly recommend the Draft include a program that addresses urban greening inorder to transform R/ECAP into areas of opportunity. Urban greening should be used to create buffer zones for residential dwellings that are surrounded by polluting land uses to mitigate health impacts.

- **Citing Industrial Uses**. In order for the City to fulfill their AFFH duty, they must incorporate place-based strategies to encourage community conservation and revitalization. (AFFH Guidance, pg. 73). We recommend that the City include a program that limits placing housing projects aways from heavy, light industrial uses or phasing out light/heavy industrial zones near R/ECAP. This will address the negative environmental, neighborhood, housing and health impacts associated with siting and operation of land

[35] Insert link to case.

uses such as industrial, agricultural, waste storage, freeways, energy production, etc. in disadvantaged communities. (AFFH Guidance, pg. 73).

- **Impact Fees.** We urge the City to include a program that places impact fees into a community benefit fund when polluting land uses and practices are placed near housing. The community benefit fund will create revenue and should be managed by the community directly impacted to dictate where funds will be allocated in order to transform R/ECAP and fulfill the City's AFFH duty.

- **Developing Public Health Impact Reports** for new industrial development in order to understand existing public health disparities and the potential of those conditions worsening as a result of industrial development, particularly in R/ECAP. Public health agencies should be resourced to support this analysis. The findings of these reports should be available publicly and be included in permit approval processes and other key decision-making milestones.

- **Establish a Cargo/Freight Prohibition and Revenue Tax** to directly fund community-based housing and projects in the neighborhoods most negatively impacted by years of environmental toxicity caused by freight.

- **Incorporate Complete Streets principles** into all transportation projects at all phases of development, including planning and land use decisions, scoping, design, implementation, maintenance, and performance monitoring.

- **Establish a Housing Element Implementation Committee** to oversee the timelines and implementation of each program and policy. The committee should be composed primarily by tenants, low-income homeowners, and at-risk populations to ensure implementation meets the needs of most at-risk communities.

Including the program recommendations listed above will ensure the City reaches state law compliance on their Housing Element and ensure programs and policies have clear timelines, metrics and Affirmatively Further Fair Housing. We reemphasize the need for the City to identify funding sources for all programs to ensure they will effectively be implemented in the upcoming years.

VII. Conclusion

The undersigned organizations welcome the opportunity to continue collaborating on the City of Fresno Housing Element Update to ensure the housing needs of all residents in the City are met in the upcoming years. Housing is an essential component of everyday life and tenants

who live in fear of losing their homes suffer tremendously, not just economically, but mentally and physically as well. California is currently facing a devastating housing crisis and the City of Fresno has a responsibility to ensure residents throughout the City live in safe, equitable and healthy housing.

Respectfully,

/s/
Jovana Morales Tilgren, Housing Policy Coordinator,
Leadership Counsel for Justice and Accountability

/s/
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We are Not Invisible

Julian Mosley, Chair
Fresno Homeless Union

City of Frenso Community Residents
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Ilda Villa, District 7
Guillermina Leon, District 3

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August 7th, 2024

Michelle Zumwalt
Planning and Development Department, City of Fresno,
2600 Fresno Street, Room 3065, Fresno, CA 93721

On behalf of the California Apartment Association (CAA), I reiterate CAA's support for the Fresno County Multi-Jurisdictional Housing Element Update as currently written and as a follow-on to our letter from August 2023. The Housing Element update's core goals and proposed policies reflect the importance and urgency of developing housing across Fresno County that is affordable and available to families of all income levels. CAA looks forward to working with all jurisdictions in successfully implementing this plan's goals.

CAA appreciates the work Fresno County, the incorporated cities of Fresno County, and the Council of Governments have done on this Housing Element update. CAA looks forward to working with all stakeholders in the passage and implementation of the Multi-Jurisdictional Housing Element in its current iteration.

Sincerely,

Greg Terzakis
Senior Vice President

April 12, 2024

Michelle Zumwalt, Architect
Planning and Development Department, City of Fresno
2600 Fresno Street, Room 3065
Fresno, CA 93721

Sent via Email

RE: State Noncompliance Findings for the City of Fresno's Revised Public Review Draft 2023–2031 Housing Element

Dear Ms. Zumwalt:

Leadership Counsel for Justice and Accountability (LCJA) works alongside the most impacted communities to advocate for sound policy and eradicate injustice to secure equal access to opportunity regardless of wealth, race, income, and place. We submitted letters in October 2022, August 2023, and December 2023 (attached in same email) to comment on the November 2023 Revised Draft Housing Element submitted to the California Department of Housing and Community Development (HCD) on November 3, 2023 (the Draft). We appreciate the City of Fresno taking the time to read and respond to our comments. There are, however, substantial revisions needed before the second draft is released, including addressing community concerns and

priorities and adhering to the requirements in HCD's Noncompliance Findings Letter from February 1, 2024.[1]

I. The City Must Engage the Community Throughout the Housing Element Draft Revision Process

The City must meaningfully engage all economic segments of the community in varied ways that consider the diverse and unique needs of community members. Gov't Code § 65583(c)(9). As stated in our previous letters, the Draft was not informed by adequate engagement. HCD's Noncompliance Findings require the City to adequately engage community residents in disadvantaged communities—specifically, the residents in Southwest, South Central, and Southeast Fresno, the mobile home park communities of Three Palm and Jane Addams, and the community-based organizations that represent them—as the City revises its Draft. HCD Appendix at 9. LCJA has not been made aware of any effort by the City to conduct community engagement or inform residents of its statutorily mandated Housing Element revisions to date.

We recommend the City engage the community in the following ways: (1) conduct workshops in impacted communities[2] at various times, including outside of the typical working hours of 5 AM – 6 PM; (2) provide multilingual materials and translation services (e.g., Spanish, Hmong, Punjabi); (3) provide helpful services to facilitate more inclusive engagement (e.g., child care services, meals, transportation); (4) supply a mix of in-person and virtual engagement opportunities; and (5) conduct varied, targeted, and multilingual outreach considering the unique needs of individual communities (e.g., mailers, local neighborhood newsletters, leaving materials in community spaces, bilingual radio ads). *See* AFFH Guidance at 11. Without this engagement, the City will not be able to adopt a compliant Final 6th Cycle Housing Element.

II. The City Must Complete an Analysis of Fair Housing and Constraints

A.B. 686 (Cal. 2018) addresses discriminatory land use and housing policies and practices by imposing an independent state mandate expanding the duty of all California's public agencies to

[1] Letter from the Department of Housing and Community Development to Michelle Zumwalt, Architect, Planning and Development Department of the City of Fresno (Feb. 1, 2024), https://fresnomjhe.com/wp-content/uploads/2024/02/fre-fresno-draft-out-020124.pdf [hereinafter HCD Letter]; Letter from the Department of Housing and Community Development to Michelle Zumwalt, Architect, Planning and Development Department of the City of Fresno app. (Feb. 1, 2024), https://fresnomjhe.com/wp-content/uploads/2024/02/fre-fresno-draft-out-020124.pdf [hereinafter HCD Appendix].

[2] *E.g.*, Southwest, South Central, and Southeast Fresno and the mobile home parks of Three Palms and Jane Addams..

AFFH and also ensures local jurisdictions comply with new housing element requirements. Gov't Code § 8899.50; *see* AFFH Guidance at 7. In order to ameliorate past actions that led to inequity, decisionmakers must create land-use and funding policies to increase affordable housing in high resource neighborhoods and bring additional resources to traditionally under-resourced neighborhoods. AFFH Guidance at 6. HCD has stipulated certain inadequacies with the City's AFFH duty and housing element requirements which require revision for the City to be found in compliance for its 6th Cycle Housing Element. *See* HCD Appendix at 1–3, 8.

The November Draft and the City's plans and discussions to date regarding the 6th Cycle Housing Element and its implementation do not AFFH and are *materially inconsistent* with this duty. Gov't Code § 8899.50; *see* AFFH Memo at 1; AFFH Guidance at 8–9. For example, please see the discussion regarding the exclusion of resident priorities in the City's creation of its programs *infra* Section I. In addition, the City has recently engaged in problematic rhetoric around the 2023 Annual Progress Report on its 5th Cycle Housing Element, its RHNA, and the 6th Cycle Housing Element drafting: The City has reiterated it is not prioritizing affordable housing production; it is *not willing to create the necessary conditions* to facilitate its development; and it is subjecting itself to the consequences[3] of a noncompliant housing element, including shorter rezoning deadlines, possible legal enforcement, and *forfeiture of millions of dollars* in development funding.[4] Through these actions, the City has violated its broad AFFH Duty. HCD's Findings, which the City has not prioritized or taken seriously,[5] compel the City to discuss how it complies with fair housing laws, including the City's broad duty to AFFH. HCD Appendix at 1; *see* Gov't Code § 8899.50. The City must critically examine its past and current policies and practices (including City staff's rhetoric, characterization, and actions regarding state housing and civil rights laws) and ensure its 6th Cycle Housing Element, in accordance with HCD's Findings, fulfills its duty to AFFH.

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[3] HCD Letter at 1–2.

[4] *See* Hearing to Receive Public Comment on the 2023 Housing Element and General Plan Annual Progress Reports, City Council Meeting, City of Fresno (Mar. 21, 2024), https://fresno.granicus.com/player/clip/1603?view_id=1&redirect=true [hereinafter 3/21 CC Meeting]. During this meeting, the City presented its 2023 Housing Element Annual Progress Report (APR). Sophia Pagoulatos, the Senior Manager of Long Range Planning (LRP) for the City's Planning and Development Department gave a presentation covering an overview of the APR, including discussing what the housing element is, the five main objectives of the City's housing element, the City's Regional Housing Needs Allocation (RHNA) data, housing applications processed, affordable housing in the pipeline, highlights about programs, and outreach. This presentation was followed by public comment and council members' response to the public comment.

[5] *See* 3/21 CC Meeting *supra* note 4. The City delayed in notifying City Council and the public that it was out of compliance with its 6th Cycle Housing Element, showing they are not serious with complying with state housing and civil rights laws.

A. The City must adopt programs that address disproportionate housing needs, result in a beneficial impact, and affirmatively further fair housing.

HCD finds that the City fails to evaluate the characteristics of Racially and Ethnically Concentrated Areas of Poverty(R/ECAP), their "changes over time, comparisons to other neighborhoods in terms of equitable quality of life and consider other relevant factors, such as public participation, past policies, practices, and investments and demographic trends." HCD continues to state that most of the Southern portion of the City is an area of High Segregation and Poverty that was not properly analyzed and therefore the City failed to include significant and beneficial actions, including place-based strategies toward community revitalization that are targeted towards these areas.

In order to Affirmatively Further Fair Housing(AFFH), the City must engage communities and incorporate policies and programs that address their needs, but specifically decrease the trajectory of continual concentrated areas of poverty. Outlined below is a list of community-based priorities we submitted on October 3, 2022 that the City should include in the second draft.

- Adopt a local rent stabilization ordinance, to protect tenants from continuously rising rents, including a rent stabilization board to hear and approve rental increases submitted by landlords
- Adoption of tenant protections to reduce displacement risks, including just cause eviction that address gaps in protections afforded under the 2019 Tenant Protection Act and a right to counsel guaranteeing access to affordable legal counsel for low-income tenants in housing matters
- Inclusionary Zoning Ordinance
- Industrial Zoning Moratorium for heavily burdened low income residential areas
- Future Industrial Zoning siting prohibited near underserved communities - placing housing sites away from heavy, light industrial uses or phasing out light/heavy industrial zones
- Establish a permanent emergency rental assistance program to assist residents at risk of homelessness due to rent increases and changed circumstances and ability to pay. Identification of a permanent local source of funding will ensure continuous funding and that the program can be used to prevent displacement. The City of Fresno can leverage the Local Housing Trust Fund dollars and the State is continuing to grant monies for rental assistance programs
- Establish a permanent first-time homeownership assistance program to help tenants become first-time homeowners. Closing costs and downpayment assistance for

low-income, first-time homebuyers can help close the housing gap. Residents with ITIN numbers should be eligible for this program

- Investments in improvements to mobile home parks to address the needs, including needs from the mobile park assessment study, including weatherization and climate resiliency needs, to improve indoor and outdoor air quality, and to expand access to green space
- Establish a safe maximum indoor air temperature for residential dwellings
- Extreme heat and weatherization programs to address climate change. This includes funding for weatherization upgrades to homes and rental units, specifically in census tracts that rank the highest on CalEnviroScreen for pollution and poor health outcomes and are most vulnerable to climate change
- Establish an acquisition and rehabilitation fund to purchase older, blighted, and/or abandoned homes/buildings. The County and the City of Fresno can establish a revolving fund to insure that rehabilitated homes are sold back to the community at a low cost
- Grants for residents who want to develop affordable accessory dwelling units on their land in both the City and County of Fresno. Some residents are willing to sell parcels of land to the County to develop affordable housing and increase housing supply
- Urban Greening is used as buffer zones when residential is placed or already placed near existing polluting land uses to mitigate health impacts
- Suitable Vacant Land should be prioritized for affordable housing in order to bring Very Low Income and Low Income RHNA allocations into compliance
- Impact fees should be placed into a community benefit fund when polluting land uses and practices are placed near housing. The community benefit fund will be managed by the community directly impacted to dictate to who these funds should be allocated.

HCD notes that the element must reevaluate the patterns and trends of Racially Concentrated Areas of Affluence (RCAA) in the City and, depending on the outcome of the analysis, implement or modify meaningful programs that take action to promote housing mobility in the city such as:

- Anti Discrimination and Harassment Renter Protections
- Development of more affordable housing rental units in High Opportunity Zones of Affluence

- Prioritize Suitable vacant land for development of affordable purchasable housing builders ie: Habitat for Humanity or Self Help Enterprises

Additionally, section C-2 in HCD's findings state that, "based on the outcomes of a complete analysis" the element must make specific efforts towards programs that include the housing needs of Farmworkers. Community members highlighted the benefit of a program that informs Farmworkers of their rights in a way that is accessible to them. A program such as this would involve:

- Employing a bilingual/multilingual outreach team that reasonably operates outside of the typical working hours of a Farmworker.
- Implementing Outreach Methods that meet Farmworkers where they are without fear of hostility or inquiry of legal status in spaces frequented by Farmworkers (i.e Fresno Cherry Auction, Resource Fairs that take place in heavily impacted communities.)

B. Governmental Constraints

The City must also identify constraints to the sites identified for potential housing as required by Gov. Code § 65583(a)(5), and abide by its duty to Affirmatively Further Fair Housing ("AFFH") by "not only [conducting] an analysis of site capacity to accommodate the RHNA, but identif[ying] sites [that] serve the purpose of replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity." HCD AFFH Guidance, p. 12, Gov. Code § 8890.50. subd. (b).

Depending on a complete analysis of potential Government constraints, the city may have the opportunity to revise or add programs and potentially " address and remove or mitigate any identified constraints". Section B4 of HCD's Findings list Land use controls, Local processing and permit procedures, and on/off site improvements, and Constraints on Housing for Persons with disabilities (Residential Care Facilities, land use controls, and Reasonable accommodations appeals). In our previous housing Element Community meeting, residents identified the following priorities that could be developed into programs that meaningfully address governmental constraints.

- Allowing higher-density units in high resourced areas
- Supporting multi-family developers who are in competition with single family developers for the same sites
- Reduced permitting timelines for multi-family developments

- The City should commit not only to removing the limit on the number of units that can be contained in an SRO but also add it as a permitted use in the following zones: RM-MH, RM-2, and downtown while removing conditional use permit requirements from RM-2, RM-3, NMX, CMX, and RMX.
- Changes to the Muni Code section 15-2729, which will remove constraints on the development of emergency shelters
- Programs to support at-risk housing

III. Conclusion

We urge the City to address the issues outlined in this letter and previous letters submitted by LCJA and HCD. We look forward to discussing them with you and continuing to work with the City to ensure that it adopts a Housing Element that fully complies with the law and addresses the serious housing needs and disparities that impact City of Fresno residents.

Sincerely,

Emmanuel Agraz-Torres
Housing Policy Advocate, City of Fresno
Leadership Counsel for Justice & Accountability



Jasmine Robinson
Legal Advocate/Legal Fellow Sponsored by Weil, Gotshal & Manges LLP
Leadership Counsel for Justice & Accountability

Val Feldman
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Edith Rico
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Central California Environmental Justice Network

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CC:

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December 12, 2023

Michelle Zumwalt, Architect
Planning and Development Department, City of Fresno
2600 Fresno Street, Room 3065
Fresno, CA 93721

Sent via Email

RE: City of Fresno's Revised Public Review Draft 2023–2031 Housing Element

Dear Ms. Zumwalt:

Leadership Counsel for Justice and Accountability (LCJA) writes this comment letter in collaboration with the Public Interest Law Project (PILP) and residents of South Fresno neighborhoods impacted by the severe lack of decent quality, affordable, and permanent housing options, gaping disparities in access to opportunity in Fresno, and continued refusal of the City of Fresno (the City) to meaningfully engage with residents, especially those in disadvantaged communities, and incorporate their priorities into city planning and policies. This comment letter addresses the November 2023 Revised Draft Appendix 1-E: City of Fresno in the Fresno Multi-Jurisdictional 2023–2031 Housing Element (November Draft).

LCJA works alongside the most impacted communities to advocate for sound policy and eradicate injustice to secure equal access to opportunity regardless of wealth, race, income, and place. Through community organizing, research, communications, legal representation, and policy advocacy, LCJA influences land use and transportation planning, shifts public investment priorities, guides environmental policy, and promotes the provision of basic infrastructure and services. PILP works statewide to support local legal programs that address issues involving housing, land use, public benefits and homelessness. PILP has been providing substantive training, litigation support, and technical assistance in these areas for over twenty-five years.

The following recommendations are based on our experience to push for transformative community-led and identified solutions to elevate and advance their priorities for safe, affordable housing options and fair housing choices. The Housing Element is an important piece of planning our communities and solving our housing crisis together. Further, the State of California has recently strengthened the laws governing the Housing Element. With laws such as A.B. 686 (Santiago, 2018) and A.B. 1397 (Low, 2017), we expect this Housing Element to be robust,

meaningful, and indicative of solving our housing crisis. As always, we are willing to partner and work alongside the City to ensure that these requirements are fulfilled and even exceeded in order to create the change we want to see in the San Joaquin Valley.

Our comments below highlight further steps and actions the City must take to meet state Housing Element Law, Affirmatively Furthering Fair Housing (AFFH) law, and state and federal civil rights law requirements. We have also attached previous comment letters that we have collaboratively written with other community-based organizations (CBOs) regarding the City's 6th Cycle Housing Element (2023–2031) identified as Attachments A,[1] B,[2] and C.[3] While the November Draft does include some revisions that address certain comments in our previous letters, many issues we and community members previously raised remain unaddressed. In short, the November Draft fails to meet Fresno's housing needs and relevant state statutory requirements in several different ways and the City must undertake the following:

- **Meaningful Public Participation**
    - Conduct meaningful and varied community engagement, targeted outreach and consideration of the unique communities and populations served, especially communities with protected characteristics, before the final adoption of the Housing Element. *See* Gov't Code § 65583(c)(9); AFFIRMATIVELY FURTHERING FAIR HOUSING: GUIDANCE FOR ALL PUB. ENTITIES & FOR HOUSING ELEMENTS, CAL. DEP'T OF HOUSING & CMTY. DEV'T 18 (2021) [hereinafter HCD AFFH Guidance].
    - Provide for meaningful ongoing public participation and incorporation of community priorities to facilitate implementation of housing-related policies throughout the 6th Cycle planning period. *See* Gov't Code § 65583(c)(9); HCD AFFH Guidance at 18.
- **Adequate Incorporation of Public Comments**
    - Summarize all comments received—this includes information gathered in stakeholder consultations, study sessions, community workshops, the community survey, any public comments and comment letters received during city council meetings and received via email. *See* HCD AFFH Guidance at 22.
    - Discuss the process the City used to prioritize the housing issues raised across all comments. *See id.*

[1] Comment Letter from Leadership Couns. for Just. & Accountability et al. to the Fresno Cnty. Bd. of Supervisors, the Cities of Fresno Cnty. City Councils, & Deputy Dir. Kristine Cai of the Fresno Council of Gov'ts (Oct. 3, 2022) (on file with author) [hereinafter Attachment A].

[2] Comment Letter from Leadership Couns. for Just. & Accountability et al. to Mayor Jerry Dyer, Fresno City Councilmembers, & Michelle Zumwalt (Aug. 16, 2023) (on file with author) [hereinafter Attachment B].

[3] Comment Letter from Pub. Int. L. Project & Leadership Couns. for Just. & Accountability to Mayor Jerry Dyer, Fresno City Councilmembers, & Michelle Zumwalt (Aug. 16, 2023) (on file with author) [hereinafter Attachment C].

- Explain how the prioritized housing issues were incorporated into the Housing Element and acknowledge the housing issues raised in public comments that were not incorporated into the Housing Element and why. *See id.*

- **Analyze and Prioritize Constraints and Contributing Factors to Fair Housing Issues**
  - Analyze and prioritize governmental constraints on developing affordable housing. *See* Gov't Code § 65583(c)(3); HCD AFFH Guidance at 52. Ultimately, an analysis should be thought of as a detailed and critical questioning of anything complex in order to understand its nature, determine its features, and assess its progress or fitness. *See* discussion on the definition of the word analysis *infra* note 9. Specific analyses include, but are not limited to:
    - Impacts of current and planned zoning regulations.
    - Risks to publicly assisted affordable housing and distribution.
    - Impacts of the lack of tenant protections on the maintenance of housing.
    - Impacts of the implementation and enforcement of the building code.
    - Delays or restrictions in development resulting from required onsite/offsite improvement standards.
  - Analyze, *see* discussion on the definition of analysis *infra* note 9, and prioritize nongovernmental constraints that delay developing affordable housing. *See* Gov't Code § 65583(c)(3). Specific analyses include, but are not limited to:
    - Impacts of NIMBYs.
    - Risks of climate change, extreme weather, pollution, water instability, infrastructure development and other environmental constraints.
    - Effects of market forces and availability of financing.
    - Significance of land and construction costs.
  - Analyze, identify, and prioritize all fair housing issues and contributing factors—considering community input, the Local Assessment of Fair Housing (AFH), and the sites inventory—especially considering the addition of data in the November Draft providing evidence of more housing issues but a failure to identify any new contributing factors. *See* HCD AFFH Guidance at 25.
  - Justify the implementation programs with meeting the needs addressing the contributing factors to fair housing issues—this means linking the contributing factors to policy and meaningful actions. Gov't Code § 65583(c)(10)(A)(iv); *see* HCD AFFH Guidance at 12.
  - Analyze how 5th Cycle Housing Element programs have continued segregation and not adequately facilitated integration, healthy communities, and access to opportunity. Gov't Code § 65583(c)(10)(A)(iii); *see* HCD AFFH Guidance at 46.
- **Adequate Sites and AFFH Compliance**
  - Analyze the viability of non-vacant sites and large sites. *See* Gov't Code §§ 65583(c)(1); 65583.2; HCD AFFH Guidance at 12.
  - Provide evidence of approval during the projection period credited against the Regional Housing Needs Assessment (RHNA). *See* Gov't Code § 65583(c)(1).

- Analyze environmental constraints on the overall availability of inventory sites. *See* Gov't Code § 65583(5).

- **Adequate Implementation Programs**
  - Add needed implementation programs that are reflective of community priorities—this includes priorities from a recent LCJA Community Meeting on December 5, 2023, previous comment letters, and public hearings and workshops. *See* Gov't Code, § 8890.50(a)(1), (b), (d); Gov't Code § 65583(c).
  - Revise implementation programs which are noncompliant with the Housing Element and AFFH laws regarding specific, concrete, enforceable actions with measurable outcomes, milestones, and timelines. *See* Gov't Code, § 8890.50(a)(1), (b), (d); Gov't Code § 65583(c).
  - Strengthen implementation programs to better constitute meaningful actions. *See* Gov't Code, § 8890.50(a)(1), (b), (d); Gov't Code § 65583(c).

I. The City Fails to Facilitate Meaningful Public Participation Infrastructure in Its Housing Element Practices to Promote Sustainable Community Involvement.

The preparation, adoption, and implementation of a housing element requires a diligent effort to include all economic segments of the community. Gov't Code § 65583(c)(9). The element must describe meaningful, frequent, and ongoing community participation, consultation, and coordination that is integrated with the broader stakeholder outreach and community participation process for the overall housing element. Gov't Code § 65583(c)(9)–(10); Gov't Code § 8899.50(a)–(c). The City must proactively reach out to individuals and organizations that represent lower income households, people in protected classes, and households with special needs to develop open and mutual communication. HCD AFFH Guidance at 18. The City's November Draft does not demonstrate compliance with the statutory public participation requirements. A short outline of these issues includes:

- A failure to demonstrate meaningful and varied community engagement and effective meetings.
- A lack of effective targeted outreach and consideration of the unique communities and populations served.
- A lack of regard for ongoing public participation and consideration of residents' housing issue priorities.

As the CBO October 2022 Comment Letter highlighted, the City's public participation efforts should proactively and broadly be conducted through various methods[4] to ensure access and

[4] The California Housing and Community Development Department (HCD) provides guidance on approaches to public participation, including the following:

> Be proactive in reaching out to the community. Visit neighborhoods and participate in local events. Establish an ongoing housing-element update and implementation committee . . . . Use direct mail,

participation (e.g., holding workshops in disadvantaged communities and conducting effective outreach for them; conducting targeted outreach to special needs populations/protected classes; advertising opportunities to participate in and provide feedback on the housing element update in non-English language print media, radio, and television, including media in Spanish, Hmong, and other languages spoken by Fresno residents). *See* Attachment A at 2–4. Successful public participation is important because a diverse cross section of the population can be engaged in defining the housing problem and in crafting solutions that work for everyone in the community.[5]

A. The Housing Element is Not Informed by Meaningful or Varied Engagement

The City lacks the ability to "maintain integrity" with the community by failing to "conduct effective meetings and establish rapport early" and by treating public participation requirements as an opportunity to "'rubber stamp' a predetermined objective or policy."[6] While the City did conduct a series of community workshops[7] after its release of the July Draft, there is no evidence that this public engagement was meaningful for the community or provided an avenue to translate any of their priorities into concrete actions. The City did collect a lot of information, noting that these workshops provided almost two hundred comments,[8] but there seems to be no analysis (defined by Merriam-Webster's Dictionary as "a detailed examination of anything complex in order to understand its nature or to determine its essential features : a thorough study"),[9] discussion, or even

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> radio ads, and local print or electronic media (such as neighborhood newsletters) to communicate opportunities to engage in the housing-element process. Always consider the composition of your target audience and use communication tools that are language-appropriate, culturally sensitive, and grade-level readability. Use creative methods to communicate the importance of all stages of the housing-element process. Use attractive direct-mail brochures and surveys to capture information. Consider mobile resources . . . . Consider having barbeques or set up information displays at community events to enhance interaction with the public. *Public Participation*, Cal. Dep't of Housing & Cmty. Dev.: Bldg. Blocks: A Comprehensive Housing-Element Guide, https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks/public-participation (last visited on Dec. 7, 2023).

[5] *Public Participation*, *supra* note 4; *see also* Affirmatively Furthering Fair Housing, 80 Fed. Reg. 42272, 42293–94 (July 16, 2015) [hereinafter HUD's AFFH Rule] (describing how all localities "shall ensure that all aspects of community participation are conducted in accordance with fair housing and civil rights laws" and that "community participation processes must consider the populations served, and where they are located, and they must choose public participation approaches that will reach the populations served").

[6] *Public Participation*, *supra* note 4.

[7] The City conducted six community workshops between July 20 and August 9, 2023. *See* November Draft at 1E-i, 1E-6-2, 1E-6-3.

[8] *Id.* at 1E-6-14.

[9] It is important to note that an analysis is not a mere summary or description. It involves questioning a topic in more detail. Ultimately, an analysis should be thought of as a detailed and critical questioning of anything complex in order to understand its nature, determine its features, and assess its progress or fitness. Merriam-Webster's Dictionary definition of analysis is: "a detailed examination of anything complex in order to understand its nature or to determine its essential features : a thorough study." *Analysis*, Merriam-Webster: Merriam-Webster.com Dictionary, https://www.merriam-

acknowledgment of the importance of this feedback, following up with residents, or any effort to show that the City took the comments seriously and incorporated them into the November Draft.[10] Community participation "means a solicitation of views and recommendations from members of the community and other interested parties, a consideration of the views and recommendations received, and a process for incorporating such views and recommendations into decisions and outcomes." HCD AFFH Guidance at 64. Not communicating with the community about what happened to their feedback, where you are in the process and what final decisions are made can easily break the trust you are working to build through a robust community engagement process.[11]

Additionally, the City provided limited direct engagement methods: community workshops and sending out a community survey.[12] The main source of direct engagement with residents was workshops and this does not constitute varied or creative methods to engage the community.[13] Community members need to be engaged through a variety of forms so that residents who have less capacity to attend traditional meetings or are not as civic-minded have a chance to make their voices heard.[14] We recommend focusing on building rapport and trust in the community, providing other forms of engagement outside of community meetings (e.g., guided tours of housing developments/sites, mobile sources, and attending community events), following up with residents after this engagement, and creating safe and accommodating spaces for community-focused public meetings.

The City should engage in more public engagement before its January 31, 2024 deadline for its adopted 6th Cycle Housing Element in order to be compliant with the statutory mandates under Government Code section 8890.50(a)(1), (b) and (d) and Government Code section 65583(c)(9). This engagement must be varied and meaningful. We recommend focusing on building rapport and trust in the community, providing other forms of engagement outside of community meetings (e.g.,

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webster.com/dictionary/analysis (last visited Dec. 10, 2023). For further clarification, the word examine is defined as: "to inspect closely . . . to test by questioning in order to determine progress, fitness, or knowledge." *Examine*, Merriam-Webster: Merriam-Webster.com Dictionary, https://www.merriam-webster.com/dictionary/examine (last visited Dec. 10, 2023). And finally, the word inspect is defined as: "to view closely in critical appraisal : look over." *Inspect*, Merriam-Webster: Merriam-Webster.com Dictionary, https://www.merriam-webster.com/dictionary/inspect (last visited Dec. 10, 2023).

[10] *See Public Participation*, *supra* note 4 (describing how localities should "[f]ollow up after each event. After holding a public forum or activity, establish a procedure to follow up with concrete action to address the community's concerns. Be sure that all information relevant to the process is made available, either at regular meetings or by posting to a website. This will help to establish and maintain the jurisdiction's credibility").

[11] *Id.* provides helpful links to additional public participation resources; for one helpful resource, see *Pillar 3: Engage*, Inst. for Loc. Gov't: Housing & Pub. Engagement Toolkit, https://housingtoolkit.ca-ilg.org/post/pillar-3-engage (last visited December 7, 2023).

[12] November Draft at 1E-6-1.

[13] *See Public Participation*, *supra* note 4 (giving examples of creative engagement methods such as: mobile resources, barbeques, information displays at community events, guided tours of market-rate and affordable developments and sites being considered for housing development, training and education workshops, and computer simulations).

[14] *Pillar 3: Engage*, *supra* note 10.

guided tours of housing developments/sites, mobile sources, and attending community events), following up with residents after this engagement, and creating safe and accommodating spaces for community-focused public meetings. We also recommend maximizing the efficiency of meetings by having the Housing Division promote involvement of all appropriate local departments to ensure interdepartmental issues are addressed in a comprehensive and efficient manner.[15]

B. The City Failed to Facilitate Targeted and Inclusive Outreach and Meetings.

Government Code section 65583(c)(9) requires that the local government shall make "a diligent effort . . . to achieve public participation of all economic segments of the community in the development of the housing element, and the program shall describe this effort." In addition, the Federal Department of Housing and Urban Development's (HUD) AFFH 2015 Final Rule—which was "essentially preserve[d]" by the passage of California's A.B. 686, HCD AFFH Guidance at 13—states the importance of localities outreach efforts, saying they should "tailor outreach efforts to ensure effectiveness given the populations in their areas . . . . that will provide for meaningful actions . . . . [Localities] should employ communications methods that are designed to reach the broadest audience, and that are conducted in accordance with fair housing and civil rights laws, including Title VI of the Civil Rights Act of 1964." HCD AFFH Guidance at 16; 80 Fed. Reg. at 42295.

The City has failed to demonstrate adequate outreach and meetings inclusive of all sectors of the population. For the July/August community meetings, the City states its only outreach conducted was that city staff sent out four citywide email blasts and four social media posts. November Draft at 1E-6-13. The City provides no information on the adequacy of the outreach to all sectors of the community, providing no explanation regarding the demographics of their followers and subscribers or explanation what languages the information was presented in. This is problematic considering the demographic statistics: 28.3 percent of people, approximately 245,209 individuals, in Fresno County have limited-English speaking proficiency[16] and 15.9 percent of households, approximately 28,000 households, lack access to internet in the City of Fresno,[17] with these realities disproportionately affecting low-income neighborhoods and communities of color.

Furthermore, the City appears to not have offered translation services at the July/August meetings and did not indicate having provided materials at the meetings in multiple languages. November Draft at 1E-6-13 to 1E-6-16. These same issues—lack of adequate outreach, translation services at

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[15] *Public Participation*, *supra* note 4 ("For example, the public works department may be able to provide information about infrastructure issues, and the codes department may have information about the condition of the housing stock.").
[16] Fresno Cnty. Rural Transit Agency, Fresno Cnty. Rural Transit Agency's Title VI Program: Update 2023–2026, at 29 (2023), https://www.ruraltransit.org/wp-content/uploads/2023/07/FCRTA-Title-VI-2023-Final.pdf.
[17] Annalisa Perea, *Fresno Councilmember Seeks to Close the Digital Divide With More Internet Access | Opinion*, Fresno Bee (July 25, 2023, 11:02 AM), https://www.fresnobee.com/article277638528.html#storylink=cpy.

meetings, and multilingual presentation materials—seemed absent at the City's Events #2-10: Community and Stakeholder Meetings (October/November 2022) and Events #11-15: Community Workshops (February/March 2023) as well: The City provided no information or discussion on the availability of these facets in relation to these meetings. *See* November Draft at 1E-6-8 to 1E-6-13. This all stands in stark contrast to the detailed information regarding outreach and language accessibility related to Event #1: Community Workshop (August 31, 2022),[18] in which outreach was described as varied, targeted, and multilingual, the meeting provided translation services and multilingual materials, and the meeting had refreshments and activities for kids. *See* November Draft at 1E-6-3. Thus, the Housing Element indicates that the City engaged in targeted, varied, multilingual outreach for Event #1 and nothing else for the remaining fourteen events. Such meaningful outreach efforts must be continuous throughout the Housing Element process: One meeting reflective of appropriate community engagement standards at the outset of the Housing Element's development is inadequate and constitutes noncompliance with state law.

The City should engage in more public engagement before its January 31, 2024 deadline for its adopted 6th Cycle Housing Element in order to be compliant with the statutory mandates under Government Code section 8890.50(a)(1), (b) and (d) and Government Code section 65583(c)(9). The engagement must reflect that the City was diligent in its efforts to conduct outreach.[19] We recommend utilizing more methods that will reach disadvantaged communities such as direct mail, radio ads, and local print or electronic media (such as neighborhood newsletters) to communicate opportunities to engage in the housing-element process.[20] Another strategy is to specifically target disadvantaged and special needs groups,[21] many of which are identified in our previous comments. *See* Attachment A at 2–3. The City must always consider the composition of its target audience and

[18] The City notified the community of this meeting with flyers distributed in English, Spanish, Hmong and Punjabi through the Fresno Council of Governments (FCOG) listserv of regional stakeholders and community-based organizations (CBOs), and through the Fresno Housing Authority. November Draft at 1E-6-3. Linguistica interpreters were available for Spanish, Hmong, and Punjabi monolingual speakers. *Id.* Materials in Spanish, Hmong and Punjabi were available in-person at the workshop and online at the project website, accessible via QR code. *Id.* An Eventbrite registration page and Facebook event was created advertising that Spanish, Hmong, and Punjabi language interpretation would be provided, along with refreshments, and activities for kids. *Id.* Flyers were sent out through the Fresno Housing Authority to affordable housing residents. *Id.* City staff distributed the event to the email lists that they maintain for General Plan updates and the Anti-Displacement Task Force. *Id.* Fresno City Community Affairs Representatives distributed the event to Hmong and Punjabi speaking communities. *Id.*

[19] *See* HCD AFFH Guidance at 22 ("Outreach activities intended to reach a broad audience, such as utilizing a variety of methods, broad and proactive marketing, including targeted areas and needs, promoting language access and accessibility for persons with disabilities (which can include effective communication, reasonable accommodations, and remote participation opportunities), and consulting with relevant organizations.").

[20] *Public Participation*, *supra* note 4.

[21] *Id.* (listing the following as special needs and disadvantaged groups: "tenants in units at risk of conversion to market-rate, health- and human-service providers, homeless-shelter and mental-health service providers, places of worship, seniors, farmworkers, and non- and for-profit affordable housing developers").

use communication tools that are language-appropriate, culturally sensitive, and grade-level readability.[22]

The City must also revise the outreach section of its November Draft to "clearly describe efforts to engage the community throughout the housing element process (e.g., types of outreach, meetings)" related to its outreach methods and adequacy of translation and multilingual services for Community Meetings #2–15.[23] The November Draft must describe who was invited to participate, how they were invited to participate, which groups actually participated, and how the engagement provided an inclusive and accommodating environment for all sectors of the community to participate.[24] Finally, the City should anticipate all logistical concerns and address them, including: language barriers, transportation, meeting times, and child care.[25]

Additionally, the City must revise the November Draft to include an explanation of why there was a lack of participation, particularly from disadvantaged groups, in its public participation process. The HCD AFFH Guidance states: "The element must describe . . . [a] [s]ummary of issues that contributed to lack of participation in the housing element process by all economic segments, particularly people with protected characteristics, if that proves to be the case." HCD AFFH Guidance at 22. We recommend the City acknowledge its lack of inclusive, varied, and targeted outreach and engagement for its Community Meetings #2–15 to be in compliance with the guidance. Because the Housing Element "was developed without the required community participation or the required consultation," HCD must find the City of Fresno's Housing Element is "substantially incomplete." *See* 80 Fed. Reg. at 42358.

II. The City Fails to Summarize Public Comments Received and How Those Comments Were Considered and Incorporated Into the Housing Element.

The Housing Element must "describe and incorporate meaningful engagement that represents all segments of the community into the development of the housing element, including goals and actions." HCD AFFH Guidance at 21, 62. The City's obligations to diligently engage all economic segments of the community and to AFFH through the housing element require more than just seeking input about the contents of the housing element. Gov't Code § 65583(c)(9); Gov't Code § 8899.50(a)(1), (b), (d). As discussed in our previous comment letters, inviting residents to provide input but failing to incorporate that input into the housing element undermines the purpose of resident participation in the housing element update, fosters distrust, and fails to constitute "engagement" as required by Government Code section 65583(c)(9) of the Housing Element Law. Attachment A at 4, 6; Attachment B at 1; Attachment C at 2–3, 13. In short, the City must:

[22] *Id.*
[23] *Public Participation*, *supra* note 4.
[24] *Id.*
[25] *Id.*

- Summarize all comments received—this includes information gathered in stakeholder consultations and focus groups, study sessions with planning commissions, city councils, and the County Board of Supervisors, community workshops, the community survey, any public comments received during city council meetings related to the Housing Element, and all comments and comment letters received via email.
- Discuss the process the City used to prioritize the housing issues raised across all comments.
- Explain how the prioritized housing issues were incorporated into the Housing Element.
- Acknowledge the housing issues raised in public comments that were not incorporated into the Housing Element and why.

The HCD AFFH Guidance explains how housing elements must describe "a summary of [public] comments and how the comments are considered and incorporated (including comments that were not incorporated), particularly with changes to the housing element." HCD AFFH Guidance at 22; *see* 80 Fed. Reg. at 42315, 42356, 42361–62, 42364. The November Draft fails to comply with the statutory and regulatory requirements regarding the summary of comments and reasons they were or were not incorporated. As happened with the July Draft, the November Draft provides some description of public input provided, its summary of public comments generally lacks sufficient detail for the reader to understand the nature of the issue raised or the solution proposed. *See* Attachment C at 2–3. The City fails to explain how it prioritized the housing issues raised in comments during the workshops, public comments received via email, and comment letters submitted by CBOs, including LCJA and PILP's multiple comment letters. In addition, the November Draft, like the July Draft, fails to demonstrate the City's incorporation of input provided and to identify input the City chose not to incorporate as required. *See* Attachment C at 2–3.

Thus, the City's summary of comments—including comments from workshops, the survey, focus groups, comment letters, and comments received via email—explanation for prioritization of housing issues, explanation of how the comments were incorporated into the November Draft,[26] and "summary of any comments, views, or recommendations not accepted by the [City] and the reasons for nonacceptance" is grossly inadequate and must be revised. HCD AFFH Guidance at 22; *see* 80 Fed. Reg. at 42356. We recommend the City adhere to the statutory and regulatory requirements regarding the full summary of all comments received and explanation of incorporation (and lack of incorporation) of those comments.

[26] The City is expected to "[d]escribe the dates that the housing element and subsequent revisions were made available for public comment and how those comments were incorporated." *Public Participation*, *supra* note 4.

III. The City Fails to Analyze and Prioritize Constraints and Contributing Factors—Including Ways the City's 5th Cycle Housing Element's Implementation Programs Fell Short—That Limit or Deny Fair Housing Choice/Access to Opportunity and Negatively Impact Civil Rights.

A. The City Fails to Analyze Governmental and Nongovernmental Constraints

Housing Element law requires an analysis of potential and actual governmental and nongovernmental constraints upon the maintenance, improvement, or development of housing for all income levels including land-use controls, building codes and their enforcement, site improvements, fees and other exactions required of developers, and local processing and permit procedures." Gov't Code § 65583(a)(5)–(6); *see* HCD AFFH Guidance at 55; 80 Fed. Reg. at 42275, 42279. While the City did address our previous comment letter's concerns regarding the parking requirements constraint analysis, Attachment C at 6–7, the November Draft fails to address the remaining constraints analysis issues from our comment letter and remains substantially out of compliance with the statutory and regulatory requirements regarding constraints analysis, justification, and creation of a program to remove those constraints. Gov't Code § 65583(a), (a)(5)–(6), (c)(3); HCD AFFH Guidance at 52; *see also* discussion on the requirement for a program to remove constraints *infra* Section V.

The November Draft only made nine changes to the entirety of the constraints analysis. While the constraints section does adequately list laws, ordinances, and conditions, it lacks sufficient analysis (*see* discussion on the definition of the word analysis *supra* note 9) how these components could delay, prevent, or negatively affect the maintenance, improvement, or development of housing for all income levels. Any analysis given concludes that the constraints are limited or nonexistent. Listing constraints without analysis, however, will not result in meaningful action. The following references our previous comments that went unaddressed by the City in the November Draft:

- The Housing Element under analyzes the impacts of current and planned zoning regulations[27] on housing development. Attachment C at 4–5; *see* Martinez v. City of Clovis, 90 Cal.App.5th 193, 271 (2023); HCD AFFH Guidance at 55; 80 Fed. Reg. at 42310.

[27] It should be noted that courts have found civil rights violations regarding zoning ordinances with discriminatory effects. Martinez v. City of Clovis, 90 Cal.App.5th 193, 271 (2023) (holding a City defendant's zoning ordinance violated the FEHA and the FHA by having a discriminatory effect—which includes a disparate impact and a segregative effect on protected classes—when housing opportunities were made unavailable for protected classes); *see* 80 Fed. Reg. at 42310 ("Zoning and land use laws that are barriers to fair housing choice and access to opportunity can be quite varied and often depend on the factual circumstances in specific cases, including zoning and land use laws that were intended to limit affordable housing in certain areas in order to restrict access by low-income minorities or persons with disabilities.").

- The constraint analysis must examine what constraints exist to the development of: supportive housing, transitional housing, single-room occupancy units, and emergency shelters. Attachment C at 5–6; *see* Gov't Code § 65583(c)(1).
- The Draft's analysis of at-risk housing is incomplete and under-analyzes the risks to publicly assisted affordable housing and its distribution. Attachment C at 7.
- The City's lack of tenant protections should be analyzed as a constraint on the maintenance of housing under Government Code section 65583(a)(5). Attachment C at 7.
- The City lacks analysis on nongovernmental constraints:
    - The Draft must include an analysis of Not-In-My-Backyard (NIMBY)[28] and other local opposition to affordable housing and housing development. Attachment C at 8; *see* HCD AFFH Guidance at 55.
    - The Draft did not consider environmental constraints as part of its analysis under Government Code section 65583(a)(6). Environmental constraints may include limitations to water supply, nearby pollution, or infrastructure development. Attachment C at 8–9.
    - The Draft failed to include an explanation of the effects of market forces and availability of financing.[29] Attachment C at 9.

Upon further review, we find additional places in the constraints analysis that are missing the requisite and required components as put forth by HCD:

- Describe how the building code is implemented and whether the process optimizes predictability for developers.[30]
- Identify and analyze any local amendments to the state housing law or building code.[31]
- Discuss the type and degree of building code enforcement.[32]
- Describe any efforts to link code enforcement activities to housing rehabilitation programs.[33]

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[28] Just this month, in December 2023, "[e]ven at the threatened loss of future state money, the Fresno City Council . . . sided with neighbors who said a hotel conversion near Fresno and Bullard avenues is the wrong place for affordable housing. Edward Smith, *Fresno Council Votes Down Affordable Housing Project in North Fresno*, GV Wire (Dec. 8, 2023), https://gvwire.com/2023/12/08/fresno-council-votes-down-affordable-housing-project-in-north-fresno/. "Opposing councilmembers cited cost concerns and the view that affordable housing would bring blight to the area . . . . Advocates for the project, however, accused the detractors of NIMBYism (not-in-my-backyard)." *Id.*

[29] *See* HCD AFFH Guidance at 53; 80 Fed. Reg. at 42346 ("A basic tenet of planning and performance management is recognition of 'external factors' and other barriers to achieving goals, and which are beyond an organization to control . . . . Included in such considerations is the identification of funding dependencies and contingencies.").

[30] *Codes and Enforcement of Onsite/Offsite Improvement Standards*, Cal. Dep't of Housing & Cmty. Dev.: Bldg. Blocks: A Comprehensive Housing-Element Guide, https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks/codes-and-enforcement-and-onsite-offsite-improvement-standards (last visited Dec. 10, 2023) [hereinafter *Improvement Standards*].

[31] *Id.*

[32] *Id.*

[33] *Id.*

- Identify and analyze improvements to street widths, curbs, gutters, sidewalks, water and sewer connections, landscaping, circulation improvement, and any other onsite/offsite improvement required by the jurisdiction that could potentially be a constraint to development of housing. In addition, the housing element must describe any generally applicable level of service standards or mitigation thresholds.[34]
- Discuss the following nongovernmental constraints:[35]
    - Land costs — Estimate the average cost or the range of costs per acre for single-family and multifamily-zoned developable parcels.
    - Construction costs — Generally estimate typical total construction costs, including materials and labor.
    - Availability of financing — Consider whether housing financing, including private financing and government assistance programs, is generally available in the community. This analysis could indicate whether mortgage deficient areas or underserved groups exist in the community. The financing analysis may also identify the availability of financing from private foundations (including bank foundations) corporate sponsors, community foundations, community banks, insurance companies, pension funds, and/or local housing trust funds.

Thus, the City is still under-analyzing or omitting required governmental and nongovernmental constraints analyses under Government Code section 65583(a)(5)–(6). Therefore, we recommend the City revise all subsections of its governmental constraints analysis in the November Draft as well as add the entirely missing nongovernmental constraints subsections of analysis.

B. The Housing Element Lacks Adequate Analysis, Prioritization, and Justification of Its Identified Contributing Factors and Evidence of Correlation to the Implementation Programs.

A.B. 686 both creates a broad duty to AFFH in policies and practices, Gov't Code § 8899.50(a)(1), (b), as well as advances a Housing Element framework of AFFH which requires linking fair housing issues analysis with policy and action formulation. Gov't Code § 65583(c)(10)(a)(iii). As we mentioned in our previous comment letter, the City is required to identify and prioritize contributing factors to fair housing issues based on all the previously required analysis (outreach, fair housing assessment, site inventory). Attachment A at 6; Gov't Code § 65583(c)(10)(a)(iii); *see* HCD AFFH Guidance at 12; 80 Fed. Reg. at 42279–80. This identification and prioritization must give highest priority to factors that limit or deny fair housing choice or access to opportunity or negatively impact fair housing or civil rights. HCD AFFH Guidance at 12. The November Draft is not in compliance with Government Code sections 8899.50(a)(1), (b) and 65583(c)(10)(a)(iii)

[34] *Improvement Standards, supra* note 30.

[35] *Non-Governmental Constraints*, CAL. DEP'T OF HOUSING & CMTY. DEV.: BLDG. BLOCKS: A COMPREHENSIVE HOUSING-ELEMENT GUIDE, https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks/non-governmental-constraints (last visited Dec. 10, 2023).

related to AFFH as its contributing factors are under-analyzed, not prioritized according to community priorities and local knowledge,[36] and not described in any way to show justification for linking the contributing factors to the implementation programs.[37]

HCD has made clear the requirements regarding identification, prioritization, and justification of contributing factors as they relate to implementation programs:

> Contributing factors should be based on all the prior efforts and analyses: outreach, assessment of fair housing, and site inventory. Contributing factors must also be prioritized in terms of needed impact on fair housing choice and strongly connect to goals and actions. The identification and evaluation of contributing factors must: Identify fair housing issues and significant contributing factors; [p]rioritize contributing factors, including any local information and knowledge, giving highest priority to those factors that most limit or deny fair housing choice or access to opportunity or negatively impact fair housing or civil rights compliance; and [d]iscuss strategic approaches to inform and strongly connect to goals and actions. HCD AFFH Guidance at 49.

While the City's November Draft has myriad revisions regarding data, statistics, maps, tables, and diagrams within its AFH,[38] it has failed to comply with its required statutory and regulatory requirements involving contributing factors. The following shows the components of the AFH and

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[36] The Housing Element is informed by communities and residents of these communities will have the opportunity to weigh in on whether jurisdictions have accurately identified contributing factors and have established programs appropriate for identified contributing factors and related fair housing issues. *See* HCD AFFH Guidance at 49; 80 Fed. Reg. at 42288.

[37] The Housing Element must create programs for overcoming the effect of contributing factors as prioritized. *See* HCD AFFH Guidance at 49; 80 Fed. Reg. at 42288. For each program, the City must identify one or more contributing factors that the program is designed to address, describe how the program relates to overcoming the identified contributing factor(s) and related fair housing issue(s), and identify metrics and milestones for determining what fair housing results will be achieved. *See* HCD AFFH Guidance at 49; 80 Fed. Reg. at 42288.

[38] We acknowledge, specifically, that the City responded to our previous comment letters and added the following to its November Draft: (1) a short description related to development trends across income levels in its contributing factors to segregation section, November Draft at 1E-3-30; *see* Attachment C at 9; (2) data related to integration and segregation patterns for racial groups other than Hispanic/Latinos, November Draft at 1E-3-9 to 1E-3-13; *see* Attachment C at 13; (3) description regarding the distribution of low- and high-income households across Fresno, November Draft at 1E-3-14 to 1E-3-18; *see* Attachment C at 13; (4) information about the separate occurrence of overcrowding and cost burden based on race or ethnicity and information about how these factors disproportionately impact Fresno residents based on familial status, November Draft at 1E-3-62, 1E-3-63; *see* Attachment C at 14–15; (5) information relating to familial status of unhoused residents, November Draft at 1E-3-70; *see* Attachment C at 15; (6) consideration of the extent to which public and private disinvestment and unequal investment continue to impact low-income neighborhoods, neighborhoods of color, and neighborhoods with a high proportion of tenants and how disinvestment perpetuates or increases displacement risk in these areas, November Draft at 1E-3-85, 1E-3-86; *see* Attachment C at 18–19.

its determination and analysis of contributing factors—some identified in our previous comment letters and incorporated by reference herein—that need to be revised in the November Draft:

- **Integration and Segregation**
  - The AFH's analysis of R/ECAPs and RCAAs fails to address "public participation, past policies, practices, [and] investments" as required. HCD AFFH Guidance at 31; *see* Attachment C at 14.
- **Disproportionate Housing Needs**
  - The AFH does not include any analysis, or even acknowledgement of, housing needs of undocumented immigrants. *See* Attachment C at 3.
  - The November Draft, while noting a difference between communities of color and predominantly white communities as it relates to overcrowding and cost burden, fails to identify the separate occurrence based on individual race or ethnicity. *See* Attachment C at 14–15.
  - The November Draft includes no information about the occurrence of substandard housing conditions based on race or ethnicity. *See* Attachment C at 14–15.
  - The November Draft fails to provide sufficient information about how overcrowding, overpayment, and substandard housing conditions disproportionately impact Fresno residents based on familial status[39] and disability. *See* Attachment C at 14–15.
  - The analysis does not adequately reflect local knowledge or public input. *See* Attachment A at 6.
- **Displacement Risk**
  - The AFH's displacement risk analysis must be supplemented with and revised based on more recent data—the data used is from 2012–2017; the City should use data at least from 2019 and later, with preference for more recent data. *See* Attachment C at 16.
  - Must identify and evaluate the expiration of affordability covenants attached to Low-Income Housing Tax Credit financed properties during the Planning Period. *See* Attachment C at 16.
  - Must identify and evaluate the major federal, state, and local investments in public works infrastructure projects in South Fresno neighborhoods. *See* Attachment C at 17.
  - Consider the impact of speculation associated with High Speed Rail on housing availability, prices, and displacement risk. *See* Attachment C at 17.
  - Analyze the conversion of housing units to short-term rentals and their impact on housing cost pressures and displacement risk. *See* Attachment C at 17.

[39] There was one sentence added regarding familial status as it relates to overcrowding: "In addition, there is a greater presence of single-parent households and low levels of labor market engagement." November Draft at 1E-3-62.

- Given the significant stakeholder engagement conducted for the development of the *Here to Stay Report*[40] the AFH should incorporate and consider relevant information and policy recommendations contained in that report. *See* Attachment C at 18.
- Address the adequacy of policies and resources to protect tenants from displacement as a result of eviction, harassment, and substandard housing. *See* Attachment A at 7; Attachment C at 17.

- **Disparities in Access to Opportunity**
  - Analyze inadequate or absent infrastructure to facilitate safe and efficient active transportation.[41] *See* Attachment A at 5, 9–10; Attachment C at 8, 17, 24, 26, 28.
  - Analyze inadequate or absent protection from extreme weather, including climate-related weather events that impact walking, biking, and public transportation use. *See* Attachment A at 8; Attachment C at 24, 26, 35.
  - Analyze the presence of high volumes of traffic, including heavy-duty truck traffic, on roadways used by pedestrians or bicyclists, including in and near areas zoned for industrial land uses and along designated truck routes. *See* Attachment C at 23, 26–28.
  - Analyze and describe policies, practices, and investments that impact access to a healthy environment for protected groups. While the November Draft adds some data related to this, it lacks sufficient analysis (*see* discussion on the definition of the word analysis *supra* note 9). *See* Attachment C at 24–28.
    - Secondarily, the November Draft mentions that an Environmental Justice (EJ) Element will be completed by the City. This statement, however, is not sufficient to find compliance with this requirement; the City would need to have the EJ Element already completed and be able to use specific citations to the compliant EJ Element to show the City has adequately considered EJ and access to a healthy environment for disadvantaged communities. *See* HCD AFFH Guidance at 11.
  - Consider impacts on access to a healthy environment regarding zoning, siting and operation of noxious land uses in disadvantaged communities, and climate change. *See* Attachment A at 8–9; Attachment C at 26–27.
  - Analyze the basis for pollution disparities impacting the City of Fresno itself, including West Fresno, Jane Addams, and South East Fresno. *See* Attachment C at 27.
  - Consider how policies, practices, and investments or disinvestments relating to access to green space, tree canopy, and climate resiliency (including adequate cooling

[40] Thrivance Group, Here to Stay: A Policy-Based Blueprint for Displacement Avoidance in Fresno (2021), https://www.transformfresno.com/wp-content/uploads/2021/06/transform-fresno-here-to-stay-report-english.pdf.

[41] The November Draft does mention this as a concern for students traveling to school but does not analyze this for the public as a whole. November Draft at 1E-3-33.

and wildfire smoke protection) impact educational opportunities at schools, especially in low-income neighborhoods. *See* Attachment C at 27.

- **Other Relevant Factors and Local Knowledge**
    - Consider current, planned and past developments, investments, policies, practices, demographic trends, public comments, and other factors to inform the Local Knowledge section—the November Draft added a couple statements related to this, but they are not sufficient. *See* HCD AFFH Guidance at 45.
    - Consider any other factors impacting socio-economic patterns and segregation relating to accommodating the RHNA—this can include pending or approved plans, other elements of the general plan, relevant portions of the housing element and site inventory analysis (e.g., effectiveness of past programs, suitability of sites, existing uses and impacts of additional development potential, including potential for displacement of residents, businesses and other community amenities and infrastructure capacity). HCD AFFH Guidance at 46.
- **Site Compliance with AFFH Duty**
    - Consider the impacts of integration and segregation on the distribution of Hispanic/Latino households more thoroughly; and consider the impact on relative integration and segregation of other races—as the November Draft does not consider other racial/ethnic communities. November Draft at 1E-3-101 to 1E-3-104; *see* Attachment C at 28.
    - Acknowledge how the lack of lower-income sites identified in high-resource areas, will perpetuate patterns of RCAAs and R/ECAPs. *See* Attachment C at 28.
    - Analyze the impact of site locations on access to specific forms of access to opportunity. *See* Attachment C at 28.
    - Analyze the impacts on access to a healthy environment of siting housing in low-income neighborhoods with poor environmental health indicators, industrial zoning near homes, heavy traffic, and major highways. *See* Attachment C at 28.
    - Analysis how absent or incomplete infrastructure, services, and amenities impact access to opportunity on sites included in the inventory. *See* Attachment C at 28.
    - Include discussion of local knowledge and community input, pending development, development potential and other relevant factors. *See* Attachment C at 29.

The AFH is designed to analyze inequities related to fair housing, identify contributing factors to these inequities, prioritize those factors based on public comment and highest need, and create programs that are justified by those prioritized factors. The City is grossly out of compliance with the legal requirements of the AFH due to the following:

- A failure in both the July Draft and the November Draft to adequately complete the analyses of fair housing issues in the City of Fresno.

- A failure in identifying all contributing factors[42] to the fair housing issues in the City of Fresno—in fact, the City continues to egregiously fail in this regard with the addition of data and information in the November Draft that provides evidence of more housing issues but a failure to identify any new contributing factors.
- A failure to prioritize, and explain its prioritization process, contributing factors based on community input, the AFH, and the sites inventory.
- A failure to adequately justify—linking the contributing factors to policy and meaningful actions—the implementation programs with meeting the needs addressing the contributing factors to fair housing issues.

We recommend substantial revisions to the AFH if the City wishes HCD to find its Housing Element compliant with state law. HCD will not accept an AFH if it finds that the AFH or a portion of the AFH is inconsistent with fair housing or civil rights requirements or is substantially incomplete. For example, an AFH will be found inconsistent with fair housing and civil rights requirements if it does not identify policies or practices as fair housing contributing factors,[43] even though they result in the exclusion of a protected class from areas of opportunity. Compliance with Housing Element law is listing contributing factors *with* robust analysis so jurisdictions can create programs with meaningful actions. HCD AFFH Guidance at 51.

Thus, the November Draft's noncompliance with the above-mentioned components of the AFH results in the City being in violation of the Housing Element Law, Gov't Code § 65583 et seq., the Duty to AFFH statute, Gov't Code § 8899.50, California's nondiscrimination statute, Gov't Code § 11135, the Fair Employment and Housing Act, Gov't Code § 12940 et seq., the Federal Housing Act, 42 U.S.C. § 3601 et seq., and Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000(d) et seq. Therefore, we recommend the City properly analyze all fair housing issues, identify and prioritize contributing factors to those fair housing issues, and justify the programs as addressing the contributing factors and adequately overcoming patterns and practices of segregation and creating areas of opportunity for R/ECAPs.

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[42] *See e.g.,* HCD AFFH Guidance at 68–70 (listing Contributing Factors examples).

[43] Contributing factors are not limited to public actions. *Id.* at 51. Private actions can also contribute to patterns of segregation, racially or ethnically concentrated areas of poverty, disparities in access to opportunity, and disproportionate housing needs. *Id.* at 51. While public agencies do not directly control private actions or contributing factors beyond a locality's boundaries, the actions of public agencies can influence private action and have impacts beyond local boundaries. *Id.* at 51. As a result, regardless of whether contributing factors are public or private or local, region, state or federal, the housing element must recognize a broader social and legal obligation to affirmatively further fair housing and still identify and prioritize those contributing factors to commit to commensurate goals and actions. *Id.* at 51.

C. The Housing Element's Analysis of Past Accomplishments and Programs Is Inadequate.

The Housing Element requires a review of the previous housing element for progress in implementation, effectiveness of programs in meeting goals, and appropriateness of modifying programs for the current planning period. Localities should make a specific effort to gather input from all segments of the community on the effectiveness of these programs and how to make adjustments moving forward. HCD AFFH Guidance at 22; *see* 80 Fed. Reg. at 42356.

The City fails to properly look at its past actions and programs both in the Housing Element Past Accomplishments section as a whole as well as specific analyses in the AFH that require addressing past programs; those specific analyses include failing to address "public participation, past policies, practices, [and] investments" as required in its R/ECAPs and RCAAs AFH analysis. HCD AFFH Guidance at 33; *see* Attachment C at 14. It also fails to inspect the "effectiveness of past programs in achieving the goals of the housing element" as a factor influencing the impacts of the identification of sites to accommodate the RHNA on socioeconomic patterns and segregation. HCD AFFH Guidance at 33; *see* Attachment C at 14. We recommend the City adequately analyze why its past programs have continued segregation and not adequately facilitated integration, healthy communities, and access to opportunity.

IV. The City Fails to Demonstrate Site Capacity to Accommodate Its RHNA and Show Its Sites Inventory is Consistent With the Duty to AFFH.

While the AFH is robust and the revised draft adds a lot of good information, data, and analysis, it applies very little of it to actions. Programs fail to address the need, sites are inadequate, and constraints aren't properly removed.

Government Code section 65583(a)(3) requires an assessment of the available land that is suitable and available to accommodate the RHNA. Additional information is required for the City's Revised Draft Element to comply with the statute. In brief, the following is still required:

- Analysis demonstrating the viability of non-vacant sites.
- Evidence of approval during the projection period credited against the RHNA.
- The viability of large sites, especially in light of the concentration of these sites in one area of the City.
- The impact of environmental constraints on inventory sites (and proximity to incompatible uses) on the overall availability of inventory sites.

Several of these issues were raised in our comment letter regarding the publicly available draft circulated in July 2023 and the November Draft fails to provide the additional necessary analysis highlighted in our comment letter.

For instance, the City's projection period began on June 30, 2023, but numerous projects that we highlighted on page 10 of our August 2023 that have not received approvals since the beginning of the project period and yet are still included in Table 1E–2.3. *See e.g.*, San Joaquin Hotel—submitted entitlement review in December 2022, review not completed; Los Pueblos Apartments—project submission deemed incomplete in 2022, waiting for resubmittal; *see also* Attachment C at 10. None of the projects we highlighted were removed from Table 1E–2.3 despite the fact that they have not received approvals during the projection period. *See* HCD's Housing Element Sites Inventory Guidebook, available at https://www.hcd.ca.gov/community-development/housing-element/housing-element-memos/docs/sites_inventory_memo_final06102020.pdf.

Because many of the zoning designations do not have a minimum density the City provides an alternate method to estimate capacity on sites by looking at projects during a very limited time frame—2018 to 2020. An alternate calculation is permitted but it should evaluate the average capacity for each zone based on a more expansive time period to make sure the calculation accurately reflects the development patterns that a two -year time frame cannot do. *See* Attachment C at 10.

Also noted in our August 2023 letter remains the City's incomplete analysis of non-vacant sites, which relies primarily on describing the existing use and does not consider the other required factors included in Government Code section 65583.2(g). *See* Attachment C at 11.

The City also relies on several large sites that are in close proximity to each other to accommodate its RHNA for lower income households. Not only are there obstacle to obtaining the highly competitive funding for affordable housing to build projects of more than two hundred units, as a large site would necessitate, but including so many large sites in close proximity triggers another constraint to receiving funding and certainly creates an impediment to further fair housing if so many units intended to accommodate the lower income housing need are in one concentrated area. *See* Attachment C at 12.

Although the City did revise its original draft element to include one example of development on a large site Fancher Creek Town Center. But this does not address the comment we previously raised regarding the concentration of large sites in one area of the City and the resulting concentration of sites to accommodate the lower income RHNA in one section of the City and the inconsistency with the City's duty to affirmatively further fair housing.

The November Draft describes one half of one large parcel as being occupied by two existing retail establishments, yet the Draft then goes on to determine that 60 percent of the site is available for infill housing even though existing uses occupy 50 percent of the site. November Draft at 1E-2-21.

The November Draft includes information about sites in close proximity to the airports and the accompanying restrictions on residential density in these zones. The Draft indicates sites will need to be removed from the inventory of available sites based on the Airport Land Use Compatibility Plan (ALUCP) but does not indicate how many sites and the capacity of those sites and whether it will result in a shortfall for any income category. This information is necessary before a final determination about the adequacy of the site inventory can be made.

HCD advises that the impact from a wide variety of environmental factors be considered when evaluating the suitability of sites in the land inventory. The November Draft considers sites in the floodplain, near airports, and infrastructure availability but HCD's Sites Inventory Guidebook requires more: "Other characteristics to consider when evaluating the appropriateness of sites include physical features (e.g., size and shape of the site, improvements currently on the site, slope, instability or erosion, or environmental and pollution considerations), location . . . ." HCD's Housing Element Sites Inventory Guidebook at 3. According to Figure 1E–2.2 Sites Inventory, Fresno 2023, there are many higher density and mobile home sites that are proximate to existing heavy industrial uses in South Fresno. To comply with the City's duty to affirmatively further fair housing sites for lower income households should not be identified close to known pollution sources since lower income families and individuals in South Fresno already face higher exposures to air pollution.[44]

V. The City Fails to Include Programs—With Definitive Timelines—That Remove Identified Constraints on Affordable Housing Production.

Existing federal law requires departments and agencies to administer programs relating to housing in a way that affirmatively furthers fair housing.[45] These obligations extend to state and local governments that receive funds or contract with the federal government. A.B. 686 extends the obligation to affirmatively further fair housing to all public agencies in the State of California. This affirmative duty is not limited to those agencies with relationships with the federal government and is to be broadly applied throughout agencies at the state and local level. Gov't Code § 8899.50(a)(2). Now, all public agencies must both (1) administer programs and activities relating to housing and community development in a manner that affirmatively furthers fair housing, and (2) take no action inconsistent with this obligation. Affirmatively furthering fair housing means "taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities." Gov't Code § 8899.50(a)(1). These new statutory obligations charge all public agencies with broadly examining their existing and future policies, plans, programs, rules, practices, and related activities and make proactive changes to promote more inclusive communities. Gov't Code § 8899.50(a)(1)–(2), (b), (c), (d); *see* HCD AFFH Guidance at 9.

[44] *CalEnviroScreen 4.0*, Cal. Off. of Env't Health Hazard Assessment (May 1, 2023), https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40.

[45] See Executive Order 12892 – Leadership and Coordination of Fair Housing in Federal Programs: Affirmatively Furthering Fair Housing. January 17, 1994.

In addition, the A.B. 686 updated the Housing Element law to specifically require the creation of programs to promote fair housing. Specifically, Government Code section 65583(c) states that:

> The [Housing] Element shall contain . . . . A program that sets forth a schedule of actions during the planning period, each with a timeline for implementation, that may recognize that certain programs are ongoing, such that there will be beneficial impacts of the programs within the planning period, that the local government is undertaking or intends to undertake to implement the policies and achieve the goals and objectives of the housing element . . . .

Goals and policies must be created with the intention to have a significant impact, well beyond a continuation of past actions, and to provide direction and guidance for meaningful action. HCD AFFH Guidance at 52. The Housing Element's implementation program must AFFH in accordance with Government Code section 8899.50 and include a diligent effort to achieve public participation of all economic segments of the community in the development of the Housing Element. Gov't Code § 65583(c)(9), (10)(A). Programs must address various statutorily mandated areas, such as identification of adequate sites, zoning for a variety of types, assisting development for lower and moderate income households, addressing governmental and non-governmental constraints, conserving the existing housing stock, preserving at-risk units, and promoting housing opportunities for all people. HCD AFFH Guidance at 10. Finally, the Housing Element requires identification of metrics or quantified objectives and milestones for determining what fair housing results will be achieved through these programs. HCD AFFH Guidance at 13.

Despite previous comment letters and specific identification by the public of prioritized fair housing issues, the November Draft remains noncompliant regarding its adequacy of meaningful actions and adherence to the requirements in creating the implementation programs. We have separated our recommendations into two subsections: (1) Programs that need to be added based on revision of the AFH and adequate identification of fair housing issues, *see* discussion *supra* Section III, identified and prioritized contributing factors to the fair housing issues, and direct justification of programs from the identified contributing factors; and (2) Programs included in the November Draft that can be improved.

A. The City Must Add Needed Implementation Programs to Adequately Address Prioritized Contributing Factors Informed by the Public.

The Housing Element requires an identification of priorities and goals based on identified contributing factors that limit or deny fair housing choice or access to opportunity, or that negatively impact fair housing or civil rights compliance. HCD AFFH Guidance at 12. The November Draft, like the July Draft, is grossly inadequate in fulfilling the requirements under

Government Code sections 8899.50 and 65583. The following includes the programs best suited to address contributing factors and prioritized community fair housing issues:

- **Most Up-To-Date Priorities Identified by City of Fresno Residents at LCJA's December 5, 2023 Community Meeting:**
    - Holistic Tenant Protections
        - Adopt a local rent stabilization ordinance, including a rent stabilization board to hear and approve rental increases submitted by landlords.
        - Adoption of just cause eviction
        - A right to counsel guaranteeing access to affordable legal counsel for low-income tenants in housing matters.
        - Establish a permanent emergency rental assistance program.
        - Know-Your-Rights education and enforcement for discrimination against pet ownership in rental properties. Currently, California law says: "Landlords are not allowed to outright refuse to rent to tenants based solely on their ownership of pets. However, landlords may impose reasonable restrictions and conditions for pet ownership, such as size or breed restrictions allowing pets, with some exceptions for service animals or emotional support animals."[46]
        - More enforcement against landlords and property management companies who discriminate against or harass tenants; including a focus on harassing surveillance of tenants and privacy issues.
        - Add back in July Draft's Program 30: Emergency Rental Assistance Program.
    - Homelessness
        - Providing housing to unhoused veterans
        - Build Tiny Home Villages.
    - Housing Stock
        - Increase the supply of rental properties that allow pets.
        - Consider creating tax incentive programs or reward/relief programs for landlords and management companies who allow pets.
        - Build the housing stock with the majority age demographic, 25 to 44 years (November Draft at 1E-0-1), in mind; build less single-family homes and build more duplexes and triplexes.
- **Community Priorities as Referenced in Previous Comment Letters**
    - Reducing barriers for undocumented immigrants to rent. *See* Attachment C at 3.
    - Pursue an Inclusionary Zoning ordinance. *See* Attachment A at 8.
    - Extreme heat and weatherization programs to address climate change. *See* Attachment A at 8; Attachment C at 24, 26, 35.

[46] *See e.g.*, HCD AFFH Guidance at 72–74 (listing Housing Action Examples).

- Establish an acquisition and rehabilitation fund to purchase older, blighted, or abandoned homes/buildings. *See* Attachment A at 8.
- Grants for residents who want to develop affordable accessory dwelling units on their land. *See* Attachment A at 8.
- Urban Greening as buffer zones for residences zoned near polluting land uses. *See* Attachment A at 8.
- Prohibit siting industrial uses next to Housing Element sites used to accommodate the RHNA. *See* Attachment A at 8.
- Suitable Vacant Land should be prioritized for affordable housing in order to bring Very Low Income and Low Income RHNA allocations into compliance. *See* Attachment A at 9.
- Impact fees should be placed into a community benefit fund when polluting land uses and practices are placed near housing. *See* Attachment A at 9.
- Developing Public Health Impact Reports for new development. *See* Attachment A at 9.
- Establish a Cargo/Freight Prohibition and Revenue Tax. *See* Attachment A at 9.
- Incorporate Complete Streets principles into all transportation projects at all phases of development. *See* Attachment A at 9.
- Establish a Housing Element Implementation Committee to oversee[47] the timelines and implementation of each program and policy. The committee should be comprised primarily by tenants, low-income homeowners, and at-risk populations to ensure implementation meets the needs of most at-risk communities. *See* Attachment A at 9.

B. The November Draft Must Revise Implementation Programs Which Are Noncompliant and Should Strengthen Programs Which Could Better AFFH.

The November Draft, like the July Draft, is noncompliant under Government Code sections 8899.50 and 65583 regarding some of its implementation programs. We also wanted to identify programs that could be strengthened to better accomplish residents' priorities and better move toward overcoming segregation and creating areas of opportunity for R/ECAPs. We do not have any new recommendations for the November Draft's Programs 2, 17, 19, 22, 23, 27, 29, and 32 beyond the recommendations in our previous comment letters; please reference Attachment B and Attachment C for those comments as well as additional comments on the Programs we do address below. The following includes the programs with the recommended changes to policy, goals, and

[47] The plan must describe the standards and procedures that the jurisdiction will use to monitor activities carried out in furtherance of the plan, including strategies and actions that address the fair housing issues and goals identified in the AFH, and that the jurisdiction will use to ensure long-term compliance with requirements of the programs involved, including civil rights related program requirements, minority business outreach, and the comprehensive planning requirements. *See* 80 Fed. Reg. at 42365.

concrete steps best suited to address compliance, contributing factors, and prioritized community fair housing issues:

- **Missing Required Programs**
    - **Addressing Governmental and Nongovernmental Constraints**
        - As the AFH did not fully identify and analyze governmental and nongovernmental constraints and concluded that the few identified constraints were either not significant or were being addressed, the Action Plan did not include a program(s) to remove them. The November Draft does not adequately meet the requirements of Government Code section 65583(c)(3) to address and remove constraints.
        - Program 25 provides some limited development code amendments to remove barriers to housing development, but these are a far cry from addressing and removing the myriad constraints to affordable housing development.
        - Consider adding a program(s) relating to the identified governmental and nongovernmental constraints identified in Section III.A. *supra*.
    - **Emergency Rental Assistance Program**
        - This program was removed entirely from the July Draft to the November Draft. This program should be included in the next Housing Element draft as tenant protections is an identified community priority.
- **Program 1 – Maintain Adequate Sites**
    - Create a strategy to work with unwilling developers when rezoning.
    - Create a strategy for responding to YIMBY's when conducting comprehensive outreach.
    - Define who the City is reaching out to during comprehensive outreach.
    - Define what the City is seeking input on during the outreach.
    - Develop a robust outreach strategy to ensure varied and inclusive outreach as required by law, ensuring a diligent effort is made by the City to seek input from communities with protected characteristics and fulfilling its duty to AFFH. Gov't Code § 65583(c)(9)–(10).
- **Program 3 – Encourage and Facilitate Accessory Dwelling Units**
    - Specify targeted areas to promote public outreach for the educational program around the opportunity for ADUs; this is a reasonable and measurable outcome, while promoting to all parts of the city is vague and hard to enforce.
    - Match funds with Housing Choice Vouchers for ADU units in high resource areas for landlords that make ADUs deed restricted affordable for low- or very-low-income households, in addition to waiving inspection fees.
    - Advance the City's free ADU standard plans for farmworker dwelling units and cottage communities by adding a section describing these structures, showing

pictures, and including the plans on the City's ADU Programs website (i.e., making this a more concrete commitment than simply "encourag[ing]" the use of the plans).
    - Define what a farmworker dwelling unit is.
    - Create additional incentives for landlords who accept Housing Choice Vouchers to make it more feasible for low-income households.
    - Institute an advertising plan so all communities, especially R/ECAPs, are aware of the ADU resources on the City's website, ADU hotline, and ADU email to answer questions.
    - Waive inspection fees for landlords of low-income properties immediately upon adoption of the Housing Element (i.e., removing the unnecessary waiting of the timeline to start waiving fees in July 2024).
    - Provide financial support to farmworkers in poverty status who want to build ADUs—who otherwise would not have the downpayment to build ADUs.
- **Program 5 – Large and Small Lot Development**
    - Revise objective (of 600 units) to build 800–1,000 lower-income units.
    - Create enforceable outcomes in the timeframe section—e.g., create a permanent fund for assisting nonprofit developers by January 1, 2025; build 200 units by December 31, 2025; build 400 units by December 31, 2027, etc.
- **Program 8 – List of Local Labor Unions and Apprenticeship Programs**
    - Host in-person and virtual webinars highlighting the benefits of hiring local labor and best practices for establishing these programs and working with labor unions (i.e., making this a more concrete commitment than simply "encourag[ing]" the hiring of local labor).
    - Define what "hire local labor" means (e.g., state whether there is a connection to labor unions and apprenticeship programs).
- **Program 9 – Use of Sites in Previous Housing Elements**
    - Edit the second paragraph to be compliant with Government Code section 65583.2(c). It should read (important components bolded for emphasis):
        - The City will implement a zoning amendment to **permit developments by right** where 20 percent or more of the units are affordable to lower-income households on any **vacant sites** identified in the lower-income inventory of the **4th and 5th RHNA cycles** and and **non-vacant sites** identified in the lower-income inventory of the **5th RHNA cycle** as part of the Housing Element.
- **Program 10 – Annual Reporting Program**
    - Develop a robust outreach strategy to ensure varied and inclusive outreach as required by law, ensuring a diligent effort is made by the City to seek input from communities with protected characteristics and fulfilling its duty to AFFH. Gov't Code § 65583(c)(9)–(10); HCD AFFH Guidance at 18.
    - Evaluate, modify, and revise Housing Element implementation programs based on input received from the public. HCD AFFH Guidance at 51.

    - The Housing Element Does Not Currently Provide for Adequate Public Participation Regarding the Implementation Programs from 2023–2031.
- **Program 11 – Incentives for Housing Development**
    - Host in-person and virtual webinars highlighting the incentives for housing development and best practices for utilizing these and where to access additional resources on the City's website (i.e., making this a more concrete commitment than simply "post[ing] and maintain[ing]"a list).
- **Program 12 – Local Housing Trust Fund**
    - Revise objective (of 320 units total) to build 300–400 extremely low-, 400–500 very low-, and 400–500 low-income housing units.
- **Program 14 – Partnerships with Affordable Housing Developers**
    - Revise objective (of 1750 units) to build 1900–2000 very low-income units.
- **Program 20 – Housing Choice Voucher Incentive Program**
    - Revise objective section: It should be clear that the City, itself, will enforce source of income laws and the City will work with the Fresno Housing Authority on outreach and educational opportunities regarding HCVs.
- **Program 24 – Special Needs Housing**
    - The November Draft's insertions are vague, unenforceable, and have unclear outcomes. Words needing more specificity, defining, or measurable outcomes are bolded.
        - The City will **support** and **work actively** to identify the housing needs of farmworkers in Fresno and will **cooperate** with public and private agencies to seek funding to **identify and implement strategies** leading to the provision of housing for farmworkers.
        - The Mayor's Office of Community Affairs **will assist in engaging** all residents of the community including youth, Black, Indigenous, People of Color (BIPOC), Latino, Asian/Pacific Islander, Indian, and LGBTQ on their housing needs.
- **Program 30 – Mobile Home Parks**
    - Define specific aspects of the rehabilitation resources and repair program—e.g., heat resiliency, weatherization, insulation, repairs for inspection violations or other habitability concerns.
    - Establish a Mobile Home Park Improvement Program focused on community resources such as green space, parks, transit access, infrastructure and other resource improvements.
- **Program 33 – Homeless Assistance**
    - Establish a safe parking program (i.e., provides an enforceable and measurable outcome as opposed to merely "explor[ing] the feasibility" of a program.
    - Define what services would be provided during the safe parking program to help individuals find permanent housing.

- Provide a timeline for conducting and completing the assessment for youth at risk of homelessness.

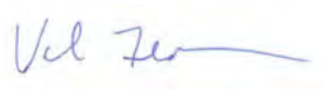
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Thank you for your consideration of our comments. We look forward to discussing them with you and continuing to work with the state and the City to ensure that the City adopts a Housing Element that fully complies with the law and addresses the serious housing needs and disparities that impact the City of Fresno's residents.

Sincerely,



Jasmine Robinson
Legal Advocate/Legal Fellow Sponsored by Weil, Gotshal & Manges LLP
Leadership Counsel for Justice & Accountability



Valerie Feldman
Staff Attorney
Public Interest Law Project

City of Fresno Community Residents
Yonas Paulos, Southwest Fresno
Lisa Flores, Southwest Fresno
Estela Ortega, Ann Leavenworth
Ilda Villa, Southeast Fresno

CC: Ashley Werner, Directing Attorney, Leadership Counsel for Justice & Accountability
Ivanka Saunders, Regional Policy Manager (City and County of Fresno), Leadership Counsel for Justice & Accountability
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Robert Swanson, Deputy Attorney General, Department of Justice—California Attorney General's Bureau of Environmental Justice
Lucas Williams, Partner, Lexington Law Group

Attachment A

Comment Letter from Leadership Couns. for Just. & Accountability et al. to the Fresno Cnty. Bd. of Supervisors, the Cities of Fresno Cnty. City Councils, & Deputy Dir. Kristine Cai of the Fresno Council of Gov'ts (Oct. 3, 2022) (on file with author).

ACLU AMERICAN CIVIL LIBERTIES UNION Northern California

LEADERSHIP COUNSEL FOR JUSTICE & ACCOUNTABILITY

POWERCA ACTION

FAITH IN THE VALLEY

TENANTS TOGETHER
California's Statewide Organization for Renters' Rights
www.tenantstogether.org

FRESNO BARRIOS UNIDOS
Advocacy • Education • Wellness

Building Healthy Communities FRESNO

October 3rd, 2022

Board of Supervisors, Fresno County
City Councils, Cities of Fresno County
Deputy Director Kristine Cai, Fresno Council of Governments

Re: Fresno COG Multi-Jurisdictional Housing Element Update 2023-2031

Dear Supervisors, Councilmembers, and Kristine Cai:

The undersigned organizations write to you to advocate for a Housing Element process and update that is equitable, inclusive, and responsive to disadvantaged communities' needs. We are a group of community-based organizations working hand-in-hand with community partners and leaders throughout the City and County of Fresno. The following recommendations are based on our experience to push for transformative community-led and identified solutions to elevate and advance their priorities for safe, affordable housing options and fair housing choices. We thank you for taking the time to read the following memo and welcome the opportunity to discuss our letter in further detail. As the Housing Element process begins, it is important and necessary to start the process correctly and with strong community engagement. The Housing Element is an important piece of planning our communities and solving our housing crisis together. Further, the State of California has recently strengthened the laws governing the Housing Element. The Fresno Council of Governments (FCOG), jurisdictions participating in this multi-jurisdictional housing element, and city leaders must apply these laws conscientiously and diligently. With laws such as AB 686 and AB 1397, we expect this Housing Element to be robust, meaningful, and indicative of solving our housing crisis. As always, we are willing to partner and work alongside you all to ensure that these requirements are fulfilled and even exceeded in order to create the change we want to see in the Valley.

We look forward to working alongside the Fresno COG, city leaders, and staff in the multijurisdiction Housing Element update (collectively referred to herein as "Fresno jurisdictions" or "jurisdictions") and solving our housing crisis together.

I. Jurisdictions Must Meaningfully Engage the Public in their Housing Element Updates Practices, Including Lower-Income Residents and Protected Classes

As Fresno jurisdiction begins the 6th Cycle Multi-Jurisdictional Housing Element Update, the jurisdictions must meaningfully engage the public, including in particular lower-income residents, members of protected classes under civil rights statutes, residents of disadvantaged communities, and racially and ethnically concentrated areas of poverty ("R/ECAPs"), and community-based organizations that work closely with these groups over the course of the housing element update. Gov. Code Sec. 65583(c)(9); HCD Affirmatively Furthering Fair Housing Guidance ("AFFH Guidance"), p.21.

The jurisdictions must engage the public throughout the housing element update process, and engagement must support "meaningful, frequent, and ongoing community participation, consultation, and coordination."[1] HCD, Building Blocks, Public Participation. Pursuant to HCD's AFFH Guidance, public participation efforts should be proactively and broadly conducted through various methods to ensure access and participation. Key stakeholders that jurisdictions seek to engage directly must include community-based organizations and advocacy groups which work directly with lower-income households and protected classes; lower-income and extremely-low income households; persons and households with special housing needs, including but not limited to farmworkers, seniors, single-parent households, and persons with disabilities; tenants, including residents of publicly-subsidized housing; members of protected classes, residents of disadvantaged communities and R/ECAPs; and fair housing agencies.[2] Outreach plans should include "in-person meetings in various locations to ensure residents from

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[1] HCD AFFH Guidance, p. 10; Gov. Code §8899.50(a),(b),(c); see also AFFH Final Rule and Commentary (AFFH Rule), 80 Fed. Reg. 42271, 4253-42360 (July 16, 2015)

[2] HCD AFFH Guidance, p. 21

across the jurisdiction have the opportunity to participate."[3] As the process begins, we ask that jurisdictions plan in-person workshops in all parts of the jurisdictions, especially in rural areas where internet access is scarce, and virtual options are impractical.

To satisfy Government Code § 65583(c)(9) and its duties to Affirmatively Further Fair Housing, some specific public outreach efforts that we recommend that jurisdictions undertake to achieve the above-referenced objectives include but are not limited to the following:

- holding interactive housing element workshops in at least three disadvantaged unincorporated communities (DUCs) in areas across the jurisdictions, including fringe and island communities located adjacent to or near participating cities and legacy communities as defined by Government Code § 65302.10. Residents living in DUCs, as well as other lower-income communities and neighborhoods, are most likely to attend workshops held in their own communities because many low-income residents in these communities lack personal vehicles and many DUCs are not served by efficient or reliable public transportation. The jurisdictions should partner with community residents and/or community-based organizations with ties to the community to plan and perform effective outreach for the workshops;
- conducting targeted outreach to and stakeholder interviews with members of special needs populations and protected classes, including but not limited to farm workers, the elderly, members of large families and single-headed households, people of color, and non-English speakers;
- soliciting completion of the community survey performed by the jurisdictions by low income and special needs residents, including by the jurisdictions' housing division and other city and County staff during their interaction with residents in the course of performance of their duties.
- advertising opportunities to participate in and provide feedback on the housing element update in non-English language print media, radio, and television, including media in Spanish, Hmong, and other languages spoken by Fresno County residents. Examples of non-English media outlets include Univision, Radio Bilingue, Hmong TV, and the Vida en el Valle publication among others. Many of these media outlets offer free advertising

[3] HCD AFFH Guidance, p. 10

space for public service announcements. The housing element should document these additional efforts to achieve public participation by all economic segments of the community and explain how input received through those efforts is incorporated therein.

Leadership Counsel is willing to support the jurisdictions in planning these additional public outreach efforts.

In addition, and importantly, the Draft Amendments must meaningfully **incorporate** public input provided on the housing element update, prioritizing input provided by lower-income residents, residents with special housing needs, protected classes, and residents of lower-income and disadvantaged communities. The housing needs analysis sites inventory analysis, assessment of fair housing, including discussion of fair housing issues in R/ECAPs and impacting protected classes, displacement risks, disparities in access to opportunity impacting protected classes, meaningful actions, and programs must all incorporate, reflect, and respond to resident input and priorities. The Multi-Jurisdictional Housing Element must incorporate input from residents from all participating jurisdictions to tailor the analysis, sites inventories, actions, and programs applicable to specific jurisdictions accordingly.[4]

The jurisdictions, cities, and the Fresno COG can start to gain public trust if steps to proactively engage the public, including on an ongoing basis, in the multi-jurisdictional housing element update and incorporate and significantly reflect public input provided. Jurisdictions must ensure that strong public engagement efforts are maintained following jurisdictions' adoption of the element, including, for example, through the incorporation into the housing element of actions committing to the establishment and facilitation of a housing element oversight advisory committee to assist the jurisdictions in obtaining community feedback on housing element implementation from lower-income residents and protected classes.

II. The Multi-Jurisdictional Housing Element Update Must Comply with Cities' and the County's duties under AB 686

[4] HCD AFFH Guidance, p. 21

To avoid the continuation of past and current discriminatory practices and to overcome their legacy, the State of California enacted AB 686 (2018). AB 686 requires the state, cities, counties, and other public agencies to affirmatively further fair housing ("AFFH") in all programs and activities relating to housing and community development. AFFH means taking meaningful actions, in addition to combating discrimination, that overcomes patterns of segregation and fosters inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. It means taking meaningful actions that, taken together, addresses significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws. AB 686 also amended the Housing Element Law to require that housing elements include an assessment of fair housing ("AFH") and identify sites *throughout* the jurisdiction to satisfy its regional housing needs allocation. We recommend that jurisdictions and FCOG carefully review HCD's AFFH Guidance which contains a detailed discussion of AB 686's requirements, including the requirements for a complete AFH. The AFH Some of these requirements include:

- **Summary of Fair Housing Issues.**[5] The Housing Element must analyze and address patterns of integration and segregation; racially or ethnically concentrated areas of poverty; racially concentrated areas of affluence, disparities in access to opportunity for lower-income residents and protected classes,; and disproportionate housing needs impacting lower-income residents and protected classes, including displacement risk. The analysis of disparities in access to opportunity must include disparities in access to educational, employment, transportation, and environmental opportunity and cover the specific topics identified in HCD's AFFH guidance for each opportunity category. HCD's AFFH Guidance, pp. 35-36. The disproportionate housing needs analysis must consider disparities in housing cost burdens, overcrowding, substandard housing, homelessness, and other issues and must evaluate displacement risks holistically, considering the impacts of rising rents, infrastructure and service deficiencies,

[5] https://www.hcd.ca.gov/community-development/affh/docs/affh_document_final_4-27-2021.pdf, pg.11

climate change, and other displacement risks that may disproportionately impact lower-income households and protected classes. The analysis must incorporate local data and knowledge, including the input of lower-income households and protected classes, and discuss the fair housing issues specific to distinct jurisdictions, R/ECAPs, and lower-income communities.

- **Identification and Prioritization of Contributing Factors.** The AFH must analyze and prioritize factors that contribute to identified fair housing issues and prioritize factors that limit or deny fair housing choice or access to opportunity or negatively impact fair housing or civil rights.
- **Sites Inventory AFFH Analysis.**[6] The housing element must not only demonstrate site capacity to accommodate each jurisdiction's RHNA, but also that the identified sites are consistent with the duty to AFFH, serving the purpose of replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity.[7] This evaluation must include the specific components described in the AFFH Guidance, including how sites better integrate the community considering historical patterns and trends; the extent to which sites may exacerbate existing patterns of segregation; whether the RHNA by income group is concentrated in areas of the community; and local data, knowledge, and community input. Based on the outcome of the analysis, the site inventory must be modified, and/or actions must be included to overcome patterns of segregation and barriers to opportunity in relation to the sites contained in the inventory.
- **Meaningful Goals and Actions**. Existing Housing Element Law requires programs with a schedule of actions with timelines and specific commitment to have a "beneficial impact" within the planning period to achieve the goals and objectives of the housing element. As stated in the AFH guidelines "actions implement goals and consist of *concrete steps, timelines, and measurable outcomes.*"

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[6] https://www.hcd.ca.gov/community-development/affh/docs/affh_document_final_4-27-2021.pdf, pg.12

[7] 24 Gov. Code, § 8890.50. subd. (b).

As the draft Housing Element is produced, we will be looking for these components and compliance with jurisdictions' duties under AB 686 to ensure that drafts reflect residents' input and priorities. Further, suppose barriers are identified that impede the application and implementation of programs, policies, and production of housing. In that case, the City should analyzealso analyze these barrierstempt to make a good-faith effort to find alternative solutions.

III. The Housing Element Must Analyze and Incorporate Programs and Policies That Adequately Respond to our Housing Crisis

As discussed above, the housing element must include programs and actions prioritized by lower-income residents, protected classes, and residents of lower-income communities and R/ECAPs during the housing element update to solve our housing crisis. Below are community-identified programs and policies which residents from South Fresno neighborhoods and disadvantaged unincorporated communities across the jurisdictions have repeatedly identified as priorities to solve our housing crisis and AFFH which we ask jurisdictions consider:

a. County of Fresno
    - Create or support expansion of **local funding opportunities for farmworker housing**. Farmworker housing should be accessible for migrant farmworkers and affordable.

b. City of Fresno and County of Fresno:
    - Adopt a **local rent stabilization ordinance,** to protect tenants from continuously rising rents, including a rent stabilization board to hear and approve rental increases submitted by landlords. This would apply to the City of Fresno and Fresno County.
    - Adoption of **tenant protections to reduce displacement risks,** including just cause eviction that address gaps in protections afforded under the 2019 Tenant Protection Act and a right to counsel guaranteeing access to affordable legal counsel for low-income tenants in housing matters;
    - Establish a **permanent emergency rental assistance program** to assist residents at risk of homelessness due to rent increases and changed circumstances and ability to pay. Identification of a permanent local source of funding will ensure

continuous funding and that the program can be used to prevent displacement. *The City of Fresno can leverage the Local Housing Trust Fund dollars and the State is continuing to grant monies for rental assistance programs*

- Establish a **permanent first-time homeownership assistance program** to help tenants become first-time homeowners. Closing costs and downpayment assistance for low-income, first-time homebuyers can help close the housing gap. Residents with ITIN numbers should be eligible for this program.
- Investments in **improvements to mobile home parks** to address the needs, including needs from the mobile park assessment study. Further, it should address weatherization and climate resiliency needs, to improve indoor and outdoor air quality, and to expand access to green space.
- Pursue an **Inclusionary Zoning ordinance** in the County of Fresno and the City of Fresno once a General Plan Update has occurred.
- **Extreme heat and weatherization programs** to address climate change. This includes funding for weatherization upgrades to homes and rental units, specifically in census tracts that rank the highest on CalEnviroScreen for pollution and poor health outcomes and are most vulnerable to climate change.
- **Establish an acquisition and rehabilitation fund** to purchase older, blighted, and/or abandoned homes/buildings. The County and the City of Fresno can establish a revolving fund to insure that rehabilitated homes are sold back to the community at a low cost.
- Grants for residents who want to develop **affordable accessory dwelling units** on their land in both the City and County of Fresno. Some residents are willing to sell parcels of land to the County to develop affordable housing and increase housing supply.
- **Urban Greening is used** as buffer zones when residential is placed or already placed near existing polluting land uses to mitigate health impacts.
- **Citing industrial uses** cannot be sited next to Housing Element sites and compliance with placing housing sites away from heavy, light industrial uses or phasing out light/heavy industrial zones















- **Suitable Vacant Land** should be prioritized for affordable housing in order to bring Very Low Income and Low Income RHNA allocations into compliance
- **Impact fees should be placed into a community benefit fund** when polluting land uses and practices are placed near housing. The community benefit fund will be managed by the community directly impacted to dictate to who these funds should be allocated.

c. All Jurisdictions:

- **Establish local hire provisions** requiring that a certain percentage of workers reside within 10 miles or less of a Project Site. This can reduce the length of trips, reduce greenhouse gas emissions and provide localized economic benefits
- **Developing Public Health Impact Reports** for new development in order to understand existing public health disparities and the potential of those conditions worsening as a result of development. Public health agencies should be resourced to support this analysis. The findings of these reports should be available publicly and be included in permit approval processes and other key decision-making milestones.
- **Establish a Cargo/Freight Prohibition and Revenue Tax** to directly fund community-based housing and projects in the neighborhoods most negatively impacted by years of environmental toxicity caused by freight.
- **Incorporate Complete Streets principles** into all transportation projects at all phases of development, including planning and land use decisions, scoping, design, implementation, maintenance, and performance monitoring.
- **Establish a Housing Element Implementation Committee** to oversee the timelines and implementation of each program and policy. The committee should be comprised primarily by tenants, low-income homeowners, and at-risk populations to ensure implementation meets the needs of most at-risk communities.

IV. The Sites Inventory Must Comply with New Housing Element Law Requirements, Including Requirements for Access to Infrastructure and Services Under AB 1397

As aforementioned, the State of California has added further requirements and specificity to the obligation of the Housing Element to identify adequate sites for further development of affordable housing.

Under AB 1397, for all sites in the inventory, the jurisdiction must determine the number of units "that can be realistically accommodated.[8] These requirements do not include "current or planned availability and accessibility of sufficient water, sewer and dry utilities."[9] In other words, sites that are served by water, sewer, and other dry utilities available and accessible within three years of the beginning of the planning period will be considered suitable for residential development. In addition, jurisdictions may not reuse on-vacant sites identified in a prior housing element or vacant sites identified in the last two housing element updates to meet lower-income RHNA requirements.

Finally, we recommend FCOG and the jurisdictions ensure that sites chosen conform to HCD's site inventory guidance. Following HCD's guidance would increase planning efficiency for local agencies, while ensuring compliance with housing element requirements. We look forward to seeing local compliance.

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Thank you for taking our comments into consideration. We look forward to continuing to work with the Fresno jurisdictions on developing a compliant Housing Element that responds to the needs of participating Fresno Jurisdiction Residents and ensures access to safe and affordable housing for all.

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[8] Cal Gov Code 65583.2(c)
[9] Cal Gov Code 65583.2(c)(2)

Sincerely,
Karla Martinez, Policy Advocate
Leadership Counsel for Justice and Accountability

Alexandra Alvarado, Community Organizer
Faith in the Valley

Marisa Moraza, Senior Campaign Strategist
PowerCA Action

Shar Thompson, CV Regional Coordinator
Tenants Together

Josefa Vega, Central Valley Regional Organizer
ACLU Northern California

Ruben Espinoza, Policy Advocate
Fresno Barrios Unidos

Guadalupe Ramos, Project Specialist
Fresno Building Healthy Communities

Attachment B

Comment Letter from Leadership Couns. for Just. & Accountability et al. to Mayor Jerry Dyer, Fresno City Councilmembers, & Michelle Zumwalt (Aug. 16, 2023) (on file with author).

August 16, 2023

Mayor Jerry Dyer
Fresno City Councilmembers
Michelle Zumwalt, Planning and Development Department
2600 Fresno Street, Room Fresno, CA 93721

RE: City of Fresno Draft 6th Cycle Housing Element

Dear Councilmembers, Mayor Dyer, and Ms. Zumwalt,

The undersigned organizations write to you to advocate for a Housing Element that is equitable, inclusive, and responsive to disadvantaged communities' needs. We are a group of community-based organizations working alongside community partners and leaders throughout the City of Fresno. Housing Element Law requires that cities and counties make a diligent effort to meaningfully incorporate public input provided on the housing element update, prioritizing input provided by lower-income residents, residents with special housing needs, protected classes, and residents of lower-income and disadvantaged communities.

Goals, policies and actions must be aggressively set to overcome those contributing factors to meet the "meaningful impact" requirement in statute and to avoid actions that are materially inconsistent with the obligation to affirmatively further fair housing. Goals and policies must be created with the intention to have a significant impact, well beyond a continuation of past actions, and to provide direction and guidance for meaningful action. AFFH Guidance, p. 52. The draft element's Housing Action Plan contains numerous actions that lack concrete steps and measurable outcomes and will not necessarily result in a beneficial impact during the planning period in violation of the Housing Element Law's standards. The following programs are inadequate and include our recommendations to improve them.

- **Program 1 - Maintain Adequate Sites.** Program 1 states that the City shall continue to maintain a current inventory of Housing Element sites to ensure that it can adequately accommodate the 2023-2031 RHNA" Given the impact of rezoning to the availability of and location of sites suitable for housing, the City should take additional steps to ensure transparency in decision-making related to proposed rezones and take diligent steps to provide notice of the proposed rezone along with an assessment of the potential impacts of the rezone on housing opportunity prior to a decision on the proposal. This includes but is not limited to public hearings and door to door canvassing to facilitate effective

notice. Further, the city must conduct a racial equity analysis which would include the benefits and disadvantages of the proposed rezone and whether it would result in displacement of protected racial/ethnic groups, reduce housing opportunities for protected groups, and how it would impact patterns of segregation. Finally, the program should explicitly prohibit the rezoning of sites suitable for lower income households to industrial land use classifications which would bring industrial uses next to or near neighborhoods that include or are planned for housing affordable to lower income residents. This is critical to ensure that the City is compliant with its duty to affirmatively further fair housing.

- **Program 2- Variety of Housing Opportunities in High Resource Areas *(identified in the AFH as a Meaningful Action).***
  The program states that the City "will identify and pursue opportunities" with affordable housing developers to promote the development of affordable units in high resource areas. Unfortunately, it does not provide any details on how they will in fact promote the development of affordable units for lower income households in high opportunity areas. There is no clear commitment to zone sites for multi-family development in areas of high opportunity or a commitment to ensure that such units are affordable to all income levels. Further, there is no commitment to match funding opportunties with the identification of available sites to facilitate their development. Notably, the City will not conform with its duty to AFFH if it does not ensure adequate sites for affordable housing for lower income residents in high resource areas. Without clear and enforceable commitments and timelines, this program will not provide a beneficial impact or further fair housing. Furthermore, in order to expeditiously address the lack of housing opportunities accessible to lower-income residents in high resource areas, the timeline of this program should be shortened.

  Accordingly, a specific objectives of this program should be changed to (a) assess the number of sites that must be rezoned in high resource areas (as identified in TCAC/ HCD's Opportunity Maps) to effectively AFFH , and (b) rezone the adequate number of sites pursuant to that analysis by December of 2025.

- **Program 3 - Encourage and Facilitate Accessory Dwelling Units (ADUs) (*identified in the AFH as a Meaningful Action)*.** While we support and encourage the development of ADUs, the program does not outline clear commitments that will yield identifiable beneficial outcomes. The program states "a primary objective of this program is to increase the supply of affordable units throughout the city" but fails to identify any

specific commitments to take any action on how this objective will be reached. Additionally, building ADUs is generally not an accessible housing option to low income households who cannot afford predevelopment costs associated with ADUs. We recommend additional measures in this program to make ADUs accessible to lower income households such as targeted outreach to low-income homeowners, incentives for landlords to make ADUs affordable, no interest loans for ADU development and waivers for inspection fees Additionally, a dedicated liaison in the Office of Community Affairs should be available for all questions regarding ADUs.

- **Program 8 - Use of Sites in Previous Housing Elements.**. Program 8 should be updated to clarify that streamlined approval will be available to both vacant and non-vacant sites through a zoning amendment. As written it appears that the zoning amendment will only apply to vacant sites included in the 4th and 5th cycle housing elements.

- **Program 9 - Annual Reporting Program.** While we appreciate the sentiment that the City will "engage all members of the Fresno community," and the specific commitment to use multilingual notices and media, the City should revise this program and avoid using vague language with no commitments. To make the public engagement associated with this program meaningful, we recommend that the program include a commitment and associated timeframe for the City to implement input received through its various outreach efforts such as workshops and surveys in addition to the annual public hearing. The annual report should include specific actions the City will take to overcome identified constraints and barriers to complying with Housing Element programs.

- **Program 10 - Incentives for Housing Development (*identified in the AFH as a Meaningful Action)*.**This program does not present a commitment to address housing production for low-income units or actions that will be taken to complete the program. To facilitate and promote the use of available incentives, the city should make a list of incentives, including density bonus incentives and impact fee waivers, available to the public through an accessible database.

  Additionally, the program's current language that it will "identify site opportunities in higher resource areas and …improve access to resources" suffers from the same issues hat program 2 does insofar as it fails to identify clear and enforceable commitments and steps that it will take to ensure the availability of sites for lower income households in high opportunity areas. It is critical for this program's success and the City's role in AFFH that the housing element includes clear, timebound, and enforceable actions to

ensure availability of sites for lower income households in high resource areas, as outlined above.

Finally, the City should include enforceable commitments to avoid displacement and gentrification in the Downtown Planning Area, and assess the role that priority processing in the area has on the City's duty to AFFH.

- **Program 11 - Local Housing Trust Fund (*identified in the AFH as a Meaningful Action)*.** The Local Housing Trust Fund is a great tool to alleviate the housing crisis and we are glad to see the City's commitment to leverage State matching funds. We recommend adding the creation of a Community Advisory Board as an action to ensure that projects are driven by a community process and benefit the most impacted residents. Housing advocates have met previously with City staff to develop an equitable Community Advisory Board made up of a diverse group of residents most impacted by housing barriers, legal experts, and small landlords.

- **Program 16 - Surplus Public Lands.** The commitment to release surplus sites appears to simply be a commitment to comply with its existing duties under the Surplus Lands Act. The language is ambiguous, non-committal and must be revised. In addition, the program states the City will "consider depositing a portion of up to 100 percent [of sale proceeds] to the LHTF" We recommend instead that the City commit to depositing 100 percent of sale proceeds into the LHTF.

- **Program 18 – Home Buyer Assistance (*identified in the AFH as a Meaningful Action)*.** While a critical program for many Fresnans, this Program should include additional commitments to ensure that low-income residents, undocumented residents, residents who speak languages other than English, and residents in racially and /ethnically-concentrated areas of poverty (R/ECAPs) have the opportunity to benefit from these funds. During the 5th Cycle planning period, many residents without social security numbers or who faced language access barriers were unable to apply for the City's homebuyer assistance program. While the City was able to assist nine families with this program, this program must incorporate mechanisms that will allow more families to apply during the next 8-year cycle by addressing barriers and pursuing state funds every year. This program has other deficiencies that must be addressed such as lack of public outreach and lack of interpretation for applicants applying by phone. Solutions include: ensuring that low-income residents are knowledgeable about the programs, undocumented residents are able to successfully apply for this program, including closing

costs as part of funding packages. In order to ensure that residents living in R/ECAPs are targeted, we recommend the City create annual reports listing how many applicants were assisted, outreach efforts made and whether they live in R/ECAPs. Due to the concerns outlined above, the program as currently implemented and drafted fails to adhere to HCD's AFFH Guidance that "actions must be specific with timelines, discrete steps and measurable outcomes to have a 'beneficial impact' during the planning period."

- **Program 19 – Housing Choice Voucher Incentive Program (HCV) (*identified in the AFH as a Meaningful Action)*.** This action fails to include meaningful actions with specific timelines, and measurable outcomes to have a "beneficial impact" during the planning period. The program should develop and implement a proactive enforcement program housed within that legal department to ensure HCV . The City should revise this program action to include a timeline of one workshop a month (twelve workshops throughout the year) to ensure residents and landlords are able to access housing quickly and better assist residents/landlords going through any issues that prevent them from using/accepting HCV. Additionally, collaborating with and funding CBOs and fair housing organizations to provide information to voucher holders and landlords on California's source of income discrimination prohibitions. The program should also commit the City of Fresno to finance billboard ads about protections against HCV discrimination and send informational materials to all landlords in Fresno registered in the rental registry regarding HCV. Finally, the program should be revised to include a commitment to actively pursue enforcement against discrimination against voucher-holders and supplementing vouchers with additional subsidies to support voucher use in higher-cost markets in high resource areas. Northeast Fresno has very limited HCV use, with only four census tracts north of Herndon Avenue containing any HCVs, and of those four tracts, no tract exceeds 5 percent HCV use. By revising the program to include the above recommendations would help address fair housing needs in Fresno.

- **Program 21 – Housing Rehabilitation (*identified in the AFH as a Meaningful Action)*.** Government Code section 8899.50 requires "'meaningful actions" well beyond combating discrimination to overcome patterns of segregation and foster inclusive communities. These actions, as a whole, must address significant disparities in housing needs and in access to opportunity." The current program has failed to address the needs of extremely low income residents and vulnerable populations such as undocumented residents. As we continue to see the negative effects of Climate Change across the world, it is imperative that the City include weatherization such as cooling mechanisms, like

heat pumps, air conditioning, insulation and other cooling assets to increase resilience to extreme heat as part of the rehabilitation program. It is a critical and urgent need given that extreme heat kills thousands per year and impacts disadvantaged communities the most. Additionally, the City must establish an acquisition and rehabilitation fund to purchase older, blighted, and/or abandoned homes/buildings. The City of Fresno can establish a revolving fund to insure that rehabilitated homes are sold back to the community at a low cost.Finally, for the program to have a beneficial impact the timeframe section should include 15 rehabilitation grants annually, and 5 distressed property grants using PLHA and CDBG funding for extremely low and low income residents.

- **Program 22 – Comprehensive Code Enforcement.** While we appreciate Code Enforcement's response and the City's diligence to keep increasing staff, there are still additional actions that should be taken to create a comprehensive code enforcement. HCD's AFFH Guidance recommends that "to overcome contributing factors to fair housing and affirmatively further fair housing, actions must consider a wide range of actions across all action areas. The number and scale of actions will depend on the severity of the needs but regardless of need, a cohesive and effective program will consider multiple action areas." This program as written continues to fail to address critical housing issues since the last housing element cycle. The program should be revised to include actions around legally holding landlords accountable for retaliation, unlawful evictions, and harassment towards tenants who file code enforcement complaints such as a commitment to adopt a tenant anti-harassment ordinance. As stated, we recommend that the City adequately analyze code enforcement's procedures and incorporate tenant feedback for a comprehensive code enforcement program.

- **Program 23 - Special Needs Housing (*identified in the AFH as a Meaningful Action)*.** Much of the language in this program is vague, noncommittal, and does not provide adequate actions in order to provide a beneficial outcome. This program states the City "shall advocate for provision of special needs," "partner with and encourage local and state non profits," and "provide/encourage." These actions are not concrete or specific and provide no assurance of a beneficial impact on persons' with disabilities access to housing. This should be revised to include review and enforcement of compliance with legal requirements for accessibility of multi-family and affordable housing, including in permitting processes, not just "encourage[ing]" accessibility features. Additionally, we recommend that the program add specific actions to remove barriers to housing by special needs groups such as allowing undocumented residents to apply for and receive

housing assistance, vouchers and other subsidies unless otherwise required by federal law.

- **Program 26 - Equitable Community Investments (*identified in the AFH as a Meaningful Action).*** Program 26 states it will "seek funding," "continue to actively seek resources," and "continue implementing the written policies." These commitments are vague and non-committal. There are no actions on how these will be completed and is ambiguous and as a result provides no indication that a beneficial outcome will result from the program and further fair housing. The programs continue not to commit the City to take a lead role in planning, funding, and/or constructing projects or indeed any role beyond identifying issues and needs and seeking funding on an annual basis. Additionally, it should not rely on the General Plan's identification of Priority Areas for Development Incentives in Chapter 12 and should instead use the Urban Displacement Project data to guide investments.

- **Program 28 – Opportunity To Purchase Act (OPA) (*identified in the AFH as a Meaningful Action).*** Although we appreciate the City's action to initiate research on a local Opportunity to Purchase Act, we strongly recommend that the City implements robust outreach and engagement, in partnership with CBOs that work closely with low-income communities in racially/ethnically-concentrated. Additionally, the program states it "shall research" and "consider establishing an OPA." These are not commitments and fail to implement any specific, firm, or enforceable commitment such that no beneficial outcome of the action is indicated.

- **Program 29 – Mobile Home Parks (*identified in the AFH as a Meaningful Action).*** Program 29 contains no commitments, actions, or enforceable language that will ensure a beneficial impact throughout the planning period. Additionally, this program repeats verbatim language included in Program 10A of the 2015-2023 without explaining how or why reliance on the same program action will have better results during the next planning period. With residents like Three Palms and Trails End Mobile Home Park experiencing the negative impacts of slumlords, it is crucial that the City make significant improvements to the program actions. Furthermore, the program must address the need for heat resiliency such as weatherization and insulation especially to older mobile home parks by funding a mobile home park renovation fund for all mobile homes. This fund will help low income families with issues that they need to address due to inspection violations or other habitability concerns. Additionally, this program should include a commitment to penalize and fine mobile home park owners who are not providing

adequate and safe conditions for their tenants. For example, Three Palms Mobile Home Park had not had safe drinking water for quite some time and the owner was never made responsible for this clear human rights violation. Finally, consistent with the City's responsibility to AFFH, the program should support quality of life and access to opportunity improvements for all mobilehome parks in Fresno by taking meaningful actions to increase green space, transit, and resources near mobile home parks.

- **Program 30 – Emergency Rental Assistance Program (*identified in the AFH as a Meaningful Action).*** Although we appreciate the City adding this program, it states that the City will "seek additional funding" and fails to commit ongoing funding that can come from the Local Housing Trust Fund, the General Fund, or its own permanent funding source to ensure a beneficial impact during the planning period. Identification and commitment of a permanent local source of funding by 2024 will highlight a commitment to prevent displacement and protect tenants.

- **Program 31 - Eviction Protection Program (EPP) (*identified in the AFH as a Meaningful Action).*** The Eviction Protection Program is a critical anti-displacement and anti-homeless tool. However, the program's current language to "seek additional funding to support the "EPP" is not a strong commitment and does not provide indication that a beneficial outcome will occur if funding is not replenished. We strongly recommend that the City commit to staffing 5 full-time staff for screening so tenants are able to receive help as soon as possible. We also recommend program expansion to include:
    - Wide-reaching outreach and education campaigns
    - Direct legal representation and assistance for low-income tenants encountering legal issues. This includes but is not limited to being served with a notice from their landlord (e.g. 3-day notice, notice of rent increase, etc.)
    - Evaluation of the Eviction Protection Program to ensure it is effective and address issues to improve the program.

- **Program 33 – Homeless Assistance (*identified in the AFH as a Meaningful Action).*** Program 33 does not commit the City to any concrete action. The program states it will "identify partnership opportunities," "leverage the homeless assistance response team" and "support the Voucher Incentive Program" none of which commit to any enforceable and actionable items. The city must commit to completing an adequate analysis of needs of unhoused City residents. This should include the completion of an AFH analysis of disproportionate needs.

- **Program 34 - At-Risk Housing.** Program 34 includes actions without a clear commitment to take steps that will lessen the severity or impact of the issue in any timeframe. Again, the language is non-commital, vague, and ambiguous in how the program will reach its objective. Additionally, stronger tenant protections should be included as an objective and completed no later than June 2024 for residents facing displacement and an affordable housing resource map for tenants so they have the option to relocate.

Additionally, the draft element lacks policies and programs identified in Leadership Counsel's February 2023 letter, attached hereto. We incorporate the policies and programs recommended in that letter here by reference. In addition to the policies and programs highlighted in Leadership Counsel's February 2023 letter, the draft element should also be revised to include the following programs:

A. Rent Control and Just Cause Protection Ordinance. The Housing Element draft mentions tenant protection "strategies" but in no way does the draft commit to tangible solutions. City of Fresno tenants, along with advocates, have been demanding rent control and just cause ordinance since 2021. The Here To Stay Report lists this as the communities' top priorities. Tenants have attended City Council meetings for the past two years asking for this; they have met with every city council member; and have lifted this as a priority in the City's Housing Element workshops. Yet, the City refuses to acknowledge residents' need. We strongly recommend that the City incorporate this into the Housing Element.
B. Inclusionary Zoning Ordinance. The City should adopt a program to develop and adopt an inclusionary zoning ordinance by a date certain that is no more than three years into the planning period in order to allow the ordinance to result in the production of lower-income units during the planning period. To ensure that the ordinance AFFH and maximizes the production of affordable units, the ordinance should apply to single-family and multi-family housing and require a minimum share of affordable units (approx. 25-30%) and affordability levels of those units, including affordability for very-low and extremely-low income households. The City should develop this ordinance in partnership with lower-income residents and CBOs.
C. Urban Greening is used as buffer zones when residential is placed or already placed near existing polluting land uses to mitigate health impacts.
D. Citing industrial uses. Programs should explicitly prohibit the rezoning of sites suitable for lower income households to industrial land use classifications which would bring industrial uses next to or near neighborhoods that include or are

planned for housing affordable to lower income residents. This is critical to ensure that the City is compliant with its duty to affirmatively further fair housing.

E. Impact fees should be placed into a community benefit fund when polluting land uses and practices are placed near housing. The community benefit fund will be managed by the community directly impacted to dictate to who these funds should be allocated.
F. Establish local hire provisions requiring that a certain percentage of workers reside within 10 miles or less of a Project Site. This can reduce the length of trips, reduce greenhouse gas emissions and provide localized economic benefits
G. Developing Public Health Impact Reports for new development in order to understand existing public health disparities and the potential of those conditions worsening as a result of development. Public health agencies should be resourced to support this analysis. The findings of these reports should be available publicly and be included in permit approval processes and other key decision-making milestones.
H. Establish a Cargo/Freight Prohibition and Revenue Tax to directly fund community-based housing and projects in the neighborhoods most negatively impacted by years of environmental toxicity caused by freight.
I. Incorporate Complete Streets principles into all transportation projects at all phases of development, including planning and land use decisions, scoping, design, implementation, maintenance, and performance monitoring.
J. Establish a Housing Element Implementation Committee to oversee the timelines and implementation of each program and policy. The committee should be composed primarily by tenants, low-income homeowners, and at-risk populations to ensure implementation meets the needs of most at-risk communities.

As discussed previously, each program must contain clear action steps, deadlines, and measurable outcomes that will be achieved within the planning period and address housing and fair housing needs prioritized during the public process.

* * * * *

Thank you for your consideration of our comments. Please contact us if you would like to find a time to discuss them. We look forward to working together to advance access to safe, affordable housing for all City of Fresno residents.

Sincerely,
Karla Martinez, Policy Advocate
Leadership Counsel for Justice and Accountability

Edith Rico, Project Director
Building Healthy Communities

Shar Thompson, Central Valley Regional Coordinator
Tenants Together

Marisa Moraza, Campaign Director
Power California

Attachment C

Comment Letter from Pub. Int. L. Project & Leadership Couns. for Just. & Accountability to Mayor Jerry Dyer, Fresno City Councilmembers, & Michelle Zumwalt (Aug. 16, 2023) (on file with author).

August 16, 2023

Mayor Jerry Dyer
Fresno City Councilmembers
Michelle Zumwalt, Planning and Development Department
2600 Fresno Street, Room Fresno, CA 93721

RE: City of Fresno Draft 6th Cycle Housing Element

Dear Mayor Dyer, Councilmember, and Ms. Zumwalt:

Leadership Counsel for Justice and Accountability write in collaboration with the Public Interest Law Project ("PILP") and residents of South Fresno neighborhoods impacted by the severe lack of decent quality, affordable, and permanent housing options and gaping disparities in access to opportunity in Fresno to provide comments on the July 2023 Draft Appendix 1-E: City of Fresno of the Fresno Multi-Jurisdictional 2023-2031 Housing Element ("City of Fresno Draft Housing Element" or "Draft Element").

Leadership Counsel works alongside the most impacted communities to advocate for sound policy and eradicate injustice to secure equal access to opportunity regardless of wealth, race, income, and place. Leadership Counsel advocates for policy and practice changes to meet the housing needs of all residents in Fresno, especially low-income and residents with special housing needs, and to overcome fair housing disparities that impact low-income communities of color. Residents with whom we partner experience high rates of cost burden and escalating housing costs, reside in unsafe and unsanitary rental housing conditions, and ever-present and magnifying displacement risks and are simultaneously impacted by striking disparities in access to opportunity compared to more affluent Fresno neighborhoods, including a lack of access to a healthy environment and public and private investment in critical infrastructure, services, and amenities.

The Public Interest Law Project (PILP) works statewide to support local legal programs that address issues involving housing, land use, public benefits and homelessness. PILP has been providing substantive training, litigation support, and technical assistance in these areas for over 25 years.

The City of Fresno's 6th cycle housing element update presents a critical opportunity for the City to identify and address long-standing, wide-ranging, and severe housing needs and fair housing disparities that impact the City's residents, disadvantaged communities, and racially and

ethnically concentrated areas of poverty ("R/ECAPs"), in particular, the Southwest, South Central and Southeast areas. The City must ensure that it does not miss this opportunity to develop and adopt a housing element that complies with the State Housing Element Law and civil rights laws and that meaningfully incorporates the input of lower-income residents and protected classes and the community-based organizations that work alongside them.

Our comments below highlight further steps and actions the City must take to meet State Housing Element Law requirements. In short, the Draft Element must be revised in order to meet Fresno's housing needs and relevant statutory requirements in several different ways, including:

- Incorporate input regarding key housing issues and disparities and actions needed to address those issues provided to the City by community members as required by HCD's AFFH Guidance;
- Revise the constraint analysis to address non-governmental constraints, as well as constraints on supportive housing and the maintenance of the housing stock.
- Revise the AFH analysis to consider all of the required displacement factors, barriers in access to opportunity, and fair housing issues associated with the Draft Sites Inventory;
- Revise programs to include specific actions and deadlines and add programs that will result in a beneficial impact on Fresno housing needs and disparities during the planning period and overcome patterns of segregation and foster inclusive communities, including but not limited programs 14, 15, 19, 23, 29, and 33;
- Revise the site inventory analysis to exclude projects that have not been approved during the projection period, include a realistic capacity calculation based on development throughout the 5th cycle, and determine the adequacy of the non-vacant site

I. The City Has Not Diligently Engaged the Public As Required, Because the Draft Element Fails to Adequately Reflect Public Input

The City's obligations to diligently engage all economic segments of the community and to affirmatively further fair housing through the housing element require more than just seeking input about the contents of the housing element. Government Code sections 65583(c)(8), 65583(10)(a) & 8899.50. Inviting residents to provide input but failing to incorporate that input into the housing element undermines the purpose of resident participation in the housing element update, fosters distrust, and fails to constitute "engagement" as required by section 65583(c)(8) of the Housing Element Law. HCD's Affirmatively Furthering Fair Housing ("AFFH") Guidance

states that housing elements must describe "a summary of [public] comments and how the comments are considered and incorporated (including comments that were not incorporated), particularly with changes to the housing element. HCD, Affirmatively Furthering Fair Housing: Guidance for all Public Entities and for Housing Element ("AFFH Guidance"), 2021, p. 22.[1] While the Draft Element provides some description of public input provided, its summary of public comments generally lacks sufficient detail for the reader to understand the nature of the issue raised or the solution proposed. In addition, the Draft Element fails to demonstrate the City's incorporation of input provided and to identify input the City chose not to incorporate as required. For example, at the March 1, 2023 community workshop on the housing element update held at Helm Home, residents identified the establishment of rent control, tenant assistance and protections, and reducing barriers to undocumented residents as among their top suggestions and solutions. The Draft Element fails to demonstrate how this solution will be incorporated into the final draft and to even to study the housing needs of undocumented residents.

The Draft Element also fails to acknowledge, discuss, or incorporate recommendations contained in the letter submitted to the City by Leadership Counsel and several other community-based organizations in February 2023 relating to the development of this Draft. *Attachment 1, Leadership Counsel February 2023 Letter.* The letter identifies policies and programs which the signatory organizations believe should be prioritized in the housing element update, based on our direct and daily work with low-income residents of color, farmworkers, residents of disadvantaged unincorporated communities, and other residents with special housing needs and members of protected classes. The City must revise the draft element to acknowledge this letter, summarize its contents, and revise goals, policies, and programs to incorporate its recommendations, in addition to other input it receives. The City must also revise the element to indicate what public input it chose not to incorporate, which the element currently fails to do.

II. The Housing Element Fails to Adequately Analyze and Remove Governmental Constraints to Housing Development

To fully comply with Housing Element law, the City of Fresno must identify constraints to the development of housing affordable to households at different income levels, as well as possible constraints to the development and maintenance of a variety of types of housing, including supportive housing, single room occupancy units, emergency shelters, and transitional housing. *See Gov't Code* §65583(a)(5) and (c)(1). This analysis includes potential and actual governmental constraints upon the maintenance, improvement, or development of housing for all

[1] All references to code sections hereafter refer to the Government Code unless stated otherwise.

income levels. Gov't Code § 65583(a)(5). Following a close analysis, the City must include a description of efforts to remove constraints and a program to remove those constraints. Gov't Code §65583(c)(3).

A. Land Use Controls Are Under-Analyzed as a Constraint

The Housing Element under analyzes the impacts of current and planned zoning regulations on housing development. A jurisdiction must include an analysis of potential and actual governmental constraints, including land use controls that directly impact the cost and supply of residential development. Gov't Code § 65583(a)(5). The constraints analysis fails to demonstrate the direct connection between its currently proposed zoning on cost and supply of housing.

The City has not adequately analyzed the effects of constraints associated with wide-spread availability of single family zoning and the limited availability of high density zoned sites. For example, the HE acknowledges "growth in the City of Fresno over the past few decades has traditionally been low density suburban development, which has resulted in conditions of sprawl in various areas of the city.[2] Despite the acknowledgement, the City continues to allow by right single-family units in. Despite the historical preference for single family development, the abundance of available single family homes in Fresno, and the underproduction of affordable housing,the the City still permits single family uses by-right in many of the zones identified for increased high-density development: RM-1, NMX, CMX, RMX, CMS, CR, DTN, DTG.

Further, although single family development is allowed in almost every zone that permits residential development, higher-density units are not allowed in certain areas in the City. For example, multi-family units are not allowed in RS-1, RS-2, or RS-3 areas, despite the large majority of the City being zoned one of these zones, and where many high resource areas have developed.[3] Duplexes are similarly constrained, they are excluded from RS-1, RS-2, RS-3, RS-4, and only allowed through conditional use permit in R-5.

Because both single-family and multi-family development is permitted in most residential zones, it puts multi-family developers in competition with single family developers for the same sites.

Single family units also benefit from reduced permitting timelines. For single--family developments it typically takes up to 30 days for developers to pull building permits after its

[2] Fresno Multi-Jurisdictional Housing Element July 2023, Appendix 1E: City of Fresno, 1E-4-1.
[3] City of Fresno, 2023. Data downloaded from HCD AFFH Data and Mapping Tool in 2021, based on ACS data.

entitlements are approved.[4] In contrast, based on recent projects, it can take three months to a year for multifamily developers to receive building permits after entitlements.[5] Although the Draft concluded that higher permit processing schedules for multi-family units compared to single family units are not a constraint, the increased complexity and expected timeline does appear to act as a constraint on multi-family development based on the very low production number of multi-family housing in the 5th cycle. .[6]

B. Land Use Controls' Effect on Types of Housing

A complete constraint analysis does not only focus on housing by income levels but must also consider constraints to the different types of housing.. As noted above, the Draft constraint analysis must examine what constraints exist to the development of : supportive housing, transitional housing, single room occupancy units, and emergency shelters. Gov't Code 65583(c)(1)

1. Single Room Occupancy (SRO) Units

The City's constraint analysis regarding SRO's should examine more than the limit on the number of units but also where SRO's are permitted to develop. SRO's are a crucial source of affordable housing for many people and can augment the deed restricted affordable housing available to lower income people. The City should commit not only to removing the limit on the number of units that can be contained in an SRO but also add it as a permitted use in the following zones:

RM-MH, RM-2, and downtown while removing conditional use permit requirements from RM-2, RM-3, NMX, CMX, and RMX.

2. Emergency Shelters

The Draft must consider whether its development standards act as a constraint on the development of emergency shelters. Although the City seems to determine that its requirements do not act as a constraint to the development of shelters it also states it may consider making further amendments to the development code to remove any possible constraints. If further amendments are necessary, especially any needed to comply with Government Code section 65583(a)(4)(A), the City should commit to making those changes immediately. For instance, the City's current requirement for the number of toilets per person in a shelter (Muni Code section

[4] Fresno Multi-Jurisdictional Housing Element July 2023, Appendix 1E: City of Fresno, 1E-4-35
[5] Fresno Multi-Jurisdictional Housing Element July 2023, Appendix 1E: City of Fresno, 1E-4-35
[6] Fresno Multi-Jurisdictional Housing Element July 2023, Appendix 1E: City of Fresno, 1E-4-38

15-2729), if it exceeds the building code requirement is a likely constraint on the development of shelters because of the additional cost it adds to this type of development.

3. Supportive Housing

The Draft is silent as to whether the development oecd complies with Government Code section 65583(c)(3) that allows supportive housing in any zone where multi-unit or mixed use development is permitted. If the City's code does not reflect this requirement that is a constraint on housing for people with disabilities and a program to revise the development code to comply with the statute is required.

4. The HE Under-Analyzes Parking Requirement Effects on Housing Construction

The Draft fails to fully analyze whether its parking requirements act as a constraint on housing development, especially in the downtown and along transit corridors. Parking requirements increase the cost of housing.[7] The Draft states it "determines the required number of parking spaces based on the type and size of the residential unit and has found the required parking spaces to be necessary to accommodate the number of vehicles typically associated with each residence."[8] The analysis ignores principles of induced demand and downstream effects of entrenching car-centric land use. The Draft implicitly acknowledges that parking increases costs and may not be critical as it allows waivers for parking requirements in affordable housing developments and other transit-friendly areas.[9] The ad hoc basis of reduced parking requirements introduces uncertainty which can increase the overall cost and time delays in housing development.

Recently, the City has made clear how much of an impediment parking really is. In negotiations with the state to receive a large grant to support increased housing in downtown Fresno, the City earmarked about $70 million of a possible $250 million grant for two new parking structures in the downtown area. Mayor Jerry Dyer stated [the cost of parking structures] "is always a big challenge for us when we try to bring in developers to build housing… Taking that off the table allows for these projects not only to occur faster, but it allows the developers to be more incentivized to build in our downtown area."[10]

[7] http://database.greentrip.org/
[8] Fresno Multi-Jurisdictional Housing Element July 2023, Appendix 1E: City of Fresno, 1E-4-10
[9] Fresno Multi-Jurisdictional Housing Element July 2023, Appendix 1E: City of Fresno, 1E-4-10
[10] https://www.fresnobee.com/news/local/article275363746.html

Although parking has been identified as a constraint to increased housing development, the City has not put forward a program to identify steps to remove the constraint. The City asserts "[p]parking standards are one area where many communities are seeking to decrease housing costs."[11] Yet, minimum parking requirements are squarely within the control of the jurisdiction and could be reduced if the City so decided. The direct link on parking's costs in relation to housing development in Fresno must be further analyzed, and a reduction in parking requirements is likely required.

C. Risk Analysis and Distribution of Affordable Housing

The Draft's analysis of at-risk housing is incomplete. under-analyzes the risks to publicly assisted affordable housing and its distribution. There are more than 8,500 publicly assisted affordable housing units in the City of Fresno.[12]. The Draft identified 695 units at risk of conversion to uses other than low-income residential within 10 years from the housing element adoption deadline.[13] Although the City of Fresno considered the cost of replacing the at-risk units as required under §65583(a)(8), it failed to examine which pathway would be most appropriate for the City and what constraints, if any, would be associated with the pathway chosen.

The City's lack of tenant protections, such as source of income discrimination outreach and education, rent control, just cause protections may operate as a constraint on the maintenance of housing available to lower income people and facilitate the displacement of lower income renters. The lack of these protections should be analyzed as a constraint on the maintenance of housing under Government Code section 65583(a)(5).

III. The Housing Element Fails to Adequately Analyze and Remove Non-Governmental Constraints to Housing Development

In addition to analyzing governmental constraints, the HE must also analyze the potential and actual nongovernmental constraints upon the maintenance, improvement, or development of housing for all income levels. Gov't Code § 65583(a)(6). To that end, the Draft failed to consider the effect of market forces, availability of financing, environmental concerns, and NIMBY opposition.

[11] Fresno Multi-Jurisdictional Housing Element July 2023, Appendix 1E: City of Fresno, 1E-4-14
[12] Fresno Multi-Jurisdictional Housing Element July 2023, Appendix 1E: City of Fresno, 1E-4-55
[13] Fresno Multi-Jurisdictional Housing Element July 2023, Appendix 1E: City of Fresno, 1E-4-55

A. NIMBY Opposition

The Draft must include an analysis of NIMBY opposition to housing development. As a largely sprawling suburban City, Fresno is prone to local opposition to increased density from existing single-family homeowners that have preconceived ideas of the impacts of increased density on their neighborhoods. Further, the zoning code requires conditional use permits for duplexes and multi-family housing in some areas, making them especially susceptible to opposition and defeat from NIMBY residents.

The chilling effect of NIMBY opposition to housing development is not a foreign concept to jurisdictions in Fresno County. For example, in the adjacent City of Clovis, the Clovis City Council recently voted to shut down a proposed 40-unit development near Old Town Clovis because neighbors expressed concerns about traffic congestion, overflow parking and the "monolithic" height of the planned apartment building.[14] NIMBY opposition to housing development is a widespread phenomenon across California but is especially prevalent in areas that have historically been primarily low-density developments. The Draft's failure to analyze NIMBY opposition as a constraint must be addressed in the City's next Housing Element draft, and the City should include a program to reduce this type of opposition by ensuring that more than single family developments are permitted by-right and reducing the discretionary review of multi-family housing.

B. Environmental Concerns

The Draft did not consider environmental constraints as part of its analysis under 65583(a)(6). Environmental constraints may include limitations to water supply, nearby pollution, or infrastructure development.

The City of Fresno relies heavily on groundwater and surface water. As climate change makes water availability less predictable the City must analyze how an increased population and land use will affect water availability and whether water availability will eventually constrain growth.

Further, separate from water availability, the City must consider the infrastructure requirements of delivering water to a denser population. For example, the City estimates that downtown Fresno, where a large portion of new housing development is projected, currently requires significant water and wastewater infrastructure upgrades. Broke Broche, the City's director of public utilities, estimated that downtown Fresno would require between $160-$180

[14] https://www.fresnobee.com/fresnoland/article255749376.html

million in water and wastewater upgrades to support planned housing development.[15] The Draft should analyze the cost of these needed improvements as a possible constraint on development.

Finally, the Draft failed to consider industrial and polluting industries' effect on future housing development. The City of Fresno has evolved as a car dependent City surrounded by heavy industry and highways. Therefore, future housing development will need to carefully consider placement and mitigation measures to avoid perpetuating environmental inequity.

C. Market Forces and Availability of Financing

The Draft failed to include an explanation of current housing development trends and applications across all income levels. Market forces are relevant to the types of housing that are likely to develop in the future. Once this analysis is done it might make it clear what actions the City must take, such as further financing for programs.. Using the example mentioned above, requiring private investment to implement required infrastructure in downtown Fresno would likely make housing development in the area infeasible. Similarly, lower margins or a lack of developer interest in serving lower income portions of the market may require the City to provide incentives to spur greater housing development in the segment. Without a proper analysis such a conclusion is impossible and falls short of the requirements listed in Government Code § 65583(a)(6).

For example, Fresno had some of the highest rental price increases in the country, with a 28% increase in one-bedroom rent prices between January 2021 and January 2022.[16] The spike in rent prices disproportionately affects low-income individuals who are often on fixed incomes or receive low wages that have not kept up with the rapid rise in rents. Further, existing conditions in many rental units in Fresno have failed to keep up with required maintenance and would fail habitability requirements.[17] The combination of unmaintained housing in Fresno alongside rising rents was not analyzed as a constraint. As a result, the condition of housing stock available to low-income populations must be analyzed and the City must take steps to redress those constraints identified.

[15] https://www.fresnobee.com/news/local/article275363746.html
[16] https://www.fresnobee.com/fresnoland/article258073823.html
[17] https://www.fresnobee.com/fresnoland/article251600613.html

IV. <u>Further Revisions and Analysis are needed to determine if the City's Draft Includes Adequate Sites</u>

A. Regional Housing Need Allocation (RHNA)

The City's calculation of the RHNA it must accommodate must be revised to exclude units that have not been approved during the projection period. State law permits cities to reduce the number of units they must accommodate in their inventory of adequate sites, by income level, by the number of units approved or permitted since the beginning of the planning period:

> Projects that have been approved, permitted, or received a certificate of occupancy since the beginning of the RHNA projected period may be credited toward meeting the RHNA allocation based on the affordability and unit count of the development. For these projects, affordability is based on the actual or projected sale prices, rent levels, or other mechanisms establishing affordability in the planning period of the units within the project. See HCD's Housing Element Sites Inventory Guidebook, p. 5, available at https://www.hcd.ca.gov/community-development/housing-element/housing-element-memos/docs/sites_inventory_memo_final06102020.pdf

The City's Draft Element appears to take credit for units that are still under review and have not yet been approved or permitted. The Draft Element cannot claim credit, meaning reduce the RHNA, with the following projects because project approvals have not been obtained for these units: Villa Baraca Apartments (P-1); DADA Lofts (p-13)(indicates the application is still being reviewed); Lincoln Park Apartments (P-16); Starling Townhomes (P-17); Latitudes at Armstrong (P-18); Helm Tower Office and Lofts (P-19); Elm Avenue Living (P-21); Majestic Palm Apartments (P-22); and, Los Pueblos Apartments (P-23).

The Number of sites needed to accommodate the RHNA should reflect the removal of the above-described projects.

B. Capacity calculation

If a site does not have a required minimum density then the City must analyze the development capacity based on the patterns of typical development patterns in the same zone. The City uses a very narrow time frame to assess the development capacity of projects in the City – 2018-2020, it is unclear why the City has chosen such a narrow time frame but in order to assess if the Draft's capacity calculations truly reflect realistic development patterns the City should use a broader time frame to establish the types of developments and capacity typically achieved.

Also, the Draft should explain why the capacity calculation for the RM-1 zone was rounded down from 85 percent to 80 percent, while the same calculation was rounded up from 77 percent to 80 percent in the RM-3 zone.

The City has chosen not to rely on the minimum density to calculate capacity on some mixed-use zone site (NMX, CMX, RMX) and because there are no maximum densities imposed, the City instead creates a formula that determines what is likely "reasonable density" density that could develop on these sites and then divides that "reasonable density" in half to determine the Capacity for the site. This formula is flawed because it relies on very few submitted projects (that may not be approved) to determine what reasonable density might be during this planning period. It is crucial that the capacity calculation accurately reflects patterns of development especially where the City intends to accommodate a significant portion of the lower income RHNA (72 percent) on mixed-use sites. Two examples are not sufficient to establish a pattern of development.

Although the City relies less on the Downtown sites to accommodate the lower income RHNA, a correct calculation of capacity is still crucial in the DTC, DTG, and DTN zones and the DTN-AH overlay. And again, the City relies on very few projects during a very limited time period (2018-2020) to support its calculation for realistic capacity on downtown sites.

C. Non-vacant Sites

Non-vacant sites must demonstrate through the City's methodology that they are feasible for residential development during the planning period. Government Code section 65583.2(g)(1). The methodology is required to consider certain factors. *Id*. The July Draft Element includes a description of the current use of the sites but the analysis must be revised to apply the required factors[18] in order to assess the availability and feasibility of these sites for residential development during the planning period beginning in December 2023, including the City's past experience converting existing uses to higher density residential development.

[18] The methodology shall consider factors including the extent to which existing uses may constitute an impediment to additional residential development, the city's or county's past experience with converting existing uses to higher density residential development, the current market demand for the existing use, an analysis of any existing leases or other contracts that would perpetuate the existing use or prevent redevelopment of the site for additional residential development, development trends, market conditions, and regulatory or other incentives or standards to encourage additional residential development on these sites. Gov. Code section 65583.2(g)(1).

D. Large Sites and Concentrated Sites

The July Draft requires revisions to provide examples of whether "sites of equivalent size were successfully developed during the prior planning period for an equivalent number of lower income housing units as projected for the site…" Gov. Code section 65583.2(c)(2)(B). The Draft must also be revised to specifically identify what portions of the large parcels will accommodate the lower income housing needs in the City. The City is correct to assume that 100 percent of large sites, a site that is over 10 acres, will not likely develop for affordable housing. This is due, in part, to the limitation of available funding mechanisms for projects of over 200 units. But, identifying so many large parcels to accommodate housing for the lower income RHNA in close proximity to each other also acts as a constraint on development as affordable housing due to the same funding limitations. To be clear, identifying a large percentage of the sites to accommodate the lower income RHNA in close proximity to each other is a constraint on obtaining funding for affordable housing, funding which is critical to developing affordable housing, and it will create an obstacle to the development of these sites as affordable housing.

In addition, many of these sites are also concentrated in one area of the City and that also prevents the City from meeting its duties to remove patterns of segregation and comply with its duty to affirmatively further fair housing. [As mentioned in the AFFH section above, the over concentration of sites intended to accommodate the lower income housing need in specific areas of the City is inconsistent with the City's duty to Affirmatively Further Fair Housing.]

As noted above the City's inventory of available sites will need revisions and further analysis in order to determine whether the City has identified adequate sites to accommodate its RHNA for this planning period.

V. The Assessment of Fair Housing Fails to Comply with Section 65583(c)(10)

For generations, local mayors and council members have described Fresno as a "tail of two cities", an illusion to Charles Dickens' tragic 1859 novel of pre-revolution France, in acknowledgement of the outstanding disparities in quality of life and access to opportunity that exists between neighborhoods in the Northern and Southern portions of the City and the striking racial and economic differences that underlie them. Studies and data have repeatedly confirmed not only that South Fresno neighborhoods and people of color in Fresno are impacted by a severe lack of access to housing choice and access to opportunity across many indicators compared to North Fresno neighborhoods and White residents, but that the disparities impacting South Fresno, people of color and other protected classes stand out as among the most significant in the state and the country. The City's duty to AFFH through the Housing Element and to complete an

Assessment of Fair Housing in order to do so presents the City with a crucial new opportunity to address the intergenerational disparities and barriers to opportunity that persist in Fresno. Unfortunately, as discussed further below, the AFH lacks information and analysis and fails to incorporate public input as necessary to address the requirements set forth in Section 65583(c)(10) and does not achieve the requirement to ensure that the City AFFHs through its housing element.

A. Integration and Segregation and R/ECAP and Concentrated Area of Affluence Analyses Lack Required Detail

The AFH's analyses of patterns of integration and segregation and R/ECAPs and Racially Concentrated Areas of Affluence ("RCAAs") fail to address important factors which must be considered as part of a complete analysis pursuant to section 65583(c)(10)(A)(ii) and HCD's AFFH Guidelines. *See* AFFH Guidelines, pp. 30-34. These gaps render the AFH analysis incomplete and include but are not limited to the following:

- Failure to provide any data or analyze integration and segregation patterns for racial groups other than Hispanic/Latinos. Table 1:E-3.1, "Population by Race and Hisppanic Origin, Fresno, 2000-2020," provides data about the share of the population of different racial groups in Fresno in 2000, 2010, and 2020, but no data is included that addresses the spatial composition and segregation or integration status of Black, AAPI, Native American, and other racial and ethnic groups. Similarly, the analysis fails to identify groups experiencing the highest levels of segregation as required. AFFH Guidelines, p. 31.
- Failure to accurately or thoroughly analyze distribution of low- and high-income households across Fresno. The Figure 1E-3.4, Median Household Income, Fresno, 2019 indicates median income levels across the City and depicts median incomes of $100,000 or over in some areas West of State Route 99, Northwest Fresno, Northeast Fresno, and in the Sunnyside neighborhood of South Fresno. Yet the AFH's analysis of the data depicted by the map fails to acknowledge these high-income neighborhoods throughout the City, stating only that "Northwest neighborhoods of the city…have the highest median incomes. Otherwise, most of the remaining census block groups in the city have household incomes that fall below the statewide median indicating high poverty levels." This analysis washes out important information about relative income levels across Fresno, including concentrations of high-income households and low-income households in specific neighborhoods, which should be used to inform and geographically-target programs and the location of sites included in the inventory to AFFH. *See* HCD

Guidelines, p. 32. For neighborhoods like West Fresno, which experience particularly acute barriers to opportunity linked to policies and practices that created and enforced segregation, an accurate and complete analysis and programs that respond to that analysis are essential.

- The AFH's analysis of R/ECAPs and RCAAs fails to address "public participation, past policies, practices, [and] investments" as required. HCD Guidance, p. 33. The R/ECAP analysis provides only the generic statement that "R/ECAPs generally have less private investment from financial institutions, grocery stores, and other retail outlets," but does not provide any analysis specific to Fresno City or regional policies, practices, and investments that contributed to the creation and/or perpetuation of R/ECAPs. The RCAA analysis only identifies that 18 RCAAs exist in Fresno, with no analysis at all of the factors giving rise to those RCAAs or their persistence or variation over time nor does it consider any public input on this topic.

As a result of these and other deficiencies, the AFH's analysis of integration and segregation and R/ECAPs and RCAAs is incomplete. The analysis and the Draft Element's contributing factors, goals and actions must be revised accordingly.

B. Incomplete Analysis of Disproportionate Housing Needs Based on Race, Ethnicity, Familial Status, Disability, and Income

The analysis of disproportionate housing needs must analyze needs relating to cost burden, overcrowding, substandard housing, homelessness and other factors for protected characteristics, including at least race and ethnicity, familial status, persons with disabilities, and income. § 65583(c)(10)(A)(ii); AFFH Guidance, p. 39. Disproportionate housing needs "generally refers to a condition in which there are significant disparities in the proportion of members of a protected class experiencing a category of housing need" compared to the proportion of members of other relevant groups or the total population HCD's guidance emphasizes that local data and knowledge are particularly important to this analysis. *Id.* The requirement to analyze disproportionate housing needs is fundamental to achieving the purpose of the AFH to ensure that the housing element affirmatively further fair housing by identifying disparities impacting protected classes which have been subject to historic discrimination, describes the factors contributing to those disparities, and adopts meaningful actions that overcome patterns of segregation and address disparities in housing needs and opportunity for protected classes. Yet, the AFH fails to satisfy this requirement. While it provides the percentage of households experiencing any one of four specified housing problems - lack of complete kitchen facilities, lack of complete plumbing facilities, overcrowding, cost burden – by race and ethnicity, the analysis of overcrowding, cost burden, and substandard conditions only addresses

the prevalence of those housing issues based on housing tenure (renter or owner) and census tract. The analysis fails to include any information about the separate occurrence of overcrowding, cost burden, and substandard housing conditions based on race or ethnicity and fails to provide any information at all about how these factors disproportionately impact Fresno residents based on familial status and disability. While the AFH includes some data relating to the race, gender, and mental disability of unhoused residents, it fails to include information relating to familial status. Further, the analysis includes no information that reflects "local knowledge" or public input, depriving the analysis of details about specific housing needs within the categories identified above and the scale of those needs in relation to others.

The City must supplement its disproportionate needs analysis to include the required demographic information and revise the AFH further to ensure its contributing factors and meaningful actions reflect that information.

C. Displacement Risk Analysis Fails to Consider Relevant Housing Cost, Tenant Protection, Land Use, and Environmental Risks

The AFH evaluation of displacement risk consists of the identification of census tracts which qualify as "sensitive communities" that may be vulnerable to displacement as a result of rising housing costs and market-based displacement pressures based on demographic, tenure, rent burden, and rent change criteria developed by The Urban Displacement Project of UC Berkeley and the University of Toronto. Figure 1E-3.31, Communities Sensitive to Displacement in Fresno, provides useful information indicating that large swaths of the City, including most South Fresno and Central Fresno neighborhoods, as well as the Blackstone Avenue Corridor are vulnerable to displacement, the AFH's displacement risk analysis falls short by failing to consider other relevant information relating to existing and potential housing cost pressures confronting low-income residents, residents of color, and other protected classes, as well as significant displacement risks associated with tenant protection limitations, City land use policies and practices, environmental hazards, and climate change. A complete displacement risk analysis must consider these and other relevant factors. *See* AFFH Guidance, pp. 40-43.

1. Displacements Risks Associated with Housing Cost Pressures

As mentioned above, the AFH's identification of sensitive communities using The Urban Displacement Project's criteria provides a helpful high-level view of the displacement pressures impacting most of the City of Fresno, and almost all South Fresno and Central Fresno neighborhoods. That mapping alone however is not sufficient to accurately describe displacement risks impacting residents associated with housing cost pressures.

First, the criteria used in the analysis rely on data from 2017 and earlier, including data relating to the change in rent between 2012 and 2017. This time period does not capture the sharp and sustained escalation in housing costs (both rental and ownership) that occurred during the COVID-19 pandemic between 2019 and 2022.[19] Between 2017 and 2021, Fresno experienced the greatest rent increases of all large U.S. cities, with rental prices increasing nearly 39% during that time.[20] Pandemic-era and ongoing housing price increases disproportionately impact the housing stability of renters, people of color, and other populations that have less disposable income and assets on average and are impacted by discrimina and sustained nature of the housing cost increases which have occurred in Fresno since 2017, the AFH's displacement risk analysis must be supplemented with and revised based on more recent data.

Second, while the AFH's displacement risk section provides a snapshot of neighborhoods vulnerable to increased housing costs that occurred between 2012 and 2017, the section does not actually discuss housing cost trends over time or analyze the factors driving increased housing costs across the City and certain neighborhoods. The use of census tract level data alone to determine whether an area qualifies as a "sensitive community" or not, without further discussion, also washes out unique vulnerabilities experienced by particular neighborhoods which comprise only a portion of a census tract. The City must supplement the displacement risk section to include this additional information and analysis, using available data and local knowledge, in order to meaningfully identify displacement risks associated with housing cost pressures and on particular neighborhoods and protected classes.

Several factors are likely or definitely associated with rising housing costs in Fresno which the AFH does not but must identify and evaluate for their impact on displacement risk. These include but are not limited to the following:

- The expiration of affordability covenants attached to Low-Income Housing Tax Credit financed properties during the Planning Period. According to the Draft Housing Element's At Risk Analysis, three properties consisting of 115 affordable units in the next four to eight years. The expiration of the affordability covenants on these properties creates a direct displacement risk to residents who are unable to pay market-rate rents.

[19] CalMatters, Real estate prices soar during the pandemic, climbing 25% in parts of California, Dec. 5, 2020, available at https://calmatters.org/california-divide/2020/12/real-estate-climb-pandemic/
[20] Los Angeles Times, The Nation's Hottest Housing Market? Surprise – it's Fresno, Mar. 31, 2021, available at https://www.latimes.com/homeless-housing/story/2021-03-31/fresno-rent-spike-taps-into-california-covid-housing-trends

- Major federal, state, and local investments in public works infrastructure projects in South Fresno neighborhoods, including a $250 million phased budget commitment for downtown revitalization in the 2023/2024 California State Budget[21]; the June 2023 Federal Railroad Administration and State High Speed Rail Authority $20 million award for the Fresno High-Speed Rail Station Historic Depot Renovation and Plaza Activation Project; and an $80 million July 2023 award from the State's Transit and Intercity Rail Program[22] for grade separation and intersection improvements in Central Fresno at McKinley Avenue and Blackstone Avenue. None of these historic awards have requirements attached to them to reduce the risk of displacement as a result of rising rents associated with neighborhood improvements.
- The development of the California High Speed Rail project, with a depot in Fresno, which the draft Housing Element recognizes is expected to increase housing demand in Fresno by enabling commuting between Fresno, Coastal California, and/or Sacramento. Draft Housing Element, p. 3-79. The analysis should also consider the impact of speculation associated with HSR on housing availability, prices, and displacement risk.
- The conversion of housing units to short-term rentals and their impact on housing cost pressures and displacement risk. The Draft Housing Element indicates that 7% of vacant units in the city are seasonal, short-term rentals, or "other" housing accommodations, but does not state what percentage of total units are seasonal housing or short-term rentals. The Draft states that stakeholders with Llaves De Tu Casa (an initiative involving real estate professionals, banks, the City of Fresno, and affordable housing developers) expressed concern about investors displacing community members to establish short-term rentals. Draft Housing Element, p. 1E-6-15. According to a recent news story, 811 homes were available as short-term rentals in Fresno and Clovis in June 2023, which represents a 27% increase in available rentals since 2020 and almost twice the number of homes listed for sale at that time.[23]

[21] YourCentralValley, City of Fresno announced $250 million for downtown, June 28, 2023, available at https://www.yourcentralvalley.com/news/local-news/city-of-fresno-announces-250-million-for-downtown/
[22] See Fresno Bee, State will help Fresno rebuild a major railroad crossing. Where is it, and what will it cost?, Jul. 6, 2023, available at https://www.fresnobee.com/news/local/article277074553.html
[23] GVWire, Is an Airbnb Crisis Looming in Fresno as Demand Plummets?, June 29, 2023, available at https://gvwire.com/2023/06/29/is-an-airbnb-crisis-looming-in-fresno-as-demand-plummets/

The AFH's discussion of City "Displacement Avoidance Efforts" does not remedy the need for a complete analysis addressing the displacement risk factors above, including relevant City policies and practices, and the adoption of meaningful actions to address those risks. That section describes certain planning efforts the City undertook to evaluate displacement risks from rising housing prices and consider, but it does not actually provide any information about the findings of that policy recommendations and the policies that the City did or did not adopt. Given the significant stakeholder engagement conducted for the development of the "Here to Stay Report," the AFH should incorporate and consider relevant information and policy recommendations contained in that report.

2. *Tenant Protection, Land Use, Environmental, and Climate-Related Displacement Risks Not Considered in the AFH Displacement Risk Analysis*

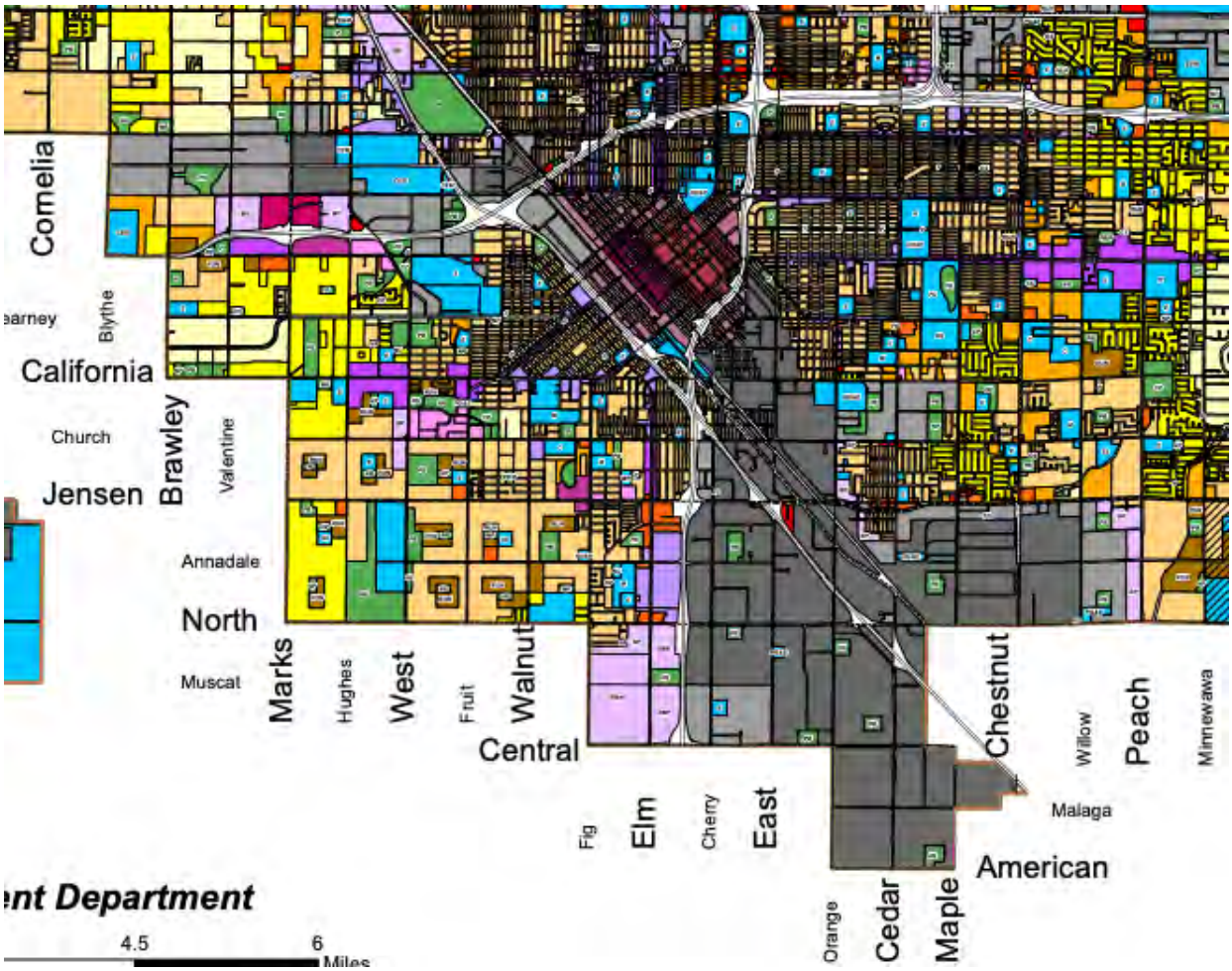
A complete analysis of displacement risks considers not only displacement risks associated with housing cost pressures, but also other factors which result in housing instability, including factors relating to the adequacy of tenant protections, disinvestment, local land use policies and practices, environmental hazards, and risks associated with natural disasters and climate change. The Draft Housing Element considers none of these risk categories, yet based on our direct work with tenants and low-income residents and residents of color, they represent real and significant risk factors for Fresno residents.

First, the Displacement Risk section does not address the adequacy of policies and resources to protect tenants from displacement as a result of eviction, harassment, and substandard housing. A coalition of residents and community-based organizations have called to the City's attention the need for and have repeatedly asked the City to adopt additional and stronger policies and programs to protect tenants, including in particular more comprehensive and stringent rent control standards than those established by the state, just cause requirements for eviction, and right to return home for displaced residents. And while the AFH mentions the City's code enforcement programs, it does not analyze how successful these programs have been in preventing tenant displacement and ensuring residents have a habitable space in which to live. Draft Housing Element, p. 3-79.

Second, while the Draft Housing Element recognizes the occurrence of historic disinvestment and describes recent initiatives to increase investment in South Fresno neighborhoods, the AFH does not but should consider the extent to which public and private disinvestment and unequal investment continues to impact low-income neighborhoods, neighborhoods of color, and neighborhoods with a high proportion of tenants and how

disinvestment perpetuates and/or increases displacement risk in these areas. *See* AFFH Guidance, p. 40. Yet even today, many South Fresno neighborhoods lack sidewalks, streetlights, park space, grocery stores and other public and private investments that contribute to neighborhood and housing-stability.

Third, the Draft Housing Element fails to consider the displacement risks associated with the City's land use and permitting decisions which have directed and continue to allow for and promote the concentration of industrial and waste management facilities in and around neighborhoods in Jane Addams, Southwest Fresno, South Central Fresno (referred to by the Draft Housing Element as the "South Industrial Area"), and Southeast Fresno. The City's General Plan land use map designates thousands of acres of land in these neighborhoods for industrial and business park uses, which encompass warehouse distribution facilities, agricultural processing operations (e.g., slaughterhouses, meat rendering facilities), chemical storage, landfills, waste transfer stations, biomass facilities, and more. Draft Housing Element, p. 1E-3-77. These designations are applied to land adjacent to land designated for and/or developed with residential neighborhoods as well land currently developed with housing. Several General Plan policies direct the City to expedite development on sites designated for industrial land uses by streamlining permitting and making sites "shovel ready" for new development through the installation of infrastructure and connection to services. City of Fresno General Plan, ED-1-d, ED-1-e, ED-1-j. ***The General Plan therefore envisions and plans for the conversion of existing housing and neighborhoods to industry*** and the continued proliferation of industrial land uses surrounding housing and other sensitive uses, both within existing City limits and within the City's Sphere of Influence.



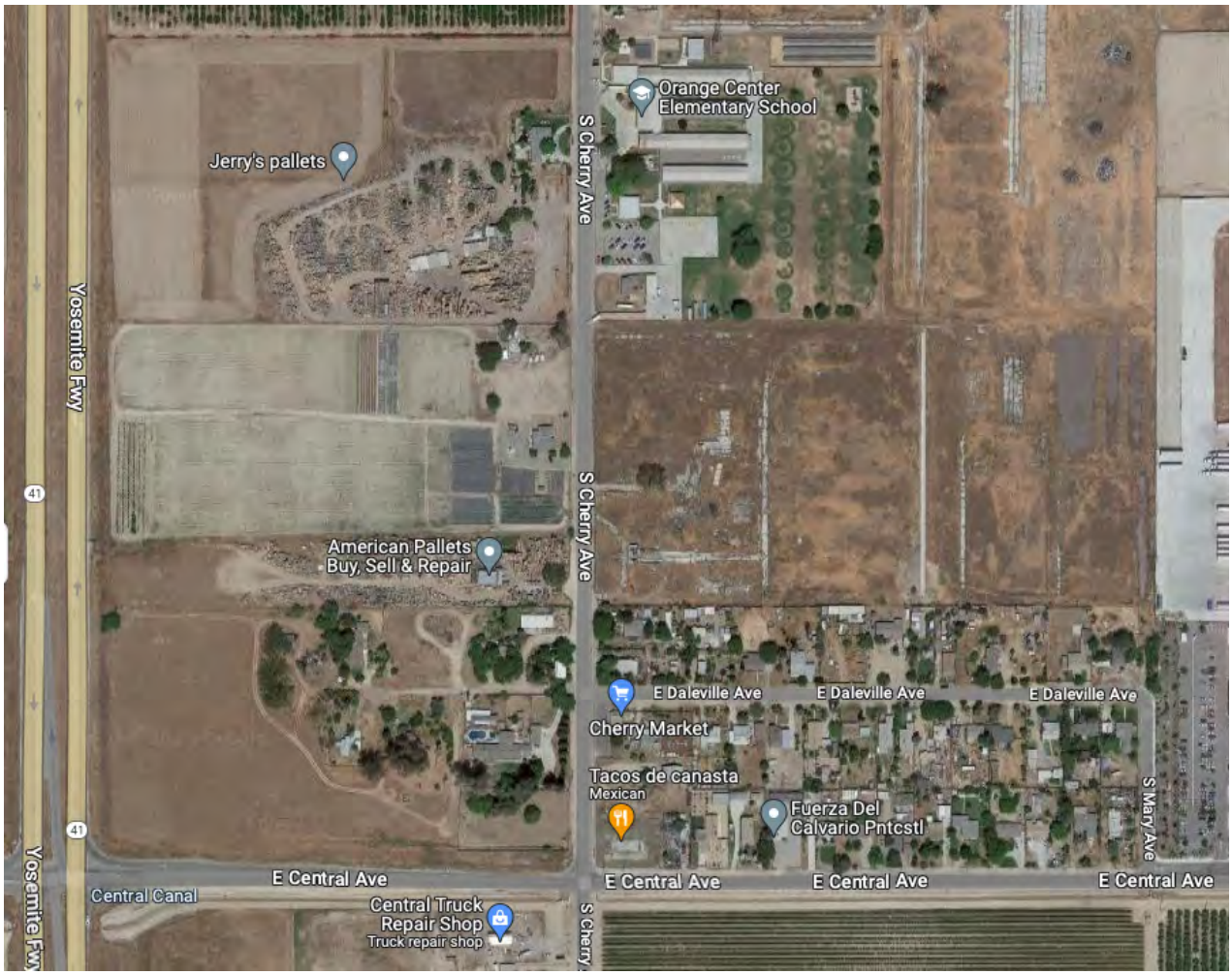
City of Fresno Official General Plan Land Use and Circulation Map (Excerpt)[24]

[24]Portion of City of Fresno Official General Plan Land Use and Circulation Map, available at https://www.fresno.gov/wp-content/uploads/2023/03/Official-General-Plan-Land-Use_20220411-1.pdf



Google Earth Image Depicting S Rose Ave. & E. Kaviland Ave Neighborhood, Zoned Industrial on General Plan Land Use Map, and Adjacent West Fresno

(captured 08/16/2023)



Google Earth Image of Unincorporated Daleville Neighborhood, Zoned Industrial on the General Plan Land Use Map, & Orange Center Elementary School



San Joaquin Estates Mobile Home Park ("MHP"), Villa Fresno MHP, and Fresno MHP, Adjacent to and/or Surrounded by Industrial Zoning on the General Plan Land Use Map

(captured 08/16/2023)

These new warehouse facilities, in combination with existing industrial facilities clustered in South Fresno neighborhoods, have severe negative and destabilizing impacts on nearby housing. Warehouse distribution facilities, such as the Amazon and Ulta Beauty warehouses in South Central Fresno, attract thousands of truck trips that travel on roads shared with homes, schools, and parks every day. This truck traffic creates toxic diesel air emissions, dust, vibration, noise, and light glare which negatively impacts residents in their homes, including their health and well-being, the longevity and potential future occupancy of their housing. The construction and operation of facilities themselves often creates excessive dust, noise, light glare, heat, odors, and other effects which have similar impacts on residents and housing quality and stability. We have attached to this comment letter a declaration from a South Central Fresno resident describing impacts she has experienced due to the proliferation of

industrial facilities in her neighborhood. Attachment A, Declaration of Katie Taylor.[25] The City must revise the AFH's Displacement Risk analysis to include a full evaluation of the impacts of its policies and practices relating to industrial development on displacement risks, including based on protected class status and income and reflecting the local knowledge of residents impacted by this issue, and incorporate meaningful actions to address those risks.

Fourth, the AFH's Displacement Risk section does not and should be revised to consider displacement risks associated with environmental hazards, environmental disasters, and climate change, pursuant to HCD's AFFH Guidance. AFFH Guidance, p. 42. For instance, South Fresno neighborhoods have been impacted by a series of fires at warehouse, recycling, and other industrial facilities that have occurred during the increasing number of high and extreme-heat days over the past five years.[26] Potentially toxic smoke from these fires has at times densely concentrated in South Fresno neighborhoods, which can make breathing difficult and unsafe for residents even within their homes with windows closed. In addition, residents who live in neighborhoods with incomplete sidewalks, stormwater drainage and other infrastructure and in housing without adequate cooling are at greater risk of displacement than other residents from climate-related weather events, including extreme heat and flooding. In Fresno, which recorded temperatures of 100 degrees Fahrenheit or higher on 23 days and a high temperature of 109 degrees in July 2023, extreme heat poses a serious threat of displacement for residents who lack adequate cooling in and/or cannot afford the cost of cooling their homes.

The City must revise the AFH to include a complete and accurate Displacement Risk analysis as described above and modify other sections of the Housing Element, including the AFHs contributing factors and meaningful actions to overcome disparities relating to access to a healthy environment associated with these land use patterns.

VI. The AFH Fails to Consider Significant Disparities in Access to Opportunity to Multi-Modal Transportation Options, a Healthy Environment, and Quality Education

[25] While the resident, Ms. Katie Taylor lives immediately outside of City of Fresno city limits, she resides within the City's Sphere of Influence and her experiences of the impacts of industrial development mirror those of many South Fresno residents who reside within the City of Fresno.

[26] See for example, ABC30, Crews Battling Large Fire at Southwest Fresno Recycling Center, June 18, 2021, available at https://abc30.com/fresno-fire-recycling-center-recylcing-timely/10807838/; KSEE24, Massive fire burns industrial building in Fresno. What made the battle difficult for firefighters, June 26, 2021, available at https://www.yourcentralvalley.com/news/local-news/massive-fire-breaks-out-at-warehouse-near-downtown-fresno/; ABC30, Flames break out at warehouse in Southeast Fresno with homes and businesses nearby," Apr. 3, 2023, available at https://abc30.com/warehouse-fire-southeast-fresno-east-and-florence-homeless-activity/13077246/

The AFH must include an analysis of disparities in access to opportunity. § 65583(c)(10)(A)(ii). Access to opportunity broadly encompasses the place-based characteristics which are linked to critical life outcomes, including "education, employment, economic development, safe and decent housing, low rates of violent crime, transportation, recreation, food, and a healthy environment (air, water, safety from environmental hazards, social services, and cultural institutions). AFFH Guidance, p. 34. The AFH fails to consider disparities relating to several key components of access to opportunity, including in particular disparities in access to multi-modal transportation opportunities, a healthy environment, and neighborhood investments – issues which residents and CBOs have long raised with the City.

A. Disparities in Access to Multi-Modal Transportation Opportunities

An analysis of access to transportation opportunities must, at minimum, compare concentrations of protected groups with access to transportation options; assess any disproportionate transportation needs for members of protected classes; and analyze combined housing and transportation cost impacts on protected groups. *Id.* at p. 35. Transportation options include personal vehicles and public transportation, as well as options for pedestrians and bicyclists and other forms of group or shared transportation. *See Id.* at 48, 69, 73.

The AFH's Transit Mobility analysis, as indicated by its title, focuses exclusively on the availability of public transit, including the FAX bus system and Handy Ride, through a brief discussion of available routes and programs and policies in place to reduce fares for certain populations. This analysis fails to compare access to transportation opportunities based on protected characteristics; assess any disproportionate transportation needs for members of protected classes; provide important information about the adequacy of public transportation service in different areas of the City, protected classes, and low-income households; and entirely fails to consider access to other forms of transportation, including walking and bicycling.

The City must revise the Draft Housing Element to include and analyze this missing information. In addition to the categories identified in the paragraph above, specific issues which must be considered include but are not limited to:

- Barriers to access to public transportation based on route limitations, especially for neighborhoods located on the fringes of the City. This includes both disadvantaged neighborhoods which are more strongly reliant on public transportation, such as Jane Addams and areas of West Fresno and South Central Fresno, and high resource neighborhoods in Northeast and Northwest Fresno, which Figure 1E-3.18, Fresno Area Express (FAX) indicates have significant less route access than South Fresno. The housing element must consider how route

limitations in these areas impact mobility of residents of disadvantaged communities and their access to various forms of opportunity as well mobility and housing opportunities for low-income residents in North Fresno, considering affordable housing subsidy scoring criteria which often prioritizes public transit accessibility.

- Barriers to mobility resulting from lengthy travel times for residents' using public transportation due to bus wait times, lack of direct routes, and route limitations requiring residents to use other forms of transportation to reach their first and last stop, especially for residents in fringe neighborhoods.
- Inadequate and/or absent infrastructure to facilitate safe and efficient active transportation, including but not limited to sidewalks, curbs, stormwater drainage, streetlights, crosswalks, and protected bike lanes.
- Inadequate and/or absent protection from extreme weather, including climate-related weather events, such as extreme heat and flooding, that impact walking, biking, and public transportation use. This includes but is not limited to the availability of shade (e.g., trees, structures), shelter, sidewalks, and stormwater drainage.
- The presence of high volumes of traffic, including heavy-duty truck traffic, on roadways used by pedestrians or bicyclists, including in and near areas zoned for industrial land uses and along designated truck routes.

B. Disparities in Access to a Healthy Environment

An analysis of access to a healthy environment must describe any disparities in access to environmentally healthy neighborhoods by protected groups, consider available statewide data such as CalEnviroScreen, evaluate consistency with the environmental justice element (if relevant), and discuss policies, practices, and investments that impact access to environmentally healthy neighborhoods. AFFH Guidance, p. 35. A complete analysis should consider any impacts on access to a healthy environment associated with the zoning, siting and operation of polluting or toxic land uses in disadvantaged communities and with climate change. *Id.* at pp. 16, 73. A robust analysis of disparities in access to a healthy environment, informed by public input, is especially important in Fresno given the high concentration of communities in low-income South Fresno neighborhoods of color that rank among the most burdened by multiple sources of pollution in the state and the relatively low-pollution burdens on many indicators born by comparatively affluent and Whiter North Fresno neighborhoods and RCAAs.

The AFH's Healthy Environment analysis includes data demonstrating cumulative pollution burdens impacting Fresno neighborhoods by census tract and provides some

information about industrial and waste processing facilities in South Fresno. However, it fails to include *any* discussion of City policies and practices underlying the stark environmental health disparities between South Fresno and North Fresno neighborhoods reflected in the data or any information or analysis about what policies, practices, and investment underlie those disparities. The analysis points to agricultural industry practices as a basis for high pollution indicator scores in Western Fresno County but does not discuss the bases for pollution disparities impacting the City of Fresno itself, including West Fresno, Jane Addams, South East Fresno neighborhoods with high cumulative pollution scores.

As discussed above, City policies and practices have intentionally concentrated polluting and noxious industrial and waste management land uses in South Fresno neighborhoods and policies and practices remain in place that all promote the exacerbation of these patterns to the detriment of housing opportunities and quality of life for South Fresno residents. These policies and practices include but are not limited to impact fees for a community benefit fund, public health impact reports, and cargo/freight prohibition and revenue tax.

C. Disparities in Access to Educational Opportunity

The AFH's analysis of educational opportunities must include an evaluation of the presence or lack of policies, practices, and investment to promote proficient schools or that contribute to a disparity in access to opportunity," among other factors. HCD's AFFH Guidance, p. 35. Disparities in access to transportation opportunities and environmental health, including those discussed above, significantly impact access to educational opportunity. For instance, a lack of or incomplete sidewalks, stormwater drainage, and streetlights in R/ECAPs; inefficient public transportation options; and the use of local roads by heavy-duty truck traffic may prevent students from traveling to and from school safely and on time, which may in turn have a series of impacts on students' access to educational opportunity. Likewise, the presence of heavy industrial facilities near and surrounding schools and ongoing construction for the development of new warehouse distribution centers may disrupt learning by exposing students to air, noise and light pollution and increasing temperatures and thereby also undermining opportunities for outdoor recreation during school hours. The City should also consider how policies, practices, and investments or disinvestments relating to access to green space, tree canopy, and climate resiliency (including adequate cooling and wildfire smoke protection) impact educational opportunities at schools, especially in low-income neighborhoods. The City must revise its analysis of educational opportunities to address these and other issues not addressed in the Draft Element and revise and add to its actions accordingly.

VII. Incomplete Analysis of Housing Element Sites' Compliance with AFFH Duty

Housing Element Law requires that jurisdictions' sites inventory "identify sites throughout the community" consistent with its duty to AFFH. § 65583.2; 8899.50; HCD AFFH Guidance, p. 45. The AFH must evaluate sites "relative to the full scope of the assessment of fair housing" and provide detailed instructions describing the required components of this evaluation. AFFH Guidance, p. 45.

Here, the AFH fails to evaluate important components of whether the distribution of sites in the inventory AFFH and to summarize conclusions and identify specific programs to address fair housing issues associated with the locations of those sites. Deficiencies of the evaluation include but are not limited to the following:

- The AFH's analysis of the sites inventory's impact on segregation and integration trends, like other sections of the AFH, only briefly considers impacts on the distribution of Hispanic/Latino households and does not consider at all the impact on relative integration and segregation of other races. Critically, it fails to acknowledge how the lack of lower-income sites identified in high-resource areas, including for example Northeast Fresno, will perpetuate patterns of RCAAs and R/ECAPs. *See* AFFH Guidance, p. 45.
- The AFH lacks analysis of the impact of its sites locations on access to specific forms of access to opportunity and therefore fails to identify any programs to address fair housing barriers to which its site selection gives rise. The sites inventory includes a large share of sites in low-income neighborhoods of color impacted by poor environmental health indicators, industrial zoning and concentrations of industrial and waste management facilities. The inventory also includes sites located near State Routes 99, 41, and 180 as well as many sites on Blackstone Avenue, a heavily trafficked thoroughfare. The City must analyze these and other impacts on access to a healthy environment implicated in its choice of sites. In addition, the AFH lacks analysis of how absent or incomplete infrastructure, services, and amenities impact access to opportunity on sites included in the inventory and fails to identify programs to address these barriers. The Draft Element includes a significant share of sites in areas West of State Route 99 which are not yet developed and which lack basic infrastructure, services, and amenities, such as sidewalks, streetlights, public transportation, park space, and grocery stores as well as City water and sewer connections. Many of the lower-income sites identified in low-income South Fresno neighborhoods also experience disparities in access to critical infrastructure and services which must be considered in an analysis.
- Only 23% of sites included in the inventory to meet the lower-income RHNA are in high and highest resource areas, which the AFH states is due to the predominance of single-family zoning north of Shaw Avenue. 1E-3-109. "Where the analysis of the

inventory indicates that the community has insufficient sites appropriately zoned and located to accommodate its lower-income RHNA in a manner that affirmatively further fair housing, the housing element must include a program to address this inconsistency, such as making additional sites available to accommodate its lower-income RHNA in a manner that affirmatively further fair housing." AFFH Guidance, p. 45. Despite its recognition of the limited number of lower-income inventory sites in high resource areas, the AFH fails to describe a program included in the Draft Element to adequately address this fair housing issue. As further discussed in this letter below, while the AFH points to Program 2 as the Draft Element's action to address this fair housing issue, the program fails to ensure that it will actually add sites to the inventory to meet the lower-income RHNA in high-resource areas or that it will facilitate development of lower-income housing in high-resource areas at all. The program commits only to "present potential sites or rezoning options for land in high resource areas for Council consideration for higher density development." p. 1E-18. While the time frame section indicates that City will rezone sites in high resource areas by 2027, the language in the body of the program does not make commit the City to actually rezoning sites or to include additional sites located in high-resource areas to the housing element and therefore renders the commitment that the Program is making ambiguous. The Program also makes no commitment to ensure that sites that may or may not be rezoned or impacted by this Program are "suitable" for development pursuant to the Housing Element Law's standards, including that increased capacity is created on vacant and/or underutilized sites. Further, the City provides no analysis justifying its selection of 750 units of additional capacity as its target or if that quantity is sufficient; if changes to permitting and zoning standards of sites located in the Office District will create sites near amenities and resources and with relatively low environmental burdens within high-resource census tracts; why rezoning of sites within low-density, higher income neighborhoods which are still under development is not proposed and that impact of the failure to include such sites on addressing patterns of segregation and exclusion. The Program also fails to address barriers to housing opportunity for lower-income residents who reside in housing developed in high resource areas, including inadequate public transportation options, affordable fresh food, and cultural and linguistic resources.

- The AFH sites inventory analysis includes no discussion of local knowledge and community input, pending development, development potential and other relevant factors which must be discussed in a complete analysis. AFFH Guidance, p. 45-46.

The City must address these deficiencies in the AFH's sites inventory analysis and include additional meaningful actions, with deadlines and clear outcomes, to overcome the fair housing issues associated with the Draft Element's inventory.

VIII. Failure to Fully Analyze Contributing Factors and Lack of Meaningful Actions to Affirmatively Further Fair Housing Render the Draft Housing Element Noncompliant.

The City has failed to complete an adequate analysis of factors that have contributed to patterns of segregation and as discussed above the program actions included in the draft housing element do not and will not effectively AFFH as required by law. Unless and until the City fully analyzes factors that have contributed to patterns of segregation, identifies which factors it will address along with the programs and policies it will rely on to do so and metrics that demonstrate success, the housing Element will be out of compliance with state mandates. (See Government Code section 65583(c)(10))

IX. Failure to Adopt Community Identified Programs That Will Result in A Beneficial Impact During the Planning Period and AFFH

Housing Element Law requires that housing elements include programs with a schedule of actions with timelines and specific commitments that will have a "beneficial impact" within the planning period to achieve the housing element's goals and objectives. As stated in the AFFH guidance "actions implement goals and consist of *concrete steps, timelines, and measurable outcomes.*" Pursuant to the requirement that housing elements AFFH, housing elements must also include actions to implement priorities and goals identified in an Assessment of Fair Housing (AFH). Those actions must be "meaningful" and go beyond combatting discrimination to "overcome patterns of segregation and foster inclusive, affordable and stable communities." AFFH Guidance, p. 46; *See* Government Code §§ 65583(c)(5)&(10, 8899.50(a)&(b).

The draft element's Housing Action Plan contains numerous actions that lack concrete steps and measurable outcomes and will not necessarily result in a beneficial impact during the planning period in violation of the Housing Element Law's standards. Certain programs fail to identify concrete steps, specific actions the city will take to complete each program, use of vague language, and do not provide adequate timelines. Finally, the action plan fails to include community identified programs and solutions collected from public hearings and workshops. Examples of inadequate programs, and some of our recommendations to improve them, include the following:

- **Program 1 - Maintain Adequate Sites.** Program 1 states that the City shall continue to maintain a current inventory of Housing Element sites to ensure that it can adequately accommodate the 2023-2031 RHNA" Given the impact of rezoning to the availability of and location of sites suitable for housing, the City should take additional steps to ensure transparency in decision-making related to proposed rezones and take diligent steps to provide notice of the proposed rezone along with an assessment of the potential impacts of the rezone on housing opportunity prior to a decision on the proposal. This includes but is not limited to public hearings and door to door canvassing to facilitate effective notice. Further, the city must conduct a racial equity analysis which would include the benefits and disadvantages of the proposed rezone and whether it would result in displacement of protected racial/ethnic groups, reduce housing opportunities for protected groups, and how it would impact patterns of segregation. Finally, the program should explicitly prohibit the rezoning of sites suitable for lower income households to industrial land use classifications which would bring industrial uses next to or near neighborhoods that include or are planned for housing affordable to lower income residents. This is critical to ensure that the City is compliant with its duty to affirmatively further fair housing.

- **Program 2- Variety of Housing Opportunities in High Resource Areas *(identified in the AFH as a Meaningful Action).***
  The program states that the City "will identify and pursue opportunities" with affordable housing developers to promote the development of affordable units in high resource areas. Unfortunately, it does not provide any details on how they will in fact promote the development of affordable units for lower income households in high opportunity areas. There is no clear commitment to zone sites for multi-family development in areas of high opportunity or a commitment to ensure that such units are affordable to all income levels. Further, there is no commitment to match funding opportunties with the identification of available sites to facilitate their development. Notably, the City will not conform with its duty to AFFH if it does not ensure adequate sites for affordable housing for lower income residents in high resource areas. Without clear and enforceable commitments and timelines, this program will not provide a beneficial impact or further fair housing. Furthermore, in order to expeditiously address the lack of housing opportunities accessible to lower-income residents in high resource areas, the timeline of this program should be shortened.

Accordingly, a specific objectives of this program should be changed to (a) assess the number of sites that must be rezoned in high resource areas (as identified in TCAC/ HCD's Opportunity Maps) to effectively AFFH , and (b) rezone the adequate number of sites pursuant to that analysis by December of 2025.

- **Program 3 - Encourage and Facilitate Accessory Dwelling Units (ADUs) (*identified in the AFH as a Meaningful Action)*.** While we support and encourage the development of ADUs, the program does not outline clear commitments that will yield identifiable beneficial outcomes. The program states "a primary objective of this program is to increase the supply of affordable units throughout the city" but fails to identify any specific commitments to take any action on how this objective will be reached. Additionally, building ADUs is generally not an accessible housing option to low income households who cannot afford predevelopment costs associated with ADUs. We recommend additional measures in this program to make ADUs accessible to lower income households such as targeted outreach to low-income homeowners, incentives for landlords to make ADUs affordable, no interest loans for ADU development and waivers for inspection fees Additionally, a dedicated liaison in the Office of Community Affairs should be available for all questions regarding ADUs.

- **Program 8 - Use of Sites in Previous Housing Elements.**. Program 8 should be updated to clarify that streamlined approval will be available to both vacant and non-vacant sites through a zoning amendment. As written it appears that the zoning amendment will only apply to vacant sites included in the 4th and 5th cycle housing elements.

- **Program 9 - Annual Reporting Program.** While we appreciate the sentiment that the City will "engage all members of the Fresno community," and the specific commitment to use multilingual notices and media, the City should revise this program and avoid using vague language with no commitments. To make the public engagement associated with this program meaningful, we recommend that the program include a commitment and associated timeframe for the City to implement input received through its various outreach efforts such as workshops and surveys in addition to the annual public hearing. The annual report should include specific actions the City will take to overcome identified constraints and barriers to complying with Housing Element programs.

- **Program 10 - Incentives for Housing Development (*identified in the AFH as a Meaningful Action)*.**This program does not present a commitment to address housing

production for low-income units or actions that will be taken to complete the program. To facilitate and promote the use of available incentives, the city should make a list of incentives, including density bonus incentives and impact fee waivers, available to the public through an accessible database.

Additionally, the program's current language that it will "identify site opportunities in higher resource areas and …improve access to resources" suffers from the same issues hat program 2 does insofar as it fails to identify clear and enforceable commitments and steps that it will take to ensure the availability of sites for lower income households in high opportunity areas. It is critical for this program's success and the City's role in AFFH that the housing element includes clear, timebound, and enforceable actions to ensure availability of sites for lower income households in high resource areas, as outlined above.

Finally, the City should include enforceable commitments to avoid displacement and gentrification in the Downtown Planning Area, and assess the role that priority processing in the area has on the City's duty to AFFH.

- **Program 11 - Local Housing Trust Fund (*identified in the AFH as a Meaningful Action)*.** The Local Housing Trust Fund is a great tool to alleviate the housing crisis and we are glad to see the City's commitment to leverage State matching funds. We recommend adding the creation of a Community Advisory Board as an action to ensure that projects are driven by a community process and benefit the most impacted residents. Housing advocates have met previously with City staff to develop an equitable Community Advisory Board made up of a diverse group of residents most impacted by housing barriers, legal experts, and small landlords.

- **Program 16 - Surplus Public Lands.** The commitment to release surplus sites appears to simply be a commitment to comply with its existing duties under the Surplus Lands Act. The language is ambiguous, non-committal and must be revised. In addition, the program states the City will "consider depositing a portion of up to 100 percent [of sale proceeds] to the LHTF" We recommend instead that the City commit to depositing 100 percent of sale proceeds into the LHTF.

- **Program 18 – Home Buyer Assistance (*identified in the AFH as a Meaningful Action)*.** While a critical program for many Fresnans, this Program should include

additional commitments to ensure that low-income residents, undocumented residents, residents who speak languages other than English, and residents in racially and /ethnically-concentrated areas of poverty (R/ECAPs) have the opportunity to benefit from these funds. During the 5th Cycle planning period, many residents without social security numbers or who faced language access barriers were unable to apply for the City's homebuyer assistance program. While the City was able to assist nine families with this program, this program must incorporate mechanisms that will allow more families to apply during the next 8-year cycle by addressing barriers and pursuing state funds every year. This program has other deficiencies that must be addressed such as lack of public outreach and lack of interpretation for applicants applying by phone. Solutions include: ensuring that low-income residents are knowledgeable about the programs, undocumented residents are able to successfully apply for this program, including closing costs as part of funding packages. In order to ensure that residents living in R/ECAPs are targeted, we recommend the City create annual reports listing how many applicants were assisted, outreach efforts made and whether they live in R/ECAPs. Due to the concerns outlined above, the program as currently implemented and drafted fails to adhere to HCD's AFFH Guidance that "actions must be specific with timelines, discrete steps and measurable outcomes to have a 'beneficial impact' during the planning period."

- **Program 19 – Housing Choice Voucher Incentive Program (HCV) (*identified in the AFH as a Meaningful Action)*.** This action fails to include meaningful actions with specific timelines, and measurable outcomes to have a "beneficial impact" during the planning period. The program should develop and implement a proactive enforcement program housed within that legal department to ensure HCV . The City should revise this program action to include a timeline of one workshop a month (twelve workshops throughout the year) to ensure residents and landlords are able to access housing quickly and better assist residents/landlords going through any issues that prevent them from using/accepting HCV. Additionally, collaborating with and funding CBOs and fair housing organizations to provide information to voucher holders and landlords on California's source of income discrimination prohibitions. The program should also commit the City of Fresno to finance billboard ads about protections against HCV discrimination and send informational materials to all landlords in Fresno registered in the rental registry regarding HCV. Finally, the program should be revised to include a commitment to actively pursue enforcement against discrimination against voucher-holders and supplementing vouchers with additional subsidies to support voucher use in higher-cost markets in high resource areas. Northeast Fresno has very

limited HCV use, with only four census tracts north of Herndon Avenue containing any HCVs, and of those four tracts, no tract exceeds 5 percent HCV use. By revising the program to include the above recommendations would help address fair housing needs in Fresno.

- **Program 21 – Housing Rehabilitation (*identified in the AFH as a Meaningful Action)*.** Government Code section 8899.50 requires "'meaningful actions" well beyond combating discrimination to overcome patterns of segregation and foster inclusive communities. These actions, as a whole, must address significant disparities in housing needs and in access to opportunity." The current program has failed to address the needs of extremely low income residents and vulnerable populations such as undocumented residents. As we continue to see the negative effects of Climate Change across the world, it is imperative that the City include weatherization such as cooling mechanisms, like heat pumps, air conditioning, insulation and other cooling assets to increase resilience to extreme heat as part of the rehabilitation program. It is a critical and urgent need given that extreme heat kills thousands per year and impacts disadvantaged communities the most. Additionally, the City must establish an acquisition and rehabilitation fund to purchase older, blighted, and/or abandoned homes/buildings. The City of Fresno can establish a revolving fund to insure that rehabilitated homes are sold back to the community at a low cost.Finally, for the program to have a beneficial impact the timeframe section should include 15 rehabilitation grants annually, and 5 distressed property grants using PLHA and CDBG funding for extremely low and low income residents.

- **Program 22 – Comprehensive Code Enforcement.** While we appreciate Code Enforcement's response and the City's diligence to keep increasing staff, there are still additional actions that should be taken to create a comprehensive code enforcement. HCD's AFFH Guidance recommends that "to overcome contributing factors to fair housing and affirmatively further fair housing, actions must consider a wide range of actions across all action areas. The number and scale of actions will depend on the severity of the needs but regardless of need, a cohesive and effective program will consider multiple action areas." This program as written continues to fail to address critical housing issues since the last housing element cycle. The program should be revised to include actions around legally holding landlords accountable for retaliation, unlawful evictions, and harassment towards tenants who file code enforcement complaints such as a commitment to adopt a tenant anti-harassment ordinance. As stated,

we recommend that the City adequately analyze code enforcement's procedures and incorporate tenant feedback for a comprehensive code enforcement program.

- **Program 23 - Special Needs Housing (*identified in the AFH as a Meaningful Action)*.** Much of the language in this program is vague, noncommittal, and does not provide adequate actions in order to provide a beneficial outcome. This program states the City "shall advocate for provision of special needs," "partner with and encourage local and state non profits," and "provide/encourage." These actions are not concrete or specific and provide no assurance of a beneficial impact on persons' with disabilities access to housing. This should be revised to include review and enforcement of compliance with legal requirements for accessibility of multi-family and affordable housing, including in permitting processes, not just "encourage[ing]" accessibility features. Additionally, we recommend that the program add specific actions to remove barriers to housing by special needs groups such as allowing undocumented residents to apply for and receive housing assistance, vouchers and other subsidies unless otherwise required by federal law.

- **Program 26 - Equitable Community Investments (*identified in the AFH as a Meaningful Action)*.** Program 26 states it will "seek funding," "continue to actively seek resources," and "continue implementing the written policies." These commitments are vague and non-committal. There are no actions on how these will be completed and is ambiguous and as a result provides no indication that a beneficial outcome will result from the program and further fair housing. The programs continue not to commit the City to take a lead role in planning, funding, and/or constructing projects or indeed any role beyond identifying issues and needs and seeking funding on an annual basis. Additionally, it should not rely on the General Plan's identification of Priority Areas for Development Incentives in Chapter 12 and should instead use the Urban Displacement Project data to guide investments.

- **Program 28 – Opportunity To Purchase Act (OPA) (*identified in the AFH as a Meaningful Action)*.** Although we appreciate the City's action to initiate research on a local Opportunity to Purchase Act, we strongly recommend that the City implements robust outreach and engagement, in partnership with CBOs that work closely with low-income communities in racially/ethnically-concentrated. Additionally, the program states it "shall research" and "consider establishing an OPA." These are not commitments

and fail to implement any specific, firm, or enforceable commitment such that no beneficial outcome of the action is indicated.

- **Program 29 – Mobile Home Parks (*identified in the AFH as a Meaningful Action)*.** Program 29 contains no commitments, actions, or enforceable language that will ensure a beneficial impact throughout the planning period. Additionally, this program repeats verbatim language included in Program 10A of the 2015-2023 without explaining how or why reliance on the same program action will have better results during the next planning period. With residents like Three Palms and Trails End Mobile Home Park experiencing the negative impacts of slumlords, it is crucial that the City make significant improvements to the program actions. Furthermore, the program must address the need for heat resiliency such as weatherization and insulation especially to older mobile home parks by funding a mobile home park renovation fund for all mobile homes. This fund will help low income families with issues that they need to address due to inspection violations or other habitability concerns. Additionally, this program should include a commitment to penalize and fine mobile home park owners who are not providing adequate and safe conditions for their tenants. For example, Three Palms Mobile Home Park had not had safe drinking water for quite some time and the owner was never made responsible for this clear human rights violation. Finally, consistent with the City's responsibility to AFFH, the program should support quality of life and access to opportunity improvements for all mobilehome parks in Fresno by taking meaningful actions to increase green space, transit, and resources near mobile home parks.

- **Program 30 – Emergency Rental Assistance Program (*identified in the AFH as a Meaningful Action)*.** Although we appreciate the City adding this program, it states that the City will "seek additional funding" and fails to commit ongoing funding that can come from the Local Housing Trust Fund, the General Fund, or its own permanent funding source to ensure a beneficial impact during the planning period. Identification and commitment of a permanent local source of funding by 2024 will highlight a commitment to prevent displacement and protect tenants.

- **Program 31 - Eviction Protection Program (EPP) (*identified in the AFH as a Meaningful Action)*.** The Eviction Protection Program is a critical anti-displacement and anti-homeless tool. However, the program's current language to "seek additional funding to support the "EPP" is not a strong commitment and does not provide indication that a beneficial outcome will occur if funding is not replenished. We strongly recommend that

the City commit to staffing 5 full-time staff for screening so tenants are able to receive help as soon as possible. We also recommend program expansion to include:

- Wide-reaching outreach and education campaigns
- Direct legal representation and assistance for low-income tenants encountering legal issues. This includes but is not limited to being served with a notice from their landlord (e.g. 3-day notice, notice of rent increase, etc.)
- Evaluation of the Eviction Protection Program to ensure it is effective and address issues to improve the program.

- **Program 33 – Homeless Assistance (*identified in the AFH as a Meaningful Action)*.** Program 33 does not commit the City to any concrete action. The program states it will "identify partnership opportunities," "leverage the homeless assistance response team" and "support the Voucher Incentive Program" none of which commit to any enforceable and actionable items. The city must commit to completing an adequate analysis of needs of unhoused City residents. This should include the completion of an AFH analysis of disproportionate needs.

- **Program 34 - At-Risk Housing.** Program 34 includes actions without a clear commitment to take steps that will lessen the severity or impact of the issue in any timeframe. Again, the language is non-commital, vague, and ambiguous in how the program will reach its objective. Additionally, stronger tenant protections should be included as an objective and completed no later than June 2024 for residents facing displacement and an affordable housing resource map for tenants so they have the option to relocate.

* * * * *

Thank you for your consideration of our comments. We look forward to discussing them with you and continuing to work with the state and the City to ensure that the City adopts a Housing Element that fully complies with the law and addresses the serious housing needs and disparities that impact Fresno City residents.

Sincerely,





Valerie Feldman
Staff Attorney
PILP

Karla Martinez
Policy Advocate
LCJA

CC: Hillary Prasad, Housing Policy Specialist, California Department of Housing and Community Development
Jose Ayala, Housing Policy Specialist, California Department of Housing and Community Development
Scott Lichtig, Deputy Attorney General, Bureau of Environmental Justice, Department of Justice
Robert Swanson, Deputy Attorney General, Bureau of Environmental Justice, Department of Justice

Attachment A:
Resident Katie Taylor's Declaration of Industrial Impacts

LEADERSHIP COUNSEL FOR JUSTICE & ACCOUNTABILITY

GOLDEN GATE UNIVERSITY SCHOOL OF LAW
ENVIRONMENTAL LAW AND JUSTICE CLINIC

DECLARATION OF KATIE TAYLOR IN SUPPORT OF SOUTH FRESNO COMMUNITY ALLIANCE'S COMMENTS ON THE CITY OF FRESNO'S GENERAL PLAN FINAL PROGRAMMATIC ENVIRONMENTAL IMPACT REPORT (SCH #2109050005)

I, Ms. Katie Taylor, declare:

1. I am a resident of Fresno, California. For over fifty years, I have lived on Central Avenue near its intersection with Orange Avenue in unincorporated Fresno County, just South of Fresno City limits.

2. The Amazon Fulfillment Center was constructed across the street from my house in 2017. The Ulta Beauty distribution center was built less than half a mile from my house in 2017 as well. There are other large facilities near my house, including the FedEx terminal, that attract traffic. Several other truck terminals and truck stops have been built around my neighborhood in the last few years as well. It seems like there are always new facilities being built nearby.

3. I was never notified that large warehouses were going to be built so close to me. When I saw the orchard trees being plowed down across the street, I did not know why. I thought the property owners were just going to plant more fruit trees. My neighbors thought the same thing. The next thing we knew there were big buildings being constructed. We were not given an opportunity to provide input on whether these projects went forward, the types of impacts they might have on the community, and what types of mitigation to avoid and reduce the projects' impacts might be appropriate. We were not given the opportunity for our voices to be heard.

4. I am not aware of the City ever contacting me or my family to inform us of the City's development of its current General Plan ("2014 General Plan"), the 2014 General Plan Master Environmental Impact Report, the Programmatic Environmental Impact Report for the 2014 General Plan, the Roosevelt Community Plan, or other action to zone or pre-zone land in my neighborhood for industrial land uses.

5. Three of my family members have passed away from cancer. My husband, daughter, and son all died of cancer. Some of my neighbors have died of cancer too. I have a heart condition and thyroid problems. I have allergies as well. My allergies have gotten worse since the warehouses were built. Some of my neighbors' children have asthma, which they say has gotten worse.

6. The construction of the Amazon facility had major impacts on me and my neighborhood. While construction was ongoing for months, the Amazon construction covered my house with dust. The construction occurred at night as well. The nighttime construction was loud and they used very bright lights. The truck traffic during the construction was also extremely loud,

and I could hear the noise from within my home with the windows shut. The construction caused vibrations that were so strong that my house shook on some occasions.

7. Since the Amazon and Ulta facilities began operating, the car and truck traffic in my neighborhood has increased significantly. People who come visit my house are shocked by how much traffic there is now. There is traffic traveling to the facilities 24 hours a day, seven days week. A loud rumbling from the trucks passing can be heard all hours of the day and night. The vibration from the trucks shakes my house. The trucks are so loud sometimes that it sounds like someone is knocking at my door, and it can sometimes be hard to hear visitors talking in my house when trucks pass by.

8. The trucks going to and from the facilities create a lot of dust and fumes, which covers my house and car constantly. I have to clean the dust off the windows of my house and car almost every day. The dust also seeps into my house through cracks in my doors and windows. My neighbors complain about the dust getting inside their houses too.

9. Traffic lights were put up at the intersection of Central and Orange when the Amazon warehouse was constructed. The lights are very bright and blink continuously. They shine into my windows, which disrupts my sleep. My daughter has Down syndrome and autism. The constant flashing of the traffic lights is very disturbing for her because of her condition.

10. I have noticed that my neighborhood has become hotter since the warehouses were constructed, including during the night. I am forced to use my air conditioning more, which increases my energy bill. My neighbors have also noticed that it is hotter, that the neighborhood does not seem to cool down as much in the evening as it used to, and that they have to use their air conditioners more.

11. I have noticed that the traffic from the warehouses affects pedestrians. People I know that walk around the neighborhood have to be very careful because of the traffic. Some of the Amazon employees drive recklessly. I have noticed more accidents because of the traffic from the warehouses. There is frequently congestion from employee vehicles backed onto Orange Avenue near my house.

12. The water pressure at my house has dropped in the last four or five years. I have to pay for a water tank that comes every two weeks. My water is contaminated. One of my family members tested the water and found that it was not safe to drink. A person from UC Davis came and tested my water too and told me not to drink it because of the contamination.

13. I am worried that the value of my house has gone down because of the warehouses and other facilities. I believe that the value of my neighbors' houses has gone down too. This really hurts us because we do not have very much money, my home is my main source of wealth, and we are trying to pass our homes down to our kids to help support them economically.

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Telephone: (559) 369-2790

14. Since about 2017, my neighbors and I have made many efforts to seek that the City stop approving new warehouses and industrial facilities in my neighborhood, that they notify us before studying and approving any new projects and allow us an opportunity to provide input, and that industrial developers and land owners respect these requests. When I and my neighbors have talked to the City and the developers, we tell them about the noise, dust, traffic, health problems, lowered property values, and other impacts from the warehouses and other projects. But they ignore us and keep building projects here without even notifying us first. It feels like we are not being heard. It feels like they are bullying us—like we are being targeted because of our race and because we do not have a lot of money.

15. The traffic, noise, dust, health, and other impacts from the facilities have caused me to suffer from a significant amount of stress and anxiety. For example, the abrupt loud noises and flashing lights are very unnerving and stressful. The heavy traffic from cars and trucks makes me constantly worry about my family's safety. My daughter has also said that she worries about the traffic, noise, and other impacts from the facilities.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration is executed on September 13, 2021, in Fresno, California.

Ms. Katie Taylor

2210 San Joaquin Street, Fresno, California 93721
Telephone: (559) 369-2790

2210 San Joaquin Street, Fresno, California 93721
Telephone: (559) 369-2790

A Nonprofit Housing and Community Development Organization

October 20, 2023

Re: Comment Letter - 6th Cycle 2023-2031 Housing Element Update (HEU)

Dear Partner:

Self-Help Enterprises (SHE) appreciates the opportunity to comment on your 6th Cycle Housing Element Update. We believe it is essential we all work together to identify meaningful opportunities to create affordable housing opportunities in the San Joaquin valley. Our service territory includes San Joaquin, Stanislaus, Mariposa, Merced, Madera, Fresno, Tulare, Kings, and Kern counties. Incorporated as a nonprofit in 1965, SHE has built, acquired, or substantially rehabilitated nearly 16,000 units of home ownership and rental housing exclusively for low-income households in this footprint. Our general comments are outlined below:

1. **Affirmatively Furthering Fair Housing:** It is imperative that cities and counties include as many high or highest resource sites as possible in their Housing Element site inventory. The ratio of these sites to other lower resource sites should be 1:1. The City/County should overlay the high opportunity zones on the housing inventory map to determine sufficient high opportunity sites are included and/or identify additional high opportunity sites to be included in the site inventory. This should be done in accordance with the 2023 California Tax Credit Allocation Committee and the Department of Housing and Community Development Opportunity Mapping Methodology to promote access to opportunities.

2. **Surplus sites:** We encourage City/County partners to adopt a program to review all surplus property within one year of adoption of the Housing Element and make those sites available for the development of affordable housing. There are provisions in the Surplus Land Act (SLA) which allow for an expedited process for sites that qualify as "exempt surplus land" which is land determined by a local agency and verified by HCD and allows for streamlining the process for disposing of land for affordable housing. There are currently scoring incentives for funding affordable housing on surplus sites and it is imperative these sites be identified quickly and made available for the development of affordable housing.

3. **Entitlement Processes:** Increasingly, we have found it expedient to utilize "by right" pathways to project approvals through density bonus law, SB 35 permit streamlining, and the Housing Accountability Act. Frivolous and NIMBY-driven CEQA challenges have been "discovered" in valley communities to delay and sometimes kill projects. It is imperative that cities and counties ensure their ordinances and local practices do not conflict with such streamlined processes. Requirements for Conditional Use Permits in otherwise compatible zoning is to be discouraged wherever possible.

4. **Suitable Sites:** Many jurisdictions in past Housing Element cycles have come up with what may initially look like impressive inventories of available sites, when in fact most have no feasibility for development. Suitable sites must include:

    a. Sewer, water, and dry utilities proximate to the site in question, without a need for upsizing or significant offsite development.

    b. A significant portion of the available acreage in the adequate sites inventory (at least 50%) should have minimum parcel sizes of 2.5 to 3 acres (and larger if onsite storm drainage is required.)

    c. Reasonable densities. In most valley communities' reasonable densities are 20-50 units per acre, and projects below 50 units are generally not feasible in today's funding environment.

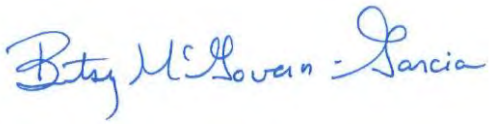
    d. Access to quality transit. The City/County should adopt a program to evaluate the site inventory in relation to the transit system and ensure 75% of the inventory sites available for high density multifamily development are within 0.5 miles of a transit stop.

5. **Manufactured Homes**
   The City/County should consider adding a program to revise its zoning ordinance to add Manufactured Home on a Permanent Foundation to be allowed in all zones that allow single-family residences. The City/County should allow this in the identified zones without requiring a discretionary approval process.

6. **Fee Waivers or Deferral**
   The City/County should consider a fee waiver program for projects that include 100% affordable housing serving households below 80% of area median oncome. If the City/County is unable to waive fees, we strongly encourage deferral for a period not to exceed 30 years with the deferral recorded as a form of deferred note and secured by the property for affordable single-family housing development and 55 years for affordable multi-family housing development. The note would be due and payable if the property were sold, refinanced, or the rent is no longer affordable (with multifamily properties), or is no longer occupied by the owner (single-family home).

Thank you for the opportunity to comment on your Housing Element. Self-Help Enterprises is available to serve as an affordable housing resource and we encourage you to reach out if you ever have questions on how to promote and support affordable housing development in your community. If you are interested in consultation, please contact me at betsyg@selfhelpenterprises.org or at (559) 802-1653.

Sincerely,



Betsy McGovern-Garcia
Vice President

EMAIL TO: housingelement@fresno.gov BY AUGUST 15TH!
SUBJECT: MJHE Plan 2 and PLAN 3

The following are my reasons for opposing Plans 2 and 3:

1- Your MJHE Plan is a Plan which takes a law passed in Sacramento to address the issues of homelessness and housing shortages and arrives at "A SACRAMENTO SOLUTION".

Homelessness & housing shortages are conditions that WE IN THIS NEIGHBORHOOD did NOT create!

2. ***ADU's (Plan 2)***- Most of us chose this neighborhood BECAUSE it is zoned "Single-Family Residential". AARP cites that "ADUs change the character of a neighborhood and cause problems for a community that was NOT BUILT for higher density". We SAVED to buy our homes in this lower density neighborhood!

3. Your "Masterpiece Plan" presents a VERY ONE-SIDED VIEW of ADUs. It emphasizes "Make an income/extra money. House extra family or caregivers." Shame on you for not providing FULL DISCLOSURE of the downside to ADUs to any and all interested parties!

4. In reviewing professional, expert opinions, we are advised "DO NOT COUNT ON ADU INCOME TO LIVE ON... due to the frequent jurisdictional changes [for rentals] that occur". (Think Covid- property owners were unable to evict for non-payment, unable to collect rent owed, owners are limited to a "Sacramento-fixed" percentage of raising rent depending on how many rentals they owned- just to identify a few issues.)

5. Your Plan states placing ADUs in single-family neighborhoods with higher median incomes is to "facilitate housing mobility opportunities for lower-income households..." (Pg 1E-4-17).

This is nothing more than a "Calif Social Experiment"!

Your Plan has no mention of:

6. ... the costs and responsibilities involved in rental units that eat into passive rent income. Yet you hilight income...

7. ... how extra POLICE or FIRE PROTECTION will be provided at a time when our Mayor and Chiefs of Police & Fire are desperate for recruits to fill CURRENT vacancies. Then there are CITY RENTAL INSPECTIONS!

8. ... details like parked cars crowding our streets, about how adding mailboxes or garbage cans will be determined, the disruption to the privacy of neighbors and those in the main home w/ADU renters coming or going.

9. ... about a home that is already a rental. Can the property owner simply ADD an ADU if the current renter objects?

10. ***Low-Income Housing (Plan 3)-*** Fresno's low-income housing is poorly kept. I OBJECT to what becomes eyesores in my neighborhood!

11. Building low-income, multi-family units in our neighborhood- in your "Infill Opportunity Zones" or ANY "rezoned" property- again brings up the issue of A LACK OF police and fire personnel.

12. In the *Wall Street Journal*, 8/8/23, front page HEADLINES- "*Apartment Landlords Face Peril As Their Debt Costs Skyrocket*". Talk about housing that will be falling apart, will be unattended, and become *OUR NEIGHBORHOOD'S PROBLEM*...

13. Incorporating your Plans 2 & 3 into NEW areas of building homes- NOT IN EXISTING SINGLE-FAMILY, LOW-DENSITY NEIGHBORHOODS- is where these plans need to be enacted. Home buyers will KNOW what they're getting, they'll KNOW what the residential components will be/are, and these buyers will have 100% awareness of the decision they make to buy in such a neighborhood. It is CRUEL to inflict these misguided plans on our neighborhoods!

14. HERE'S TWO IDEAS-

A- CONTINUE the outstanding efforts to remodel and repurpose the motels and inns that have fallen into disrepair or been abandoned and use these for low-income/homeless opportunities.

B- Bring in the "NECESSARY RESOURCES" to these sites.

Thank you,

ALLAN + BRENDA WONG 8/12/2023

From: Susan B. <[redacted]>
Sent: Wednesday, August 16, 2023 2:13 PM
To: HousingElement <HousingElement@fresno.gov>
Subject: Comments on Fresno City Planning

External Email: Use caution with links and attachments

To whom it may concern

I attended the meeting at Nelson Elementary with the planning group. It is clear that expanding affordable housing is and will be a pervasive issue especially in California.

As a local homeowner I object to the proposal to mix our established single family neighborhood with any version of higher density building. I am also concerned about the various financial incentives to the land owner/developer and the city; that puts their interests counter to mine as any high density housing will lower my property values.

Thank you for your consideration of my concerns.

Best - Susan Barrows

To Whom it may Concern,

This housing plan is so flawed it is hard to know where to begin to critique it first. I suppose a good start is the attempt to hide the plan from the public by holding the public comment meeting during the month of August, a month when many of the potential citizens at risk from this plan would be on vacation and otherwise unavailable for comment.

The basic premise of the plan is that it is only "equitable" for the majority of the rezoning for low income housing to occur in "high resource" areas, which is another way of stating high income neighborhoods. This is egregiously unfair to current homeowners in these neighborhoods, who chose to buy their homes when existing zoning laws stipulated that these neighborhoods were ONLY for single family homes of a specified lot size. If the rules of the game are to be changed, it is only fair that commingling of low and high income housing only occur in new areas of property development, where potential home owners know from the beginning that they are buying into a mixed ownership neighborhood. Purchasing a home is one of the largest investments most people make during their lifetime. Allowing low income housing in high income neighborhoods will destroy the property values in those areas where people have chosen to invest their life savings in their homes. Not only is this manifestly unfair, it represents an untested socialist belief that "seeding" these neighborhoods with the poor will somehow improve their lot in life. What it will achieve instead is the degradation of once stable communities and an erosion of the property values of these communities.

I strenuously object to almost all elements of this plan and would urge that more meetings, well announced to the public in advance, be conducted to review any potential plans before their implementation. Furthermore, in the interest of transparency, all financial incentives for developers, current property owners, and municipalities need to be explicitly delineated for the public to understand potential conflicts of interest.

Sincerely yours,
Stephen P. Yeagle
[redacted]
Fresno, CA 93711

From: Michael O'Banion <[redacted]>
Sent: Wednesday, August 16, 2023 7:29 PM
To: HousingElement <HousingElement@fresno.gov>
Subject: Fresno Multi-Jurisdictional Housing Element

External Email: Use caution with links and attachments

Hello,

I am a long time resident of northwest Fresno at address:

[redacted]

I am concerned about the Fresno Multi-Jurisdictional Housing Element program disrupting the neighborhood that I have called home for years. When my neighborhood was developed, it was zoned for single family dwellings and not multi-family residences and whatnot. We feel this program is unfair to the long-time property owners in this area who purchased and built homes with the understanding the single family zoning laws would be upheld and honored - not have the rules changed at a later date.

Thanks,

Mike O'Banion

August 16, 2023

Mayor Jerry Dyer
Fresno City Councilmembers
Michelle Zumwalt, Planning and Development Department
2600 Fresno Street, Room Fresno, CA 93721

RE: City of Fresno Draft 6th Cycle Housing Element

Dear Mayor Dyer, Councilmember, and Ms. Zumwalt:

Leadership Counsel for Justice and Accountability write in collaboration with the Public Interest Law Project ("PILP") and residents of South Fresno neighborhoods impacted by the severe lack of decent quality, affordable, and permanent housing options and gaping disparities in access to opportunity in Fresno to provide comments on the July 2023 Draft Appendix 1-E: City of Fresno of the Fresno Multi-Jurisdictional 2023-2031 Housing Element ("City of Fresno Draft Housing Element" or "Draft Element").

Leadership Counsel works alongside the most impacted communities to advocate for sound policy and eradicate injustice to secure equal access to opportunity regardless of wealth, race, income, and place. Leadership Counsel advocates for policy and practice changes to meet the housing needs of all residents in Fresno, especially low-income and residents with special housing needs, and to overcome fair housing disparities that impact low-income communities of color. Residents with whom we partner experience high rates of cost burden and escalating housing costs, reside in unsafe and unsanitary rental housing conditions, and ever-present and magnifying displacement risks and are simultaneously impacted by striking disparities in access to opportunity compared to more affluent Fresno neighborhoods, including a lack of access to a healthy environment and public and private investment in critical infrastructure, services, and amenities.

The Public Interest Law Project (PILP) works statewide to support local legal programs that address issues involving housing, land use, public benefits and homelessness. PILP has been providing substantive training, litigation support, and technical assistance in these areas for over 25 years.

The City of Fresno's 6th cycle housing element update presents a critical opportunity for the City to identify and address long-standing, wide-ranging, and severe housing needs and fair housing disparities that impact the City's residents, disadvantaged communities, and racially and

ethnically concentrated areas of poverty ("R/ECAPs"), in particular, the Southwest, South Central and Southeast areas. The City must ensure that it does not miss this opportunity to develop and adopt a housing element that complies with the State Housing Element Law and civil rights laws and that meaningfully incorporates the input of lower-income residents and protected classes and the community-based organizations that work alongside them.

Our comments below highlight further steps and actions the City must take to meet State Housing Element Law requirements. In short, the Draft Element must be revised in order to meet Fresno's housing needs and relevant statutory requirements in several different ways, including:

- Incorporate input regarding key housing issues and disparities and actions needed to address those issues provided to the City by community members as required by HCD's AFFH Guidance;
- Revise the constraint analysis to address non-governmental constraints, as well as constraints on supportive housing and the maintenance of the housing stock.
- Revise the AFH analysis to consider all of the required displacement factors, barriers in access to opportunity, and fair housing issues associated with the Draft Sites Inventory;
- Revise programs to include specific actions and deadlines and add programs that will result in a beneficial impact on Fresno housing needs and disparities during the planning period and overcome patterns of segregation and foster inclusive communities, including but not limited programs 14, 15, 19, 23, 29, and 33;
- Revise the site inventory analysis to exclude projects that have not been approved during the projection period, include a realistic capacity calculation based on development throughout the 5th cycle, and determine the adequacy of the non-vacant site

I. The City Has Not Diligently Engaged the Public As Required, Because the Draft Element Fails to Adequately Reflect Public Input

The City's obligations to diligently engage all economic segments of the community and to affirmatively further fair housing through the housing element require more than just seeking input about the contents of the housing element. Government Code sections 65583(c)(8), 65583(10)(a) & 8899.50. Inviting residents to provide input but failing to incorporate that input into the housing element undermines the purpose of resident participation in the housing element update, fosters distrust, and fails to constitute "engagement" as required by section 65583(c)(8) of the Housing Element Law. HCD's Affirmatively Furthering Fair Housing ("AFFH") Guidance

states that housing elements must describe "a summary of [public] comments and how the comments are considered and incorporated (including comments that were not incorporated), particularly with changes to the housing element. HCD, Affirmatively Furthering Fair Housing: Guidance for all Public Entities and for Housing Element ("AFFH Guidance"), 2021, p. 22.[1] While the Draft Element provides some description of public input provided, its summary of public comments generally lacks sufficient detail for the reader to understand the nature of the issue raised or the solution proposed. In addition, the Draft Element fails to demonstrate the City's incorporation of input provided and to identify input the City chose not to incorporate as required. For example, at the March 1, 2023 community workshop on the housing element update held at Helm Home, residents identified the establishment of rent control, tenant assistance and protections, and reducing barriers to undocumented residents as among their top suggestions and solutions. The Draft Element fails to demonstrate how this solution will be incorporated into the final draft and to even to study the housing needs of undocumented residents.

The Draft Element also fails to acknowledge, discuss, or incorporate recommendations contained in the letter submitted to the City by Leadership Counsel and several other community-based organizations in February 2023 relating to the development of this Draft. *Attachment 1, Leadership Counsel February 2023 Letter.* The letter identifies policies and programs which the signatory organizations believe should be prioritized in the housing element update, based on our direct and daily work with low-income residents of color, farmworkers, residents of disadvantaged unincorporated communities, and other residents with special housing needs and members of protected classes. The City must revise the draft element to acknowledge this letter, summarize its contents, and revise goals, policies, and programs to incorporate its recommendations, in addition to other input it receives. The City must also revise the element to indicate what public input it chose not to incorporate, which the element currently fails to do.

II. The Housing Element Fails to Adequately Analyze and Remove Governmental Constraints to Housing Development

To fully comply with Housing Element law, the City of Fresno must identify constraints to the development of housing affordable to households at different income levels, as well as possible constraints to the development and maintenance of a variety of types of housing, including supportive housing, single room occupancy units, emergency shelters, and transitional housing. *See Gov't Code* §65583(a)(5) and (c)(1). This analysis includes potential and actual governmental constraints upon the maintenance, improvement, or development of housing for all

[1] All references to code sections hereafter refer to the Government Code unless stated otherwise.

income levels. Gov't Code § 65583(a)(5). Following a close analysis, the City must include a description of efforts to remove constraints and a program to remove those constraints. Gov't Code §65583(c)(3).

A. Land Use Controls Are Under-Analyzed as a Constraint

The Housing Element under analyzes the impacts of current and planned zoning regulations on housing development. A jurisdiction must include an analysis of potential and actual governmental constraints, including land use controls that directly impact the cost and supply of residential development. Gov't Code § 65583(a)(5). The constraints analysis fails to demonstrate the direct connection between its currently proposed zoning on cost and supply of housing.

The City has not adequately analyzed the effects of constraints associated with wide-spread availability of single family zoning and the limited availability of high density zoned sites. For example, the HE acknowledges "growth in the City of Fresno over the past few decades has traditionally been low density suburban development, which has resulted in conditions of sprawl in various areas of the city.[2] Despite the acknowledgement, the City continues to allow by right single-family units in. Despite the historical preference for single family development, the abundance of available single family homes in Fresno, and the underproduction of affordable housing,the the City still permits single family uses by-right in many of the zones identified for increased high-density development: RM-1, NMX, CMX, RMX, CMS, CR, DTN, DTG.

Further, although single family development is allowed in almost every zone that permits residential development, higher-density units are not allowed in certain areas in the City. For example, multi-family units are not allowed in RS-1, RS-2, or RS-3 areas, despite the large majority of the City being zoned one of these zones, and where many high resource areas have developed.[3] Duplexes are similarly constrained, they are excluded from RS-1, RS-2, RS-3, RS-4, and only allowed through conditional use permit in R-5.

Because both single-family and multi-family development is permitted in most residential zones, it puts multi-family developers in competition with single family developers for the same sites.

Single family units also benefit from reduced permitting timelines. For single--family developments it typically takes up to 30 days for developers to pull building permits after its

[2] Fresno Multi-Jurisdictional Housing Element July 2023, Appendix 1E: City of Fresno, 1E-4-1.
[3] City of Fresno, 2023. Data downloaded from HCD AFFH Data and Mapping Tool in 2021, based on ACS data.

entitlements are approved.[4] In contrast, based on recent projects, it can take three months to a year for multifamily developers to receive building permits after entitlements.[5] Although the Draft concluded that higher permit processing schedules for multi-family units compared to single family units are not a constraint, the increased complexity and expected timeline does appear to act as a constraint on multi-family development based on the very low production number of multi-family housing in the 5th cycle. .[6]

B. Land Use Controls' Effect on Types of Housing

A complete constraint analysis does not only focus on housing by income levels but must also consider constraints to the different types of housing.. As noted above, the Draft constraint analysis must examine what constraints exist to the development of : supportive housing, transitional housing, single room occupancy units, and emergency shelters. Gov't Code 65583(c)(1)

1. Single Room Occupancy (SRO) Units

The City's constraint analysis regarding SRO's should examine more than the limit on the number of units but also where SRO's are permitted to develop. SRO's are a crucial source of affordable housing for many people and can augment the deed restricted affordable housing available to lower income people. The City should commit not only to removing the limit on the number of units that can be contained in an SRO but also add it as a permitted use in the following zones:

RM-MH, RM-2, and downtown while removing conditional use permit requirements from RM-2, RM-3, NMX, CMX, and RMX.

2. Emergency Shelters

The Draft must consider whether its development standards act as a constraint on the development of emergency shelters. Although the City seems to determine that its requirements do not act as a constraint to the development of shelters it also states it may consider making further amendments to the development code to remove any possible constraints. If further amendments are necessary, especially any needed to comply with Government Code section 65583(a)(4)(A), the City should commit to making those changes immediately. For instance, the City's current requirement for the number of toilets per person in a shelter (Muni Code section

[4] Fresno Multi-Jurisdictional Housing Element July 2023, Appendix 1E: City of Fresno, 1E-4-35
[5] Fresno Multi-Jurisdictional Housing Element July 2023, Appendix 1E: City of Fresno, 1E-4-35
[6] Fresno Multi-Jurisdictional Housing Element July 2023, Appendix 1E: City of Fresno, 1E-4-38

15-2729), if it exceeds the building code requirement is a likely constraint on the development of shelters because of the additional cost it adds to this type of development.

3. Supportive Housing

The Draft is silent as to whether the development oecd complies with Government Code section 65583(c)(3) that allows supportive housing in any zone where multi-unit or mixed use development is permitted. If the City's code does not reflect this requirement that is a constraint on housing for people with disabilities and a program to revise the development code to comply with the statute is required.

4. The HE Under-Analyzes Parking Requirement Effects on Housing Construction

The Draft fails to fully analyze whether its parking requirements act as a constraint on housing development, especially in the downtown and along transit corridors. Parking requirements increase the cost of housing.[7] The Draft states it "determines the required number of parking spaces based on the type and size of the residential unit and has found the required parking spaces to be necessary to accommodate the number of vehicles typically associated with each residence."[8] The analysis ignores principles of induced demand and downstream effects of entrenching car-centric land use. The Draft implicitly acknowledges that parking increases costs and may not be critical as it allows waivers for parking requirements in affordable housing developments and other transit-friendly areas.[9] The ad hoc basis of reduced parking requirements introduces uncertainty which can increase the overall cost and time delays in housing development.

Recently, the City has made clear how much of an impediment parking really is. In negotiations with the state to receive a large grant to support increased housing in downtown Fresno, the City earmarked about $70 million of a possible $250 million grant for two new parking structures in the downtown area. Mayor Jerry Dyer stated [the cost of parking structures] "is always a big challenge for us when we try to bring in developers to build housing… Taking that off the table allows for these projects not only to occur faster, but it allows the developers to be more incentivized to build in our downtown area."[10]

[7] http://database.greentrip.org/
[8] Fresno Multi-Jurisdictional Housing Element July 2023, Appendix 1E: City of Fresno, 1E-4-10
[9] Fresno Multi-Jurisdictional Housing Element July 2023, Appendix 1E: City of Fresno, 1E-4-10
[10] https://www.fresnobee.com/news/local/article275363746.html

Although parking has been identified as a constraint to increased housing development, the City has not put forward a program to identify steps to remove the constraint. The City asserts "[p]parking standards are one area where many communities are seeking to decrease housing costs."[11] Yet, minimum parking requirements are squarely within the control of the jurisdiction and could be reduced if the City so decided. The direct link on parking's costs in relation to housing development in Fresno must be further analyzed, and a reduction in parking requirements is likely required.

C. Risk Analysis and Distribution of Affordable Housing

The Draft's analysis of at-risk housing is incomplete. under-analyzes the risks to publicly assisted affordable housing and its distribution. There are more than 8,500 publicly assisted affordable housing units in the City of Fresno.[12]. The Draft identified 695 units at risk of conversion to uses other than low-income residential within 10 years from the housing element adoption deadline.[13] Although the City of Fresno considered the cost of replacing the at-risk units as required under §65583(a)(8), it failed to examine which pathway would be most appropriate for the City and what constraints, if any, would be associated with the pathway chosen.

The City's lack of tenant protections, such as source of income discrimination outreach and education, rent control, just cause protections may operate as a constraint on the maintenance of housing available to lower income people and facilitate the displacement of lower income renters. The lack of these protections should be analyzed as a constraint on the maintenance of housing under Government Code section 65583(a)(5).

III. The Housing Element Fails to Adequately Analyze and Remove Non-Governmental Constraints to Housing Development

In addition to analyzing governmental constraints, the HE must also analyze the potential and actual nongovernmental constraints upon the maintenance, improvement, or development of housing for all income levels. Gov't Code § 65583(a)(6). To that end, the Draft failed to consider the effect of market forces, availability of financing, environmental concerns, and NIMBY opposition.

[11] Fresno Multi-Jurisdictional Housing Element July 2023, Appendix 1E: City of Fresno, 1E-4-14
[12] Fresno Multi-Jurisdictional Housing Element July 2023, Appendix 1E: City of Fresno, 1E-4-55
[13] Fresno Multi-Jurisdictional Housing Element July 2023, Appendix 1E: City of Fresno, 1E-4-55

A. NIMBY Opposition

The Draft must include an analysis of NIMBY opposition to housing development. As a largely sprawling suburban City, Fresno is prone to local opposition to increased density from existing single-family homeowners that have preconceived ideas of the impacts of increased density on their neighborhoods. Further, the zoning code requires conditional use permits for duplexes and multi-family housing in some areas, making them especially susceptible to opposition and defeat from NIMBY residents.

The chilling effect of NIMBY opposition to housing development is not a foreign concept to jurisdictions in Fresno County. For example, in the adjacent City of Clovis, the Clovis City Council recently voted to shut down a proposed 40-unit development near Old Town Clovis because neighbors expressed concerns about traffic congestion, overflow parking and the "monolithic" height of the planned apartment building.[14] NIMBY opposition to housing development is a widespread phenomenon across California but is especially prevalent in areas that have historically been primarily low-density developments. The Draft's failure to analyze NIMBY opposition as a constraint must be addressed in the City's next Housing Element draft, and the City should include a program to reduce this type of opposition by ensuring that more than single family developments are permitted by-right and reducing the discretionary review of multi-family housing.

B. Environmental Concerns

The Draft did not consider environmental constraints as part of its analysis under 65583(a)(6). Environmental constraints may include limitations to water supply, nearby pollution, or infrastructure development.

The City of Fresno relies heavily on groundwater and surface water. As climate change makes water availability less predictable the City must analyze how an increased population and land use will affect water availability and whether water availability will eventually constrain growth.

Further, separate from water availability, the City must consider the infrastructure requirements of delivering water to a denser population. For example, the City estimates that downtown Fresno, where a large portion of new housing development is projected, currently requires significant water and wastewater infrastructure upgrades. Broke Broche, the City's director of public utilities, estimated that downtown Fresno would require between $160-$180

[14] https://www.fresnobee.com/fresnoland/article255749376.html

million in water and wastewater upgrades to support planned housing development.[15] The Draft should analyze the cost of these needed improvements as a possible constraint on development.

Finally, the Draft failed to consider industrial and polluting industries' effect on future housing development. The City of Fresno has evolved as a car dependent City surrounded by heavy industry and highways. Therefore, future housing development will need to carefully consider placement and mitigation measures to avoid perpetuating environmental inequity.

C. Market Forces and Availability of Financing

The Draft failed to include an explanation of current housing development trends and applications across all income levels. Market forces are relevant to the types of housing that are likely to develop in the future. Once this analysis is done it might make it clear what actions the City must take, such as further financing for programs.. Using the example mentioned above, requiring private investment to implement required infrastructure in downtown Fresno would likely make housing development in the area infeasible. Similarly, lower margins or a lack of developer interest in serving lower income portions of the market may require the City to provide incentives to spur greater housing development in the segment. Without a proper analysis such a conclusion is impossible and falls short of the requirements listed in Government Code § 65583(a)(6).

For example, Fresno had some of the highest rental price increases in the country, with a 28% increase in one-bedroom rent prices between January 2021 and January 2022.[16] The spike in rent prices disproportionately affects low-income individuals who are often on fixed incomes or receive low wages that have not kept up with the rapid rise in rents. Further, existing conditions in many rental units in Fresno have failed to keep up with required maintenance and would fail habitability requirements.[17] The combination of unmaintained housing in Fresno alongside rising rents was not analyzed as a constraint. As a result, the condition of housing stock available to low-income populations must be analyzed and the City must take steps to redress those constraints identified.

[15] https://www.fresnobee.com/news/local/article275363746.html
[16] https://www.fresnobee.com/fresnoland/article258073823.html
[17] https://www.fresnobee.com/fresnoland/article251600613.html

IV. <u>Further Revisions and Analysis are needed to determine if the City's Draft Includes Adequate Sites</u>

A. Regional Housing Need Allocation (RHNA)

The City's calculation of the RHNA it must accommodate must be revised to exclude units that have not been approved during the projection period. State law permits cities to reduce the number of units they must accommodate in their inventory of adequate sites, by income level, by the number of units approved or permitted since the beginning of the planning period:

> Projects that have been approved, permitted, or received a certificate of occupancy since the beginning of the RHNA projected period may be credited toward meeting the RHNA allocation based on the affordability and unit count of the development. For these projects, affordability is based on the actual or projected sale prices, rent levels, or other mechanisms establishing affordability in the planning period of the units within the project. See HCD's Housing Element Sites Inventory Guidebook, p. 5, available at https://www.hcd.ca.gov/community-development/housing-element/housing-element-memos/docs/sites_inventory_memo_final06102020.pdf

The City's Draft Element appears to take credit for units that are still under review and have not yet been approved or permitted. The Draft Element cannot claim credit, meaning reduce the RHNA, with the following projects because project approvals have not been obtained for these units: Villa Baraca Apartments (P-1); DADA Lofts (p-13)(indicates the application is still being reviewed); Lincoln Park Apartments (P-16); Starling Townhomes (P-17); Latitudes at Armstrong (P-18); Helm Tower Office and Lofts (P-19); Elm Avenue Living (P-21); Majestic Palm Apartments (P-22); and, Los Pueblos Apartments (P-23).

The Number of sites needed to accommodate the RHNA should reflect the removal of the above-described projects.

B. Capacity calculation

If a site does not have a required minimum density then the City must analyze the development capacity based on the patterns of typical development patterns in the same zone. The City uses a very narrow time frame to assess the development capacity of projects in the City – 2018-2020, it is unclear why the City has chosen such a narrow time frame but in order to assess if the Draft's capacity calculations truly reflect realistic development patterns the City should use a broader time frame to establish the types of developments and capacity typically achieved.

Also, the Draft should explain why the capacity calculation for the RM-1 zone was rounded down from 85 percent to 80 percent, while the same calculation was rounded up from 77 percent to 80 percent in the RM-3 zone.

The City has chosen not to rely on the minimum density to calculate capacity on some mixed-use zone site (NMX, CMX, RMX) and because there are no maximum densities imposed, the City instead creates a formula that determines what is likely "reasonable density" density that could develop on these sites and then divides that "reasonable density" in half to determine the Capacity for the site. This formula is flawed because it relies on very few submitted projects (that may not be approved) to determine what reasonable density might be during this planning period. It is crucial that the capacity calculation accurately reflects patterns of development especially where the City intends to accommodate a significant portion of the lower income RHNA (72 percent) on mixed-use sites. Two examples are not sufficient to establish a pattern of development.

Although the City relies less on the Downtown sites to accommodate the lower income RHNA, a correct calculation of capacity is still crucial in the DTC, DTG, and DTN zones and the DTN-AH overlay. And again, the City relies on very few projects during a very limited time period (2018-2020) to support its calculation for realistic capacity on downtown sites.

C. Non-vacant Sites

Non-vacant sites must demonstrate through the City's methodology that they are feasible for residential development during the planning period. Government Code section 65583.2(g)(1). The methodology is required to consider certain factors. *Id*. The July Draft Element includes a description of the current use of the sites but the analysis must be revised to apply the required factors[18] in order to assess the availability and feasibility of these sites for residential development during the planning period beginning in December 2023, including the City's past experience converting existing uses to higher density residential development.

[18] The methodology shall consider factors including the extent to which existing uses may constitute an impediment to additional residential development, the city's or county's past experience with converting existing uses to higher density residential development, the current market demand for the existing use, an analysis of any existing leases or other contracts that would perpetuate the existing use or prevent redevelopment of the site for additional residential development, development trends, market conditions, and regulatory or other incentives or standards to encourage additional residential development on these sites. Gov. Code section 65583.2(g)(1).

D. Large Sites and Concentrated Sites

The July Draft requires revisions to provide examples of whether "sites of equivalent size were successfully developed during the prior planning period for an equivalent number of lower income housing units as projected for the site…" Gov. Code section 65583.2(c)(2)(B). The Draft must also be revised to specifically identify what portions of the large parcels will accommodate the lower income housing needs in the City. The City is correct to assume that 100 percent of large sites, a site that is over 10 acres, will not likely develop for affordable housing. This is due, in part, to the limitation of available funding mechanisms for projects of over 200 units. But, identifying so many large parcels to accommodate housing for the lower income RHNA in close proximity to each other also acts as a constraint on development as affordable housing due to the same funding limitations. To be clear, identifying a large percentage of the sites to accommodate the lower income RHNA in close proximity to each other is a constraint on obtaining funding for affordable housing, funding which is critical to developing affordable housing, and it will create an obstacle to the development of these sites as affordable housing.

In addition, many of these sites are also concentrated in one area of the City and that also prevents the City from meeting its duties to remove patterns of segregation and comply with its duty to affirmatively further fair housing. [As mentioned in the AFFH section above, the over concentration of sites intended to accommodate the lower income housing need in specific areas of the City is inconsistent with the City's duty to Affirmatively Further Fair Housing.]

As noted above the City's inventory of available sites will need revisions and further analysis in order to determine whether the City has identified adequate sites to accommodate its RHNA for this planning period.

V. The Assessment of Fair Housing Fails to Comply with Section 65583(c)(10)

For generations, local mayors and council members have described Fresno as a "tail of two cities", an illusion to Charles Dickens' tragic 1859 novel of pre-revolution France, in acknowledgement of the outstanding disparities in quality of life and access to opportunity that exists between neighborhoods in the Northern and Southern portions of the City and the striking racial and economic differences that underlie them. Studies and data have repeatedly confirmed not only that South Fresno neighborhoods and people of color in Fresno are impacted by a severe lack of access to housing choice and access to opportunity across many indicators compared to North Fresno neighborhoods and White residents, but that the disparities impacting South Fresno, people of color and other protected classes stand out as among the most significant in the state and the country. The City's duty to AFFH through the Housing Element and to complete an

Assessment of Fair Housing in order to do so presents the City with a crucial new opportunity to address the intergenerational disparities and barriers to opportunity that persist in Fresno. Unfortunately, as discussed further below, the AFH lacks information and analysis and fails to incorporate public input as necessary to address the requirements set forth in Section 65583(c)(10) and does not achieve the requirement to ensure that the City AFFHs through its housing element.

A. Integration and Segregation and R/ECAP and Concentrated Area of Affluence Analyses Lack Required Detail

The AFH's analyses of patterns of integration and segregation and R/ECAPs and Racially Concentrated Areas of Affluence ("RCAAs") fail to address important factors which must be considered as part of a complete analysis pursuant to section 65583(c)(10)(A)(ii) and HCD's AFFH Guidelines. *See* AFFH Guidelines, pp. 30-34. These gaps render the AFH analysis incomplete and include but are not limited to the following:

- Failure to provide any data or analyze integration and segregation patterns for racial groups other than Hispanic/Latinos. Table 1:E-3.1, "Population by Race and Hisppanic Origin, Fresno, 2000-2020," provides data about the share of the population of different racial groups in Fresno in 2000, 2010, and 2020, but no data is included that addresses the spatial composition and segregation or integration status of Black, AAPI, Native American, and other racial and ethnic groups. Similarly, the analysis fails to identify groups experiencing the highest levels of segregation as required. AFFH Guidelines, p. 31.
- Failure to accurately or thoroughly analyze distribution of low- and high-income households across Fresno. The Figure 1E-3.4, Median Household Income, Fresno, 2019 indicates median income levels across the City and depicts median incomes of $100,000 or over in some areas West of State Route 99, Northwest Fresno, Northeast Fresno, and in the Sunnyside neighborhood of South Fresno. Yet the AFH's analysis of the data depicted by the map fails to acknowledge these high-income neighborhoods throughout the City, stating only that "Northwest neighborhoods of the city…have the highest median incomes. Otherwise, most of the remaining census block groups in the city have household incomes that fall below the statewide median indicating high poverty levels." This analysis washes out important information about relative income levels across Fresno, including concentrations of high-income households and low-income households in specific neighborhoods, which should be used to inform and geographically-target programs and the location of sites included in the inventory to AFFH. *See* HCD

Guidelines, p. 32. For neighborhoods like West Fresno, which experience particularly acute barriers to opportunity linked to policies and practices that created and enforced segregation, an accurate and complete analysis and programs that respond to that analysis are essential.

- The AFH's analysis of R/ECAPs and RCAAs fails to address "public participation, past policies, practices, [and] investments" as required. HCD Guidance, p. 33. The R/ECAP analysis provides only the generic statement that "R/ECAPs generally have less private investment from financial institutions, grocery stores, and other retail outlets," but does not provide any analysis specific to Fresno City or regional policies, practices, and investments that contributed to the creation and/or perpetuation of R/ECAPs. The RCAA analysis only identifies that 18 RCAAs exist in Fresno, with no analysis at all of the factors giving rise to those RCAAs or their persistence or variation over time nor does it consider any public input on this topic.

As a result of these and other deficiencies, the AFH's analysis of integration and segregation and R/ECAPs and RCAAs is incomplete. The analysis and the Draft Element's contributing factors, goals and actions must be revised accordingly.

B. Incomplete Analysis of Disproportionate Housing Needs Based on Race, Ethnicity, Familial Status, Disability, and Income

The analysis of disproportionate housing needs must analyze needs relating to cost burden, overcrowding, substandard housing, homelessness and other factors for protected characteristics, including at least race and ethnicity, familial status, persons with disabilities, and income. § 65583(c)(10)(A)(ii); AFFH Guidance, p. 39. Disproportionate housing needs "generally refers to a condition in which there are significant disparities in the proportion of members of a protected class experiencing a category of housing need" compared to the proportion of members of other relevant groups or the total population HCD's guidance emphasizes that local data and knowledge are particularly important to this analysis. *Id.* The requirement to analyze disproportionate housing needs is fundamental to achieving the purpose of the AFH to ensure that the housing element affirmatively further fair housing by identifying disparities impacting protected classes which have been subject to historic discrimination, describes the factors contributing to those disparities, and adopts meaningful actions that overcome patterns of segregation and address disparities in housing needs and opportunity for protected classes. Yet, the AFH fails to satisfy this requirement. While it provides the percentage of households experiencing any one of four specified housing problems - lack of complete kitchen facilities, lack of complete plumbing facilities, overcrowding, cost burden – by race and ethnicity, the analysis of overcrowding, cost burden, and substandard conditions only addresses

the prevalence of those housing issues based on housing tenure (renter or owner) and census tract. The analysis fails to include any information about the separate occurrence of overcrowding, cost burden, and substandard housing conditions based on race or ethnicity and fails to provide any information at all about how these factors disproportionately impact Fresno residents based on familial status and disability. While the AFH includes some data relating to the race, gender, and mental disability of unhoused residents, it fails to include information relating to familial status. Further, the analysis includes no information that reflects "local knowledge" or public input, depriving the analysis of details about specific housing needs within the categories identified above and the scale of those needs in relation to others.

The City must supplement its disproportionate needs analysis to include the required demographic information and revise the AFH further to ensure its contributing factors and meaningful actions reflect that information.

C. Displacement Risk Analysis Fails to Consider Relevant Housing Cost, Tenant Protection, Land Use, and Environmental Risks

The AFH evaluation of displacement risk consists of the identification of census tracts which qualify as "sensitive communities" that may be vulnerable to displacement as a result of rising housing costs and market-based displacement pressures based on demographic, tenure, rent burden, and rent change criteria developed by The Urban Displacement Project of UC Berkeley and the University of Toronto. Figure 1E-3.31, Communities Sensitive to Displacement in Fresno, provides useful information indicating that large swaths of the City, including most South Fresno and Central Fresno neighborhoods, as well as the Blackstone Avenue Corridor are vulnerable to displacement, the AFH's displacement risk analysis falls short by failing to consider other relevant information relating to existing and potential housing cost pressures confronting low-income residents, residents of color, and other protected classes, as well as significant displacement risks associated with tenant protection limitations, City land use policies and practices, environmental hazards, and climate change. A complete displacement risk analysis must consider these and other relevant factors. *See* AFFH Guidance, pp. 40-43.

1. Displacements Risks Associated with Housing Cost Pressures

As mentioned above, the AFH's identification of sensitive communities using The Urban Displacement Project's criteria provides a helpful high-level view of the displacement pressures impacting most of the City of Fresno, and almost all South Fresno and Central Fresno neighborhoods. That mapping alone however is not sufficient to accurately describe displacement risks impacting residents associated with housing cost pressures.

First, the criteria used in the analysis rely on data from 2017 and earlier, including data relating to the change in rent between 2012 and 2017. This time period does not capture the sharp and sustained escalation in housing costs (both rental and ownership) that occurred during the COVID-19 pandemic between 2019 and 2022.[19] Between 2017 and 2021, Fresno experienced the greatest rent increases of all large U.S. cities, with rental prices increasing nearly 39% during that time.[20] Pandemic-era and ongoing housing price increases disproportionately impact the housing stability of renters, people of color, and other populations that have less disposable income and assets on average and are impacted by discrimina and sustained nature of the housing cost increases which have occurred in Fresno since 2017, the AFH's displacement risk analysis must be supplemented with and revised based on more recent data.

Second, while the AFH's displacement risk section provides a snapshot of neighborhoods vulnerable to increased housing costs that occurred between 2012 and 2017, the section does not actually discuss housing cost trends over time or analyze the factors driving increased housing costs across the City and certain neighborhoods. The use of census tract level data alone to determine whether an area qualifies as a "sensitive community" or not, without further discussion, also washes out unique vulnerabilities experienced by particular neighborhoods which comprise only a portion of a census tract. The City must supplement the displacement risk section to include this additional information and analysis, using available data and local knowledge, in order to meaningfully identify displacement risks associated with housing cost pressures and on particular neighborhoods and protected classes.

Several factors are likely or definitely associated with rising housing costs in Fresno which the AFH does not but must identify and evaluate for their impact on displacement risk. These include but are not limited to the following:

- The expiration of affordability covenants attached to Low-Income Housing Tax Credit financed properties during the Planning Period. According to the Draft Housing Element's At Risk Analysis, three properties consisting of 115 affordable units in the next four to eight years. The expiration of the affordability covenants on these properties creates a direct displacement risk to residents who are unable to pay market-rate rents.

[19] CalMatters, Real estate prices soar during the pandemic, climbing 25% in parts of California, Dec. 5, 2020, available at https://calmatters.org/california-divide/2020/12/real-estate-climb-pandemic/
[20] Los Angeles Times, The Nation's Hottest Housing Market? Surprise – it's Fresno, Mar. 31, 2021, available at https://www.latimes.com/homeless-housing/story/2021-03-31/fresno-rent-spike-taps-into-california-covid-housing-trends

- Major federal, state, and local investments in public works infrastructure projects in South Fresno neighborhoods, including a $250 million phased budget commitment for downtown revitalization in the 2023/2024 California State Budget[21]; the June 2023 Federal Railroad Administration and State High Speed Rail Authority $20 million award for the Fresno High-Speed Rail Station Historic Depot Renovation and Plaza Activation Project; and an $80 million July 2023 award from the State's Transit and Intercity Rail Program[22] for grade separation and intersection improvements in Central Fresno at McKinley Avenue and Blackstone Avenue. None of these historic awards have requirements attached to them to reduce the risk of displacement as a result of rising rents associated with neighborhood improvements.
- The development of the California High Speed Rail project, with a depot in Fresno, which the draft Housing Element recognizes is expected to increase housing demand in Fresno by enabling commuting between Fresno, Coastal California, and/or Sacramento. Draft Housing Element, p. 3-79. The analysis should also consider the impact of speculation associated with HSR on housing availability, prices, and displacement risk.
- The conversion of housing units to short-term rentals and their impact on housing cost pressures and displacement risk. The Draft Housing Element indicates that 7% of vacant units in the city are seasonal, short-term rentals, or "other" housing accommodations, but does not state what percentage of total units are seasonal housing or short-term rentals. The Draft states that stakeholders with Llaves De Tu Casa (an initiative involving real estate professionals, banks, the City of Fresno, and affordable housing developers) expressed concern about investors displacing community members to establish short-term rentals. Draft Housing Element, p. 1E-6-15. According to a recent news story, 811 homes were available as short-term rentals in Fresno and Clovis in June 2023, which represents a 27% increase in available rentals since 2020 and almost twice the number of homes listed for sale at that time.[23]

[21] YourCentralValley, City of Fresno announced $250 million for downtown, June 28, 2023, available at https://www.yourcentralvalley.com/news/local-news/city-of-fresno-announces-250-million-for-downtown/
[22] See Fresno Bee, State will help Fresno rebuild a major railroad crossing. Where is it, and what will it cost?, Jul. 6, 2023, available at https://www.fresnobee.com/news/local/article277074553.html
[23] GVWire, Is an Airbnb Crisis Looming in Fresno as Demand Plummets?, June 29, 2023, available at https://gvwire.com/2023/06/29/is-an-airbnb-crisis-looming-in-fresno-as-demand-plummets/

The AFH's discussion of City "Displacement Avoidance Efforts" does not remedy the need for a complete analysis addressing the displacement risk factors above, including relevant City policies and practices, and the adoption of meaningful actions to address those risks. That section describes certain planning efforts the City undertook to evaluate displacement risks from rising housing prices and consider, but it does not actually provide any information about the findings of that policy recommendations and the policies that the City did or did not adopt. Given the significant stakeholder engagement conducted for the development of the "Here to Stay Report," the AFH should incorporate and consider relevant information and policy recommendations contained in that report.

2. *Tenant Protection, Land Use, Environmental, and Climate-Related Displacement Risks Not Considered in the AFH Displacement Risk Analysis*

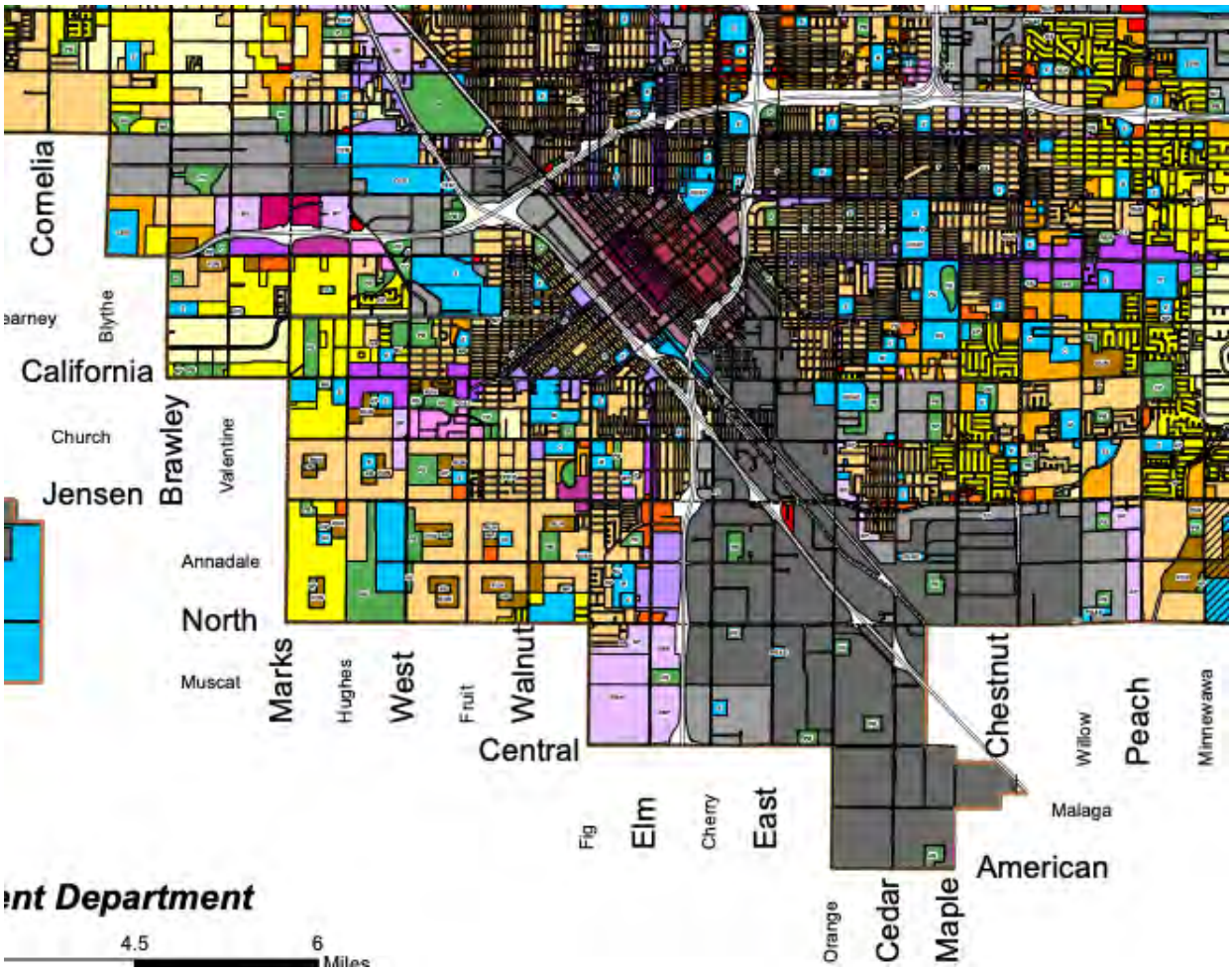
A complete analysis of displacement risks considers not only displacement risks associated with housing cost pressures, but also other factors which result in housing instability, including factors relating to the adequacy of tenant protections, disinvestment, local land use policies and practices, environmental hazards, and risks associated with natural disasters and climate change. The Draft Housing Element considers none of these risk categories, yet based on our direct work with tenants and low-income residents and residents of color, they represent real and significant risk factors for Fresno residents.

First, the Displacement Risk section does not address the adequacy of policies and resources to protect tenants from displacement as a result of eviction, harassment, and substandard housing. A coalition of residents and community-based organizations have called to the City's attention the need for and have repeatedly asked the City to adopt additional and stronger policies and programs to protect tenants, including in particular more comprehensive and stringent rent control standards than those established by the state, just cause requirements for eviction, and right to return home for displaced residents. And while the AFH mentions the City's code enforcement programs, it does not analyze how successful these programs have been in preventing tenant displacement and ensuring residents have a habitable space in which to live. Draft Housing Element, p. 3-79.

Second, while the Draft Housing Element recognizes the occurrence of historic disinvestment and describes recent initiatives to increase investment in South Fresno neighborhoods, the AFH does not but should consider the extent to which public and private disinvestment and unequal investment continues to impact low-income neighborhoods, neighborhoods of color, and neighborhoods with a high proportion of tenants and how

disinvestment perpetuates and/or increases displacement risk in these areas. *See* AFFH Guidance, p. 40. Yet even today, many South Fresno neighborhoods lack sidewalks, streetlights, park space, grocery stores and other public and private investments that contribute to neighborhood and housing-stability.

Third, the Draft Housing Element fails to consider the displacement risks associated with the City's land use and permitting decisions which have directed and continue to allow for and promote the concentration of industrial and waste management facilities in and around neighborhoods in Jane Addams, Southwest Fresno, South Central Fresno (referred to by the Draft Housing Element as the "South Industrial Area"), and Southeast Fresno. The City's General Plan land use map designates thousands of acres of land in these neighborhoods for industrial and business park uses, which encompass warehouse distribution facilities, agricultural processing operations (e.g., slaughterhouses, meat rendering facilities), chemical storage, landfills, waste transfer stations, biomass facilities, and more. Draft Housing Element, p. 1E-3-77. These designations are applied to land adjacent to land designated for and/or developed with residential neighborhoods as well land currently developed with housing. Several General Plan policies direct the City to expedite development on sites designated for industrial land uses by streamlining permitting and making sites "shovel ready" for new development through the installation of infrastructure and connection to services. City of Fresno General Plan, ED-1-d, ED-1-e, ED-1-j. ***The General Plan therefore envisions and plans for the conversion of existing housing and neighborhoods to industry*** and the continued proliferation of industrial land uses surrounding housing and other sensitive uses, both within existing City limits and within the City's Sphere of Influence.



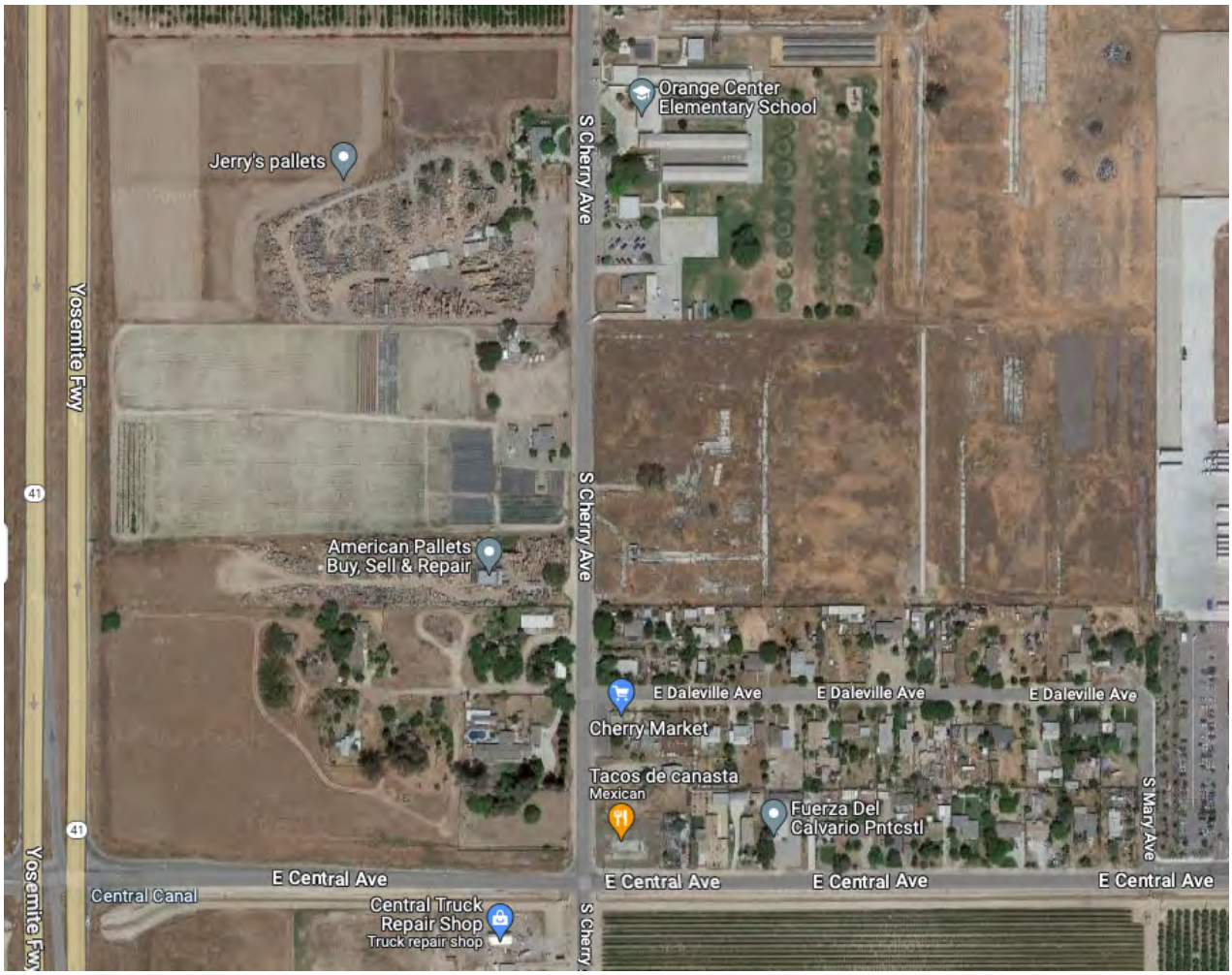
City of Fresno Official General Plan Land Use and Circulation Map (Excerpt)[24]

[24]Portion of City of Fresno Official General Plan Land Use and Circulation Map, available at https://www.fresno.gov/wp-content/uploads/2023/03/Official-General-Plan-Land-Use_20220411-1.pdf



Google Earth Image Depicting S Rose Ave. & E. Kaviland Ave Neighborhood, Zoned Industrial on General Plan Land Use Map, and Adjacent West Fresno

(captured 08/16/2023)



Google Earth Image of Unincorporated Daleville Neighborhood, Zoned Industrial on the General Plan Land Use Map, & Orange Center Elementary School



San Joaquin Estates Mobile Home Park ("MHP"), Villa Fresno MHP, and Fresno MHP, Adjacent to and/or Surrounded by Industrial Zoning on the General Plan Land Use Map

(captured 08/16/2023)

These new warehouse facilities, in combination with existing industrial facilities clustered in South Fresno neighborhoods, have severe negative and destabilizing impacts on nearby housing. Warehouse distribution facilities, such as the Amazon and Ulta Beauty warehouses in South Central Fresno, attract thousands of truck trips that travel on roads shared with homes, schools, and parks every day. This truck traffic creates toxic diesel air emissions, dust, vibration, noise, and light glare which negatively impacts residents in their homes, including their health and well-being, the longevity and potential future occupancy of their housing. The construction and operation of facilities themselves often creates excessive dust, noise, light glare, heat, odors, and other effects which have similar impacts on residents and housing quality and stability. We have attached to this comment letter a declaration from a South Central Fresno resident describing impacts she has experienced due to the proliferation of

industrial facilities in her neighborhood. Attachment A, Declaration of Katie Taylor.[25] The City must revise the AFH's Displacement Risk analysis to include a full evaluation of the impacts of its policies and practices relating to industrial development on displacement risks, including based on protected class status and income and reflecting the local knowledge of residents impacted by this issue, and incorporate meaningful actions to address those risks.

Fourth, the AFH's Displacement Risk section does not and should be revised to consider displacement risks associated with environmental hazards, environmental disasters, and climate change, pursuant to HCD's AFFH Guidance. AFFH Guidance, p. 42. For instance, South Fresno neighborhoods have been impacted by a series of fires at warehouse, recycling, and other industrial facilities that have occurred during the increasing number of high and extreme-heat days over the past five years.[26] Potentially toxic smoke from these fires has at times densely concentrated in South Fresno neighborhoods, which can make breathing difficult and unsafe for residents even within their homes with windows closed. In addition, residents who live in neighborhoods with incomplete sidewalks, stormwater drainage and other infrastructure and in housing without adequate cooling are at greater risk of displacement than other residents from climate-related weather events, including extreme heat and flooding. In Fresno, which recorded temperatures of 100 degrees Fahrenheit or higher on 23 days and a high temperature of 109 degrees in July 2023, extreme heat poses a serious threat of displacement for residents who lack adequate cooling in and/or cannot afford the cost of cooling their homes.

The City must revise the AFH to include a complete and accurate Displacement Risk analysis as described above and modify other sections of the Housing Element, including the AFHs contributing factors and meaningful actions to overcome disparities relating to access to a healthy environment associated with these land use patterns.

VI. The AFH Fails to Consider Significant Disparities in Access to Opportunity to Multi-Modal Transportation Options, a Healthy Environment, and Quality Education

[25] While the resident, Ms. Katie Taylor lives immediately outside of City of Fresno city limits, she resides within the City's Sphere of Influence and her experiences of the impacts of industrial development mirror those of many South Fresno residents who reside within the City of Fresno.

[26] See for example, ABC30, Crews Battling Large Fire at Southwest Fresno Recycling Center, June 18, 2021, available at https://abc30.com/fresno-fire-recycling-center-recylcing-timely/10807838/; KSEE24, Massive fire burns industrial building in Fresno. What made the battle difficult for firefighters, June 26, 2021, available at https://www.yourcentralvalley.com/news/local-news/massive-fire-breaks-out-at-warehouse-near-downtown-fresno/; ABC30, Flames break out at warehouse in Southeast Fresno with homes and businesses nearby," Apr. 3, 2023, available at https://abc30.com/warehouse-fire-southeast-fresno-east-and-florence-homeless-activity/13077246/

The AFH must include an analysis of disparities in access to opportunity. § 65583(c)(10)(A)(ii). Access to opportunity broadly encompasses the place-based characteristics which are linked to critical life outcomes, including "education, employment, economic development, safe and decent housing, low rates of violent crime, transportation, recreation, food, and a healthy environment (air, water, safety from environmental hazards, social services, and cultural institutions). AFFH Guidance, p. 34. The AFH fails to consider disparities relating to several key components of access to opportunity, including in particular disparities in access to multi-modal transportation opportunities, a healthy environment, and neighborhood investments – issues which residents and CBOs have long raised with the City.

A. Disparities in Access to Multi-Modal Transportation Opportunities

An analysis of access to transportation opportunities must, at minimum, compare concentrations of protected groups with access to transportation options; assess any disproportionate transportation needs for members of protected classes; and analyze combined housing and transportation cost impacts on protected groups. *Id.* at p. 35. Transportation options include personal vehicles and public transportation, as well as options for pedestrians and bicyclists and other forms of group or shared transportation. *See Id.* at 48, 69, 73.

The AFH's Transit Mobility analysis, as indicated by its title, focuses exclusively on the availability of public transit, including the FAX bus system and Handy Ride, through a brief discussion of available routes and programs and policies in place to reduce fares for certain populations. This analysis fails to compare access to transportation opportunities based on protected characteristics; assess any disproportionate transportation needs for members of protected classes; provide important information about the adequacy of public transportation service in different areas of the City, protected classes, and low-income households; and entirely fails to consider access to other forms of transportation, including walking and bicycling.

The City must revise the Draft Housing Element to include and analyze this missing information. In addition to the categories identified in the paragraph above, specific issues which must be considered include but are not limited to:

- Barriers to access to public transportation based on route limitations, especially for neighborhoods located on the fringes of the City. This includes both disadvantaged neighborhoods which are more strongly reliant on public transportation, such as Jane Addams and areas of West Fresno and South Central Fresno, and high resource neighborhoods in Northeast and Northwest Fresno, which Figure 1E-3.18, Fresno Area Express (FAX) indicates have significant less route access than South Fresno. The housing element must consider how route

limitations in these areas impact mobility of residents of disadvantaged communities and their access to various forms of opportunity as well mobility and housing opportunities for low-income residents in North Fresno, considering affordable housing subsidy scoring criteria which often prioritizes public transit accessibility.

- Barriers to mobility resulting from lengthy travel times for residents' using public transportation due to bus wait times, lack of direct routes, and route limitations requiring residents to use other forms of transportation to reach their first and last stop, especially for residents in fringe neighborhoods.
- Inadequate and/or absent infrastructure to facilitate safe and efficient active transportation, including but not limited to sidewalks, curbs, stormwater drainage, streetlights, crosswalks, and protected bike lanes.
- Inadequate and/or absent protection from extreme weather, including climate-related weather events, such as extreme heat and flooding, that impact walking, biking, and public transportation use. This includes but is not limited to the availability of shade (e.g., trees, structures), shelter, sidewalks, and stormwater drainage.
- The presence of high volumes of traffic, including heavy-duty truck traffic, on roadways used by pedestrians or bicyclists, including in and near areas zoned for industrial land uses and along designated truck routes.

B. Disparities in Access to a Healthy Environment

An analysis of access to a healthy environment must describe any disparities in access to environmentally healthy neighborhoods by protected groups, consider available statewide data such as CalEnviroScreen, evaluate consistency with the environmental justice element (if relevant), and discuss policies, practices, and investments that impact access to environmentally healthy neighborhoods. AFFH Guidance, p. 35. A complete analysis should consider any impacts on access to a healthy environment associated with the zoning, siting and operation of polluting or toxic land uses in disadvantaged communities and with climate change. *Id.* at pp. 16, 73. A robust analysis of disparities in access to a healthy environment, informed by public input, is especially important in Fresno given the high concentration of communities in low-income South Fresno neighborhoods of color that rank among the most burdened by multiple sources of pollution in the state and the relatively low-pollution burdens on many indicators born by comparatively affluent and Whiter North Fresno neighborhoods and RCAAs.

The AFH's Healthy Environment analysis includes data demonstrating cumulative pollution burdens impacting Fresno neighborhoods by census tract and provides some

information about industrial and waste processing facilities in South Fresno. However, it fails to include *any* discussion of City policies and practices underlying the stark environmental health disparities between South Fresno and North Fresno neighborhoods reflected in the data or any information or analysis about what policies, practices, and investment underlie those disparities. The analysis points to agricultural industry practices as a basis for high pollution indicator scores in Western Fresno County but does not discuss the bases for pollution disparities impacting the City of Fresno itself, including West Fresno, Jane Addams, South East Fresno neighborhoods with high cumulative pollution scores.

As discussed above, City policies and practices have intentionally concentrated polluting and noxious industrial and waste management land uses in South Fresno neighborhoods and policies and practices remain in place that all promote the exacerbation of these patterns to the detriment of housing opportunities and quality of life for South Fresno residents. These policies and practices include but are not limited to impact fees for a community benefit fund, public health impact reports, and cargo/freight prohibition and revenue tax.

C. Disparities in Access to Educational Opportunity

The AFH's analysis of educational opportunities must include an evaluation of the presence or lack of policies, practices, and investment to promote proficient schools or that contribute to a disparity in access to opportunity," among other factors. HCD's AFFH Guidance, p. 35. Disparities in access to transportation opportunities and environmental health, including those discussed above, significantly impact access to educational opportunity. For instance, a lack of or incomplete sidewalks, stormwater drainage, and streetlights in R/ECAPs; inefficient public transportation options; and the use of local roads by heavy-duty truck traffic may prevent students from traveling to and from school safely and on time, which may in turn have a series of impacts on students' access to educational opportunity. Likewise, the presence of heavy industrial facilities near and surrounding schools and ongoing construction for the development of new warehouse distribution centers may disrupt learning by exposing students to air, noise and light pollution and increasing temperatures and thereby also undermining opportunities for outdoor recreation during school hours. The City should also consider how policies, practices, and investments or disinvestments relating to access to green space, tree canopy, and climate resiliency (including adequate cooling and wildfire smoke protection) impact educational opportunities at schools, especially in low-income neighborhoods. The City must revise its analysis of educational opportunities to address these and other issues not addressed in the Draft Element and revise and add to its actions accordingly.

VII. Incomplete Analysis of Housing Element Sites' Compliance with AFFH Duty

Housing Element Law requires that jurisdictions' sites inventory "identify sites throughout the community" consistent with its duty to AFFH. § 65583.2; 8899.50; HCD AFFH Guidance, p. 45. The AFH must evaluate sites "relative to the full scope of the assessment of fair housing" and provide detailed instructions describing the required components of this evaluation. AFFH Guidance, p. 45.

Here, the AFH fails to evaluate important components of whether the distribution of sites in the inventory AFFH and to summarize conclusions and identify specific programs to address fair housing issues associated with the locations of those sites. Deficiencies of the evaluation include but are not limited to the following:

- The AFH's analysis of the sites inventory's impact on segregation and integration trends, like other sections of the AFH, only briefly considers impacts on the distribution of Hispanic/Latino households and does not consider at all the impact on relative integration and segregation of other races. Critically, it fails to acknowledge how the lack of lower-income sites identified in high-resource areas, including for example Northeast Fresno, will perpetuate patterns of RCAAs and R/ECAPs. *See* AFFH Guidance, p. 45.
- The AFH lacks analysis of the impact of its sites locations on access to specific forms of access to opportunity and therefore fails to identify any programs to address fair housing barriers to which its site selection gives rise. The sites inventory includes a large share of sites in low-income neighborhoods of color impacted by poor environmental health indicators, industrial zoning and concentrations of industrial and waste management facilities. The inventory also includes sites located near State Routes 99, 41, and 180 as well as many sites on Blackstone Avenue, a heavily trafficked thoroughfare. The City must analyze these and other impacts on access to a healthy environment implicated in its choice of sites. In addition, the AFH lacks analysis of how absent or incomplete infrastructure, services, and amenities impact access to opportunity on sites included in the inventory and fails to identify programs to address these barriers. The Draft Element includes a significant share of sites in areas West of State Route 99 which are not yet developed and which lack basic infrastructure, services, and amenities, such as sidewalks, streetlights, public transportation, park space, and grocery stores as well as City water and sewer connections. Many of the lower-income sites identified in low-income South Fresno neighborhoods also experience disparities in access to critical infrastructure and services which must be considered in an analysis.
- Only 23% of sites included in the inventory to meet the lower-income RHNA are in high and highest resource areas, which the AFH states is due to the predominance of single-family zoning north of Shaw Avenue. 1E-3-109. "Where the analysis of the

inventory indicates that the community has insufficient sites appropriately zoned and located to accommodate its lower-income RHNA in a manner that affirmatively further fair housing, the housing element must include a program to address this inconsistency, such as making additional sites available to accommodate its lower-income RHNA in a manner that affirmatively further fair housing." AFFH Guidance, p. 45. Despite its recognition of the limited number of lower-income inventory sites in high resource areas, the AFH fails to describe a program included in the Draft Element to adequately address this fair housing issue. As further discussed in this letter below, while the AFH points to Program 2 as the Draft Element's action to address this fair housing issue, the program fails to ensure that it will actually add sites to the inventory to meet the lower-income RHNA in high-resource areas or that it will facilitate development of lower-income housing in high-resource areas at all. The program commits only to "present potential sites or rezoning options for land in high resource areas for Council consideration for higher density development." p. 1E-18. While the time frame section indicates that City will rezone sites in high resource areas by 2027, the language in the body of the program does not make commit the City to actually rezoning sites or to include additional sites located in high-resource areas to the housing element and therefore renders the commitment that the Program is making ambiguous. The Program also makes no commitment to ensure that sites that may or may not be rezoned or impacted by this Program are "suitable" for development pursuant to the Housing Element Law's standards, including that increased capacity is created on vacant and/or underutilized sites. Further, the City provides no analysis justifying its selection of 750 units of additional capacity as its target or if that quantity is sufficient; if changes to permitting and zoning standards of sites located in the Office District will create sites near amenities and resources and with relatively low environmental burdens within high-resource census tracts; why rezoning of sites within low-density, higher income neighborhoods which are still under development is not proposed and that impact of the failure to include such sites on addressing patterns of segregation and exclusion. The Program also fails to address barriers to housing opportunity for lower-income residents who reside in housing developed in high resource areas, including inadequate public transportation options, affordable fresh food, and cultural and linguistic resources.

- The AFH sites inventory analysis includes no discussion of local knowledge and community input, pending development, development potential and other relevant factors which must be discussed in a complete analysis. AFFH Guidance, p. 45-46.

The City must address these deficiencies in the AFH's sites inventory analysis and include additional meaningful actions, with deadlines and clear outcomes, to overcome the fair housing issues associated with the Draft Element's inventory.

VIII. Failure to Fully Analyze Contributing Factors and Lack of Meaningful Actions to Affirmatively Further Fair Housing Render the Draft Housing Element Noncompliant.

The City has failed to complete an adequate analysis of factors that have contributed to patterns of segregation and as discussed above the program actions included in the draft housing element do not and will not effectively AFFH as required by law. Unless and until the City fully analyzes factors that have contributed to patterns of segregation, identifies which factors it will address along with the programs and policies it will rely on to do so and metrics that demonstrate success, the housing Element will be out of compliance with state mandates. (See Government Code section 65583(c)(10))

IX. Failure to Adopt Community Identified Programs That Will Result in A Beneficial Impact During the Planning Period and AFFH

Housing Element Law requires that housing elements include programs with a schedule of actions with timelines and specific commitments that will have a "beneficial impact" within the planning period to achieve the housing element's goals and objectives. As stated in the AFFH guidance "actions implement goals and consist of *concrete steps, timelines, and measurable outcomes.*" Pursuant to the requirement that housing elements AFFH, housing elements must also include actions to implement priorities and goals identified in an Assessment of Fair Housing (AFH). Those actions must be "meaningful" and go beyond combatting discrimination to "overcome patterns of segregation and foster inclusive, affordable and stable communities." AFFH Guidance, p. 46; *See* Government Code §§ 65583(c)(5)&(10, 8899.50(a)&(b).

The draft element's Housing Action Plan contains numerous actions that lack concrete steps and measurable outcomes and will not necessarily result in a beneficial impact during the planning period in violation of the Housing Element Law's standards. Certain programs fail to identify concrete steps, specific actions the city will take to complete each program, use of vague language, and do not provide adequate timelines. Finally, the action plan fails to include community identified programs and solutions collected from public hearings and workshops. Examples of inadequate programs, and some of our recommendations to improve them, include the following:

- **Program 1 - Maintain Adequate Sites.** Program 1 states that the City shall continue to maintain a current inventory of Housing Element sites to ensure that it can adequately accommodate the 2023-2031 RHNA" Given the impact of rezoning to the availability of and location of sites suitable for housing, the City should take additional steps to ensure transparency in decision-making related to proposed rezones and take diligent steps to provide notice of the proposed rezone along with an assessment of the potential impacts of the rezone on housing opportunity prior to a decision on the proposal. This includes but is not limited to public hearings and door to door canvassing to facilitate effective notice. Further, the city must conduct a racial equity analysis which would include the benefits and disadvantages of the proposed rezone and whether it would result in displacement of protected racial/ethnic groups, reduce housing opportunities for protected groups, and how it would impact patterns of segregation. Finally, the program should explicitly prohibit the rezoning of sites suitable for lower income households to industrial land use classifications which would bring industrial uses next to or near neighborhoods that include or are planned for housing affordable to lower income residents. This is critical to ensure that the City is compliant with its duty to affirmatively further fair housing.

- **Program 2- Variety of Housing Opportunities in High Resource Areas *(identified in the AFH as a Meaningful Action).***
  The program states that the City "will identify and pursue opportunities" with affordable housing developers to promote the development of affordable units in high resource areas. Unfortunately, it does not provide any details on how they will in fact promote the development of affordable units for lower income households in high opportunity areas. There is no clear commitment to zone sites for multi-family development in areas of high opportunity or a commitment to ensure that such units are affordable to all income levels. Further, there is no commitment to match funding opportunties with the identification of available sites to facilitate their development. Notably, the City will not conform with its duty to AFFH if it does not ensure adequate sites for affordable housing for lower income residents in high resource areas. Without clear and enforceable commitments and timelines, this program will not provide a beneficial impact or further fair housing. Furthermore, in order to expeditiously address the lack of housing opportunities accessible to lower-income residents in high resource areas, the timeline of this program should be shortened.

Accordingly, a specific objectives of this program should be changed to (a) assess the number of sites that must be rezoned in high resource areas (as identified in TCAC/ HCD's Opportunity Maps) to effectively AFFH , and (b) rezone the adequate number of sites pursuant to that analysis by December of 2025.

- **Program 3 - Encourage and Facilitate Accessory Dwelling Units (ADUs) (*identified in the AFH as a Meaningful Action)*.** While we support and encourage the development of ADUs, the program does not outline clear commitments that will yield identifiable beneficial outcomes. The program states "a primary objective of this program is to increase the supply of affordable units throughout the city" but fails to identify any specific commitments to take any action on how this objective will be reached. Additionally, building ADUs is generally not an accessible housing option to low income households who cannot afford predevelopment costs associated with ADUs. We recommend additional measures in this program to make ADUs accessible to lower income households such as targeted outreach to low-income homeowners, incentives for landlords to make ADUs affordable, no interest loans for ADU development and waivers for inspection fees Additionally, a dedicated liaison in the Office of Community Affairs should be available for all questions regarding ADUs.

- **Program 8 - Use of Sites in Previous Housing Elements.**. Program 8 should be updated to clarify that streamlined approval will be available to both vacant and non-vacant sites through a zoning amendment. As written it appears that the zoning amendment will only apply to vacant sites included in the 4th and 5th cycle housing elements.

- **Program 9 - Annual Reporting Program.** While we appreciate the sentiment that the City will "engage all members of the Fresno community," and the specific commitment to use multilingual notices and media, the City should revise this program and avoid using vague language with no commitments. To make the public engagement associated with this program meaningful, we recommend that the program include a commitment and associated timeframe for the City to implement input received through its various outreach efforts such as workshops and surveys in addition to the annual public hearing. The annual report should include specific actions the City will take to overcome identified constraints and barriers to complying with Housing Element programs.

- **Program 10 - Incentives for Housing Development (*identified in the AFH as a Meaningful Action)*.**This program does not present a commitment to address housing

production for low-income units or actions that will be taken to complete the program. To facilitate and promote the use of available incentives, the city should make a list of incentives, including density bonus incentives and impact fee waivers, available to the public through an accessible database.

Additionally, the program's current language that it will "identify site opportunities in higher resource areas and …improve access to resources" suffers from the same issues hat program 2 does insofar as it fails to identify clear and enforceable commitments and steps that it will take to ensure the availability of sites for lower income households in high opportunity areas. It is critical for this program's success and the City's role in AFFH that the housing element includes clear, timebound, and enforceable actions to ensure availability of sites for lower income households in high resource areas, as outlined above.

Finally, the City should include enforceable commitments to avoid displacement and gentrification in the Downtown Planning Area, and assess the role that priority processing in the area has on the City's duty to AFFH.

- **Program 11 - Local Housing Trust Fund (*identified in the AFH as a Meaningful Action)*.** The Local Housing Trust Fund is a great tool to alleviate the housing crisis and we are glad to see the City's commitment to leverage State matching funds. We recommend adding the creation of a Community Advisory Board as an action to ensure that projects are driven by a community process and benefit the most impacted residents. Housing advocates have met previously with City staff to develop an equitable Community Advisory Board made up of a diverse group of residents most impacted by housing barriers, legal experts, and small landlords.

- **Program 16 - Surplus Public Lands.** The commitment to release surplus sites appears to simply be a commitment to comply with its existing duties under the Surplus Lands Act. The language is ambiguous, non-committal and must be revised. In addition, the program states the City will "consider depositing a portion of up to 100 percent [of sale proceeds] to the LHTF" We recommend instead that the City commit to depositing 100 percent of sale proceeds into the LHTF.

- **Program 18 – Home Buyer Assistance (*identified in the AFH as a Meaningful Action)*.** While a critical program for many Fresnans, this Program should include

additional commitments to ensure that low-income residents, undocumented residents, residents who speak languages other than English, and residents in racially and /ethnically-concentrated areas of poverty (R/ECAPs) have the opportunity to benefit from these funds. During the 5th Cycle planning period, many residents without social security numbers or who faced language access barriers were unable to apply for the City's homebuyer assistance program. While the City was able to assist nine families with this program, this program must incorporate mechanisms that will allow more families to apply during the next 8-year cycle by addressing barriers and pursuing state funds every year. This program has other deficiencies that must be addressed such as lack of public outreach and lack of interpretation for applicants applying by phone. Solutions include: ensuring that low-income residents are knowledgeable about the programs, undocumented residents are able to successfully apply for this program, including closing costs as part of funding packages. In order to ensure that residents living in R/ECAPs are targeted, we recommend the City create annual reports listing how many applicants were assisted, outreach efforts made and whether they live in R/ECAPs. Due to the concerns outlined above, the program as currently implemented and drafted fails to adhere to HCD's AFFH Guidance that "actions must be specific with timelines, discrete steps and measurable outcomes to have a 'beneficial impact' during the planning period."

- **Program 19 – Housing Choice Voucher Incentive Program (HCV) (*identified in the AFH as a Meaningful Action)*.** This action fails to include meaningful actions with specific timelines, and measurable outcomes to have a "beneficial impact" during the planning period. The program should develop and implement a proactive enforcement program housed within that legal department to ensure HCV . The City should revise this program action to include a timeline of one workshop a month (twelve workshops throughout the year) to ensure residents and landlords are able to access housing quickly and better assist residents/landlords going through any issues that prevent them from using/accepting HCV. Additionally, collaborating with and funding CBOs and fair housing organizations to provide information to voucher holders and landlords on California's source of income discrimination prohibitions. The program should also commit the City of Fresno to finance billboard ads about protections against HCV discrimination and send informational materials to all landlords in Fresno registered in the rental registry regarding HCV. Finally, the program should be revised to include a commitment to actively pursue enforcement against discrimination against voucher-holders and supplementing vouchers with additional subsidies to support voucher use in higher-cost markets in high resource areas. Northeast Fresno has very

limited HCV use, with only four census tracts north of Herndon Avenue containing any HCVs, and of those four tracts, no tract exceeds 5 percent HCV use. By revising the program to include the above recommendations would help address fair housing needs in Fresno.

- **Program 21 – Housing Rehabilitation (*identified in the AFH as a Meaningful Action)*.** Government Code section 8899.50 requires "'meaningful actions" well beyond combating discrimination to overcome patterns of segregation and foster inclusive communities. These actions, as a whole, must address significant disparities in housing needs and in access to opportunity." The current program has failed to address the needs of extremely low income residents and vulnerable populations such as undocumented residents. As we continue to see the negative effects of Climate Change across the world, it is imperative that the City include weatherization such as cooling mechanisms, like heat pumps, air conditioning, insulation and other cooling assets to increase resilience to extreme heat as part of the rehabilitation program. It is a critical and urgent need given that extreme heat kills thousands per year and impacts disadvantaged communities the most. Additionally, the City must establish an acquisition and rehabilitation fund to purchase older, blighted, and/or abandoned homes/buildings. The City of Fresno can establish a revolving fund to insure that rehabilitated homes are sold back to the community at a low cost.Finally, for the program to have a beneficial impact the timeframe section should include 15 rehabilitation grants annually, and 5 distressed property grants using PLHA and CDBG funding for extremely low and low income residents.

- **Program 22 – Comprehensive Code Enforcement.** While we appreciate Code Enforcement's response and the City's diligence to keep increasing staff, there are still additional actions that should be taken to create a comprehensive code enforcement. HCD's AFFH Guidance recommends that "to overcome contributing factors to fair housing and affirmatively further fair housing, actions must consider a wide range of actions across all action areas. The number and scale of actions will depend on the severity of the needs but regardless of need, a cohesive and effective program will consider multiple action areas." This program as written continues to fail to address critical housing issues since the last housing element cycle. The program should be revised to include actions around legally holding landlords accountable for retaliation, unlawful evictions, and harassment towards tenants who file code enforcement complaints such as a commitment to adopt a tenant anti-harassment ordinance. As stated,

we recommend that the City adequately analyze code enforcement's procedures and incorporate tenant feedback for a comprehensive code enforcement program.

- **Program 23 - Special Needs Housing (*identified in the AFH as a Meaningful Action)*.** Much of the language in this program is vague, noncommittal, and does not provide adequate actions in order to provide a beneficial outcome. This program states the City "shall advocate for provision of special needs," "partner with and encourage local and state non profits," and "provide/encourage." These actions are not concrete or specific and provide no assurance of a beneficial impact on persons' with disabilities access to housing. This should be revised to include review and enforcement of compliance with legal requirements for accessibility of multi-family and affordable housing, including in permitting processes, not just "encourage[ing]" accessibility features. Additionally, we recommend that the program add specific actions to remove barriers to housing by special needs groups such as allowing undocumented residents to apply for and receive housing assistance, vouchers and other subsidies unless otherwise required by federal law.

- **Program 26 - Equitable Community Investments (*identified in the AFH as a Meaningful Action)*.** Program 26 states it will "seek funding," "continue to actively seek resources," and "continue implementing the written policies." These commitments are vague and non-committal. There are no actions on how these will be completed and is ambiguous and as a result provides no indication that a beneficial outcome will result from the program and further fair housing. The programs continue not to commit the City to take a lead role in planning, funding, and/or constructing projects or indeed any role beyond identifying issues and needs and seeking funding on an annual basis. Additionally, it should not rely on the General Plan's identification of Priority Areas for Development Incentives in Chapter 12 and should instead use the Urban Displacement Project data to guide investments.

- **Program 28 – Opportunity To Purchase Act (OPA) (*identified in the AFH as a Meaningful Action)*.** Although we appreciate the City's action to initiate research on a local Opportunity to Purchase Act, we strongly recommend that the City implements robust outreach and engagement, in partnership with CBOs that work closely with low-income communities in racially/ethnically-concentrated. Additionally, the program states it "shall research" and "consider establishing an OPA." These are not commitments

and fail to implement any specific, firm, or enforceable commitment such that no beneficial outcome of the action is indicated.

- **Program 29 – Mobile Home Parks (*identified in the AFH as a Meaningful Action)*.** Program 29 contains no commitments, actions, or enforceable language that will ensure a beneficial impact throughout the planning period. Additionally, this program repeats verbatim language included in Program 10A of the 2015-2023 without explaining how or why reliance on the same program action will have better results during the next planning period. With residents like Three Palms and Trails End Mobile Home Park experiencing the negative impacts of slumlords, it is crucial that the City make significant improvements to the program actions. Furthermore, the program must address the need for heat resiliency such as weatherization and insulation especially to older mobile home parks by funding a mobile home park renovation fund for all mobile homes. This fund will help low income families with issues that they need to address due to inspection violations or other habitability concerns. Additionally, this program should include a commitment to penalize and fine mobile home park owners who are not providing adequate and safe conditions for their tenants. For example, Three Palms Mobile Home Park had not had safe drinking water for quite some time and the owner was never made responsible for this clear human rights violation. Finally, consistent with the City's responsibility to AFFH, the program should support quality of life and access to opportunity improvements for all mobilehome parks in Fresno by taking meaningful actions to increase green space, transit, and resources near mobile home parks.

- **Program 30 – Emergency Rental Assistance Program (*identified in the AFH as a Meaningful Action)*.** Although we appreciate the City adding this program, it states that the City will "seek additional funding" and fails to commit ongoing funding that can come from the Local Housing Trust Fund, the General Fund, or its own permanent funding source to ensure a beneficial impact during the planning period. Identification and commitment of a permanent local source of funding by 2024 will highlight a commitment to prevent displacement and protect tenants.

- **Program 31 - Eviction Protection Program (EPP) (*identified in the AFH as a Meaningful Action)*.** The Eviction Protection Program is a critical anti-displacement and anti-homeless tool. However, the program's current language to "seek additional funding to support the "EPP" is not a strong commitment and does not provide indication that a beneficial outcome will occur if funding is not replenished. We strongly recommend that

the City commit to staffing 5 full-time staff for screening so tenants are able to receive help as soon as possible. We also recommend program expansion to include:

- Wide-reaching outreach and education campaigns
- Direct legal representation and assistance for low-income tenants encountering legal issues. This includes but is not limited to being served with a notice from their landlord (e.g. 3-day notice, notice of rent increase, etc.)
- Evaluation of the Eviction Protection Program to ensure it is effective and address issues to improve the program.

- **Program 33 – Homeless Assistance (*identified in the AFH as a Meaningful Action)*.** Program 33 does not commit the City to any concrete action. The program states it will "identify partnership opportunities," "leverage the homeless assistance response team" and "support the Voucher Incentive Program" none of which commit to any enforceable and actionable items. The city must commit to completing an adequate analysis of needs of unhoused City residents. This should include the completion of an AFH analysis of disproportionate needs.

- **Program 34 - At-Risk Housing.** Program 34 includes actions without a clear commitment to take steps that will lessen the severity or impact of the issue in any timeframe. Again, the language is non-commital, vague, and ambiguous in how the program will reach its objective. Additionally, stronger tenant protections should be included as an objective and completed no later than June 2024 for residents facing displacement and an affordable housing resource map for tenants so they have the option to relocate.

* * * * *

Thank you for your consideration of our comments. We look forward to discussing them with you and continuing to work with the state and the City to ensure that the City adopts a Housing Element that fully complies with the law and addresses the serious housing needs and disparities that impact Fresno City residents.

Sincerely,





Valerie Feldman
Staff Attorney
PILP

Karla Martinez
Policy Advocate
LCJA

CC: Hillary Prasad, Housing Policy Specialist, California Department of Housing and Community Development
Jose Ayala, Housing Policy Specialist, California Department of Housing and Community Development
Scott Lichtig, Deputy Attorney General, Bureau of Environmental Justice, Department of Justice
Robert Swanson, Deputy Attorney General, Bureau of Environmental Justice, Department of Justice

Attachment A:
Resident Katie Taylor's Declaration of Industrial Impacts

LEADERSHIP COUNSEL FOR JUSTICE & ACCOUNTABILITY

GOLDEN GATE UNIVERSITY SCHOOL OF LAW
ENVIRONMENTAL LAW AND JUSTICE CLINIC

DECLARATION OF KATIE TAYLOR IN SUPPORT OF SOUTH FRESNO COMMUNITY ALLIANCE'S COMMENTS ON THE CITY OF FRESNO'S GENERAL PLAN FINAL PROGRAMMATIC ENVIRONMENTAL IMPACT REPORT (SCH #2109050005)

I, Ms. Katie Taylor, declare:

1. I am a resident of Fresno, California. For over fifty years, I have lived on Central Avenue near its intersection with Orange Avenue in unincorporated Fresno County, just South of Fresno City limits.

2. The Amazon Fulfillment Center was constructed across the street from my house in 2017. The Ulta Beauty distribution center was built less than half a mile from my house in 2017 as well. There are other large facilities near my house, including the FedEx terminal, that attract traffic. Several other truck terminals and truck stops have been built around my neighborhood in the last few years as well. It seems like there are always new facilities being built nearby.

3. I was never notified that large warehouses were going to be built so close to me. When I saw the orchard trees being plowed down across the street, I did not know why. I thought the property owners were just going to plant more fruit trees. My neighbors thought the same thing. The next thing we knew there were big buildings being constructed. We were not given an opportunity to provide input on whether these projects went forward, the types of impacts they might have on the community, and what types of mitigation to avoid and reduce the projects' impacts might be appropriate. We were not given the opportunity for our voices to be heard.

4. I am not aware of the City ever contacting me or my family to inform us of the City's development of its current General Plan ("2014 General Plan"), the 2014 General Plan Master Environmental Impact Report, the Programmatic Environmental Impact Report for the 2014 General Plan, the Roosevelt Community Plan, or other action to zone or pre-zone land in my neighborhood for industrial land uses.

5. Three of my family members have passed away from cancer. My husband, daughter, and son all died of cancer. Some of my neighbors have died of cancer too. I have a heart condition and thyroid problems. I have allergies as well. My allergies have gotten worse since the warehouses were built. Some of my neighbors' children have asthma, which they say has gotten worse.

6. The construction of the Amazon facility had major impacts on me and my neighborhood. While construction was ongoing for months, the Amazon construction covered my house with dust. The construction occurred at night as well. The nighttime construction was loud and they used very bright lights. The truck traffic during the construction was also extremely loud,

and I could hear the noise from within my home with the windows shut. The construction caused vibrations that were so strong that my house shook on some occasions.

7. Since the Amazon and Ulta facilities began operating, the car and truck traffic in my neighborhood has increased significantly. People who come visit my house are shocked by how much traffic there is now. There is traffic traveling to the facilities 24 hours a day, seven days week. A loud rumbling from the trucks passing can be heard all hours of the day and night. The vibration from the trucks shakes my house. The trucks are so loud sometimes that it sounds like someone is knocking at my door, and it can sometimes be hard to hear visitors talking in my house when trucks pass by.

8. The trucks going to and from the facilities create a lot of dust and fumes, which covers my house and car constantly. I have to clean the dust off the windows of my house and car almost every day. The dust also seeps into my house through cracks in my doors and windows. My neighbors complain about the dust getting inside their houses too.

9. Traffic lights were put up at the intersection of Central and Orange when the Amazon warehouse was constructed. The lights are very bright and blink continuously. They shine into my windows, which disrupts my sleep. My daughter has Down syndrome and autism. The constant flashing of the traffic lights is very disturbing for her because of her condition.

10. I have noticed that my neighborhood has become hotter since the warehouses were constructed, including during the night. I am forced to use my air conditioning more, which increases my energy bill. My neighbors have also noticed that it is hotter, that the neighborhood does not seem to cool down as much in the evening as it used to, and that they have to use their air conditioners more.

11. I have noticed that the traffic from the warehouses affects pedestrians. People I know that walk around the neighborhood have to be very careful because of the traffic. Some of the Amazon employees drive recklessly. I have noticed more accidents because of the traffic from the warehouses. There is frequently congestion from employee vehicles backed onto Orange Avenue near my house.

12. The water pressure at my house has dropped in the last four or five years. I have to pay for a water tank that comes every two weeks. My water is contaminated. One of my family members tested the water and found that it was not safe to drink. A person from UC Davis came and tested my water too and told me not to drink it because of the contamination.

13. I am worried that the value of my house has gone down because of the warehouses and other facilities. I believe that the value of my neighbors' houses has gone down too. This really hurts us because we do not have very much money, my home is my main source of wealth, and we are trying to pass our homes down to our kids to help support them economically.

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14. Since about 2017, my neighbors and I have made many efforts to seek that the City stop approving new warehouses and industrial facilities in my neighborhood, that they notify us before studying and approving any new projects and allow us an opportunity to provide input, and that industrial developers and land owners respect these requests. When I and my neighbors have talked to the City and the developers, we tell them about the noise, dust, traffic, health problems, lowered property values, and other impacts from the warehouses and other projects. But they ignore us and keep building projects here without even notifying us first. It feels like we are not being heard. It feels like they are bullying us—like we are being targeted because of our race and because we do not have a lot of money.

15. The traffic, noise, dust, health, and other impacts from the facilities have caused me to suffer from a significant amount of stress and anxiety. For example, the abrupt loud noises and flashing lights are very unnerving and stressful. The heavy traffic from cars and trucks makes me constantly worry about my family's safety. My daughter has also said that she worries about the traffic, noise, and other impacts from the facilities.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration is executed on September 13, 2021, in Fresno, California.

Ms. Katie Taylor

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August 16, 2023

Mayor Jerry Dyer
Fresno City Councilmembers
Michelle Zumwalt, Planning and Development Department
2600 Fresno Street, Room Fresno, CA 93721

RE: City of Fresno Draft 6th Cycle Housing Element

Dear Councilmembers, Mayor Dyer, and Ms. Zumwalt,

The undersigned organizations write to you to advocate for a Housing Element that is equitable, inclusive, and responsive to disadvantaged communities' needs. We are a group of community-based organizations working alongside community partners and leaders throughout the City of Fresno. Housing Element Law requires that cities and counties make a diligent effort to meaningfully incorporate public input provided on the housing element update, prioritizing input provided by lower-income residents, residents with special housing needs, protected classes, and residents of lower-income and disadvantaged communities.

Goals, policies and actions must be aggressively set to overcome those contributing factors to meet the "meaningful impact" requirement in statute and to avoid actions that are materially inconsistent with the obligation to affirmatively further fair housing. Goals and policies must be created with the intention to have a significant impact, well beyond a continuation of past actions, and to provide direction and guidance for meaningful action. AFFH Guidance, p. 52. The draft element's Housing Action Plan contains numerous actions that lack concrete steps and measurable outcomes and will not necessarily result in a beneficial impact during the planning period in violation of the Housing Element Law's standards. The following programs are inadequate and include our recommendations to improve them.

- **Program 1 - Maintain Adequate Sites.** Program 1 states that the City shall continue to maintain a current inventory of Housing Element sites to ensure that it can adequately accommodate the 2023-2031 RHNA" Given the impact of rezoning to the availability of and location of sites suitable for housing, the City should take additional steps to ensure transparency in decision-making related to proposed rezones and take diligent steps to provide notice of the proposed rezone along with an assessment of the potential impacts of the rezone on housing opportunity prior to a decision on the proposal. This includes but is not limited to public hearings and door to door canvassing to facilitate effective

notice. Further, the city must conduct a racial equity analysis which would include the benefits and disadvantages of the proposed rezone and whether it would result in displacement of protected racial/ethnic groups, reduce housing opportunities for protected groups, and how it would impact patterns of segregation. Finally, the program should explicitly prohibit the rezoning of sites suitable for lower income households to industrial land use classifications which would bring industrial uses next to or near neighborhoods that include or are planned for housing affordable to lower income residents. This is critical to ensure that the City is compliant with its duty to affirmatively further fair housing.

- **Program 2- Variety of Housing Opportunities in High Resource Areas *(identified in the AFH as a Meaningful Action).***
  The program states that the City "will identify and pursue opportunities" with affordable housing developers to promote the development of affordable units in high resource areas. Unfortunately, it does not provide any details on how they will in fact promote the development of affordable units for lower income households in high opportunity areas. There is no clear commitment to zone sites for multi-family development in areas of high opportunity or a commitment to ensure that such units are affordable to all income levels. Further, there is no commitment to match funding opportunties with the identification of available sites to facilitate their development. Notably, the City will not conform with its duty to AFFH if it does not ensure adequate sites for affordable housing for lower income residents in high resource areas. Without clear and enforceable commitments and timelines, this program will not provide a beneficial impact or further fair housing. Furthermore, in order to expeditiously address the lack of housing opportunities accessible to lower-income residents in high resource areas, the timeline of this program should be shortened.

  Accordingly, a specific objectives of this program should be changed to (a) assess the number of sites that must be rezoned in high resource areas (as identified in TCAC/ HCD's Opportunity Maps) to effectively AFFH , and (b) rezone the adequate number of sites pursuant to that analysis by December of 2025.

- **Program 3 - Encourage and Facilitate Accessory Dwelling Units (ADUs) (*identified in the AFH as a Meaningful Action)*.** While we support and encourage the development of ADUs, the program does not outline clear commitments that will yield identifiable beneficial outcomes. The program states "a primary objective of this program is to increase the supply of affordable units throughout the city" but fails to identify any

specific commitments to take any action on how this objective will be reached. Additionally, building ADUs is generally not an accessible housing option to low income households who cannot afford predevelopment costs associated with ADUs. We recommend additional measures in this program to make ADUs accessible to lower income households such as targeted outreach to low-income homeowners, incentives for landlords to make ADUs affordable, no interest loans for ADU development and waivers for inspection fees Additionally, a dedicated liaison in the Office of Community Affairs should be available for all questions regarding ADUs.

- **Program 8 - Use of Sites in Previous Housing Elements.**. Program 8 should be updated to clarify that streamlined approval will be available to both vacant and non-vacant sites through a zoning amendment. As written it appears that the zoning amendment will only apply to vacant sites included in the 4th and 5th cycle housing elements.

- **Program 9 - Annual Reporting Program.** While we appreciate the sentiment that the City will "engage all members of the Fresno community," and the specific commitment to use multilingual notices and media, the City should revise this program and avoid using vague language with no commitments. To make the public engagement associated with this program meaningful, we recommend that the program include a commitment and associated timeframe for the City to implement input received through its various outreach efforts such as workshops and surveys in addition to the annual public hearing. The annual report should include specific actions the City will take to overcome identified constraints and barriers to complying with Housing Element programs.

- **Program 10 - Incentives for Housing Development (*identified in the AFH as a Meaningful Action)*.**This program does not present a commitment to address housing production for low-income units or actions that will be taken to complete the program. To facilitate and promote the use of available incentives, the city should make a list of incentives, including density bonus incentives and impact fee waivers, available to the public through an accessible database.

  Additionally, the program's current language that it will "identify site opportunities in higher resource areas and …improve access to resources" suffers from the same issues hat program 2 does insofar as it fails to identify clear and enforceable commitments and steps that it will take to ensure the availability of sites for lower income households in high opportunity areas. It is critical for this program's success and the City's role in AFFH that the housing element includes clear, timebound, and enforceable actions to

ensure availability of sites for lower income households in high resource areas, as outlined above.

Finally, the City should include enforceable commitments to avoid displacement and gentrification in the Downtown Planning Area, and assess the role that priority processing in the area has on the City's duty to AFFH.

- **Program 11 - Local Housing Trust Fund (*identified in the AFH as a Meaningful Action)*.** The Local Housing Trust Fund is a great tool to alleviate the housing crisis and we are glad to see the City's commitment to leverage State matching funds. We recommend adding the creation of a Community Advisory Board as an action to ensure that projects are driven by a community process and benefit the most impacted residents. Housing advocates have met previously with City staff to develop an equitable Community Advisory Board made up of a diverse group of residents most impacted by housing barriers, legal experts, and small landlords.

- **Program 16 - Surplus Public Lands.** The commitment to release surplus sites appears to simply be a commitment to comply with its existing duties under the Surplus Lands Act. The language is ambiguous, non-committal and must be revised. In addition, the program states the City will "consider depositing a portion of up to 100 percent [of sale proceeds] to the LHTF" We recommend instead that the City commit to depositing 100 percent of sale proceeds into the LHTF.

- **Program 18 – Home Buyer Assistance (*identified in the AFH as a Meaningful Action)*.** While a critical program for many Fresnans, this Program should include additional commitments to ensure that low-income residents, undocumented residents, residents who speak languages other than English, and residents in racially and /ethnically-concentrated areas of poverty (R/ECAPs) have the opportunity to benefit from these funds. During the 5th Cycle planning period, many residents without social security numbers or who faced language access barriers were unable to apply for the City's homebuyer assistance program. While the City was able to assist nine families with this program, this program must incorporate mechanisms that will allow more families to apply during the next 8-year cycle by addressing barriers and pursuing state funds every year. This program has other deficiencies that must be addressed such as lack of public outreach and lack of interpretation for applicants applying by phone. Solutions include: ensuring that low-income residents are knowledgeable about the programs, undocumented residents are able to successfully apply for this program, including closing

costs as part of funding packages. In order to ensure that residents living in R/ECAPs are targeted, we recommend the City create annual reports listing how many applicants were assisted, outreach efforts made and whether they live in R/ECAPs. Due to the concerns outlined above, the program as currently implemented and drafted fails to adhere to HCD's AFFH Guidance that "actions must be specific with timelines, discrete steps and measurable outcomes to have a 'beneficial impact' during the planning period."

- **Program 19 – Housing Choice Voucher Incentive Program (HCV) (*identified in the AFH as a Meaningful Action)*.** This action fails to include meaningful actions with specific timelines, and measurable outcomes to have a "beneficial impact" during the planning period. The program should develop and implement a proactive enforcement program housed within that legal department to ensure HCV . The City should revise this program action to include a timeline of one workshop a month (twelve workshops throughout the year) to ensure residents and landlords are able to access housing quickly and better assist residents/landlords going through any issues that prevent them from using/accepting HCV. Additionally, collaborating with and funding CBOs and fair housing organizations to provide information to voucher holders and landlords on California's source of income discrimination prohibitions. The program should also commit the City of Fresno to finance billboard ads about protections against HCV discrimination and send informational materials to all landlords in Fresno registered in the rental registry regarding HCV. Finally, the program should be revised to include a commitment to actively pursue enforcement against discrimination against voucher-holders and supplementing vouchers with additional subsidies to support voucher use in higher-cost markets in high resource areas. Northeast Fresno has very limited HCV use, with only four census tracts north of Herndon Avenue containing any HCVs, and of those four tracts, no tract exceeds 5 percent HCV use. By revising the program to include the above recommendations would help address fair housing needs in Fresno.

- **Program 21 – Housing Rehabilitation (*identified in the AFH as a Meaningful Action)*.** Government Code section 8899.50 requires "'meaningful actions" well beyond combating discrimination to overcome patterns of segregation and foster inclusive communities. These actions, as a whole, must address significant disparities in housing needs and in access to opportunity." The current program has failed to address the needs of extremely low income residents and vulnerable populations such as undocumented residents. As we continue to see the negative effects of Climate Change across the world, it is imperative that the City include weatherization such as cooling mechanisms, like

heat pumps, air conditioning, insulation and other cooling assets to increase resilience to extreme heat as part of the rehabilitation program. It is a critical and urgent need given that extreme heat kills thousands per year and impacts disadvantaged communities the most. Additionally, the City must establish an acquisition and rehabilitation fund to purchase older, blighted, and/or abandoned homes/buildings. The City of Fresno can establish a revolving fund to insure that rehabilitated homes are sold back to the community at a low cost.Finally, for the program to have a beneficial impact the timeframe section should include 15 rehabilitation grants annually, and 5 distressed property grants using PLHA and CDBG funding for extremely low and low income residents.

- **Program 22 – Comprehensive Code Enforcement.** While we appreciate Code Enforcement's response and the City's diligence to keep increasing staff, there are still additional actions that should be taken to create a comprehensive code enforcement. HCD's AFFH Guidance recommends that "to overcome contributing factors to fair housing and affirmatively further fair housing, actions must consider a wide range of actions across all action areas. The number and scale of actions will depend on the severity of the needs but regardless of need, a cohesive and effective program will consider multiple action areas." This program as written continues to fail to address critical housing issues since the last housing element cycle. The program should be revised to include actions around legally holding landlords accountable for retaliation, unlawful evictions, and harassment towards tenants who file code enforcement complaints such as a commitment to adopt a tenant anti-harassment ordinance. As stated, we recommend that the City adequately analyze code enforcement's procedures and incorporate tenant feedback for a comprehensive code enforcement program.

- **Program 23 - Special Needs Housing (*identified in the AFH as a Meaningful Action)*.** Much of the language in this program is vague, noncommittal, and does not provide adequate actions in order to provide a beneficial outcome. This program states the City "shall advocate for provision of special needs," "partner with and encourage local and state non profits," and "provide/encourage." These actions are not concrete or specific and provide no assurance of a beneficial impact on persons' with disabilities access to housing. This should be revised to include review and enforcement of compliance with legal requirements for accessibility of multi-family and affordable housing, including in permitting processes, not just "encourage[ing]" accessibility features. Additionally, we recommend that the program add specific actions to remove barriers to housing by special needs groups such as allowing undocumented residents to apply for and receive

housing assistance, vouchers and other subsidies unless otherwise required by federal law.

- **Program 26 - Equitable Community Investments (*identified in the AFH as a Meaningful Action).*** Program 26 states it will "seek funding," "continue to actively seek resources," and "continue implementing the written policies." These commitments are vague and non-committal. There are no actions on how these will be completed and is ambiguous and as a result provides no indication that a beneficial outcome will result from the program and further fair housing. The programs continue not to commit the City to take a lead role in planning, funding, and/or constructing projects or indeed any role beyond identifying issues and needs and seeking funding on an annual basis. Additionally, it should not rely on the General Plan's identification of Priority Areas for Development Incentives in Chapter 12 and should instead use the Urban Displacement Project data to guide investments.

- **Program 28 – Opportunity To Purchase Act (OPA) (*identified in the AFH as a Meaningful Action).*** Although we appreciate the City's action to initiate research on a local Opportunity to Purchase Act, we strongly recommend that the City implements robust outreach and engagement, in partnership with CBOs that work closely with low-income communities in racially/ethnically-concentrated. Additionally, the program states it "shall research" and "consider establishing an OPA." These are not commitments and fail to implement any specific, firm, or enforceable commitment such that no beneficial outcome of the action is indicated.

- **Program 29 – Mobile Home Parks (*identified in the AFH as a Meaningful Action).*** Program 29 contains no commitments, actions, or enforceable language that will ensure a beneficial impact throughout the planning period. Additionally, this program repeats verbatim language included in Program 10A of the 2015-2023 without explaining how or why reliance on the same program action will have better results during the next planning period. With residents like Three Palms and Trails End Mobile Home Park experiencing the negative impacts of slumlords, it is crucial that the City make significant improvements to the program actions. Furthermore, the program must address the need for heat resiliency such as weatherization and insulation especially to older mobile home parks by funding a mobile home park renovation fund for all mobile homes. This fund will help low income families with issues that they need to address due to inspection violations or other habitability concerns. Additionally, this program should include a commitment to penalize and fine mobile home park owners who are not providing

adequate and safe conditions for their tenants. For example, Three Palms Mobile Home Park had not had safe drinking water for quite some time and the owner was never made responsible for this clear human rights violation. Finally, consistent with the City's responsibility to AFFH, the program should support quality of life and access to opportunity improvements for all mobilehome parks in Fresno by taking meaningful actions to increase green space, transit, and resources near mobile home parks.

- **Program 30 – Emergency Rental Assistance Program (*identified in the AFH as a Meaningful Action).*** Although we appreciate the City adding this program, it states that the City will "seek additional funding" and fails to commit ongoing funding that can come from the Local Housing Trust Fund, the General Fund, or its own permanent funding source to ensure a beneficial impact during the planning period. Identification and commitment of a permanent local source of funding by 2024 will highlight a commitment to prevent displacement and protect tenants.

- **Program 31 - Eviction Protection Program (EPP) (*identified in the AFH as a Meaningful Action).*** The Eviction Protection Program is a critical anti-displacement and anti-homeless tool. However, the program's current language to "seek additional funding to support the "EPP" is not a strong commitment and does not provide indication that a beneficial outcome will occur if funding is not replenished. We strongly recommend that the City commit to staffing 5 full-time staff for screening so tenants are able to receive help as soon as possible. We also recommend program expansion to include:
    - Wide-reaching outreach and education campaigns
    - Direct legal representation and assistance for low-income tenants encountering legal issues. This includes but is not limited to being served with a notice from their landlord (e.g. 3-day notice, notice of rent increase, etc.)
    - Evaluation of the Eviction Protection Program to ensure it is effective and address issues to improve the program.

- **Program 33 – Homeless Assistance (*identified in the AFH as a Meaningful Action).*** Program 33 does not commit the City to any concrete action. The program states it will "identify partnership opportunities," "leverage the homeless assistance response team" and "support the Voucher Incentive Program" none of which commit to any enforceable and actionable items. The city must commit to completing an adequate analysis of needs of unhoused City residents. This should include the completion of an AFH analysis of disproportionate needs.

- **Program 34 - At-Risk Housing.** Program 34 includes actions without a clear commitment to take steps that will lessen the severity or impact of the issue in any timeframe. Again, the language is non-commital, vague, and ambiguous in how the program will reach its objective. Additionally, stronger tenant protections should be included as an objective and completed no later than June 2024 for residents facing displacement and an affordable housing resource map for tenants so they have the option to relocate.

Additionally, the draft element lacks policies and programs identified in Leadership Counsel's February 2023 letter, attached hereto. We incorporate the policies and programs recommended in that letter here by reference. In addition to the policies and programs highlighted in Leadership Counsel's February 2023 letter, the draft element should also be revised to include the following programs:

A. Rent Control and Just Cause Protection Ordinance. The Housing Element draft mentions tenant protection "strategies" but in no way does the draft commit to tangible solutions. City of Fresno tenants, along with advocates, have been demanding rent control and just cause ordinance since 2021. The Here To Stay Report lists this as the communities' top priorities. Tenants have attended City Council meetings for the past two years asking for this; they have met with every city council member; and have lifted this as a priority in the City's Housing Element workshops. Yet, the City refuses to acknowledge residents' need. We strongly recommend that the City incorporate this into the Housing Element.
B. Inclusionary Zoning Ordinance. The City should adopt a program to develop and adopt an inclusionary zoning ordinance by a date certain that is no more than three years into the planning period in order to allow the ordinance to result in the production of lower-income units during the planning period. To ensure that the ordinance AFFH and maximizes the production of affordable units, the ordinance should apply to single-family and multi-family housing and require a minimum share of affordable units (approx. 25-30%) and affordability levels of those units, including affordability for very-low and extremely-low income households. The City should develop this ordinance in partnership with lower-income residents and CBOs.
C. Urban Greening is used as buffer zones when residential is placed or already placed near existing polluting land uses to mitigate health impacts.
D. Citing industrial uses. Programs should explicitly prohibit the rezoning of sites suitable for lower income households to industrial land use classifications which would bring industrial uses next to or near neighborhoods that include or are

planned for housing affordable to lower income residents. This is critical to ensure that the City is compliant with its duty to affirmatively further fair housing.

E. Impact fees should be placed into a community benefit fund when polluting land uses and practices are placed near housing. The community benefit fund will be managed by the community directly impacted to dictate to who these funds should be allocated.
F. Establish local hire provisions requiring that a certain percentage of workers reside within 10 miles or less of a Project Site. This can reduce the length of trips, reduce greenhouse gas emissions and provide localized economic benefits
G. Developing Public Health Impact Reports for new development in order to understand existing public health disparities and the potential of those conditions worsening as a result of development. Public health agencies should be resourced to support this analysis. The findings of these reports should be available publicly and be included in permit approval processes and other key decision-making milestones.
H. Establish a Cargo/Freight Prohibition and Revenue Tax to directly fund community-based housing and projects in the neighborhoods most negatively impacted by years of environmental toxicity caused by freight.
I. Incorporate Complete Streets principles into all transportation projects at all phases of development, including planning and land use decisions, scoping, design, implementation, maintenance, and performance monitoring.
J. Establish a Housing Element Implementation Committee to oversee the timelines and implementation of each program and policy. The committee should be composed primarily by tenants, low-income homeowners, and at-risk populations to ensure implementation meets the needs of most at-risk communities.

As discussed previously, each program must contain clear action steps, deadlines, and measurable outcomes that will be achieved within the planning period and address housing and fair housing needs prioritized during the public process.

* * * * *

Thank you for your consideration of our comments. Please contact us if you would like to find a time to discuss them. We look forward to working together to advance access to safe, affordable housing for all City of Fresno residents.

Sincerely,
Karla Martinez, Policy Advocate
Leadership Counsel for Justice and Accountability

Edith Rico, Project Director
Building Healthy Communities

Shar Thompson, Central Valley Regional Coordinator
Tenants Together

Marisa Moraza, Campaign Director
Power California

DATE: August 16, 2023

TO: Michelle Zumwalt, Sophia Pagoulatos- City of Fresno

FROM: Scott Miller, President/ CEO

RE: Multi-Jurisdictional Housing Element (2023 – 2031) Appendix 1-E Fresno

On behalf of our board and membership, sincere thanks for the opportunity to provide feedback on this important document. Our chamber recognizes the importance of fostering a balanced and sustainable housing landscape that not only supports the growing needs of our community but also respects the rights and interests of property owners. We appreciate the efforts made to address housing challenges within the county, and we strongly support the administration's One Fresno Housing Plan in general. Simply put, we believe all of us in Central California should do what we can to aggressively increase the supply of housing and remove the obstacles to getting it done quickly and affordably.

With that in mind, we will continue to focus on the following:

1. **Transparent, market driven solutions with measurable outcomes:** We commend the plan for creating new expedited permissions for ADUs, encouraging creative financing strategies and meaningful expansion of public-private partnerships. By implementing measures that encourage affordable housing without burdening developers or property owners, we can stimulate growth while ensuring housing remains within reach for residents of various economic backgrounds. We hope to see even more incentives such as density bonuses and increases in tax relief for favorable projects moving forward.
2. **Reduce impediments:** We applaud the steps taken by programs 5 and 20 in the draft plan and encourage more. To foster a thriving housing ecosystem, we will always advocate locally and at the State level for streamlined regulatory processes that expedite development without compromising safety and quality. We'd like to see the plan go further to create regulatory exemptions for the development of affordable housing.
3. **Respecting Property Owner Rights:** As a matter of principle, we generally oppose rezoning of private property without the consent of the property owner. We ask that language be included in Program 1 (and other sections as appropriate) specifically discouraging forced rezoning except as a last resort in implementation of the RHNA.
4. **Reconsideration of the Opportunity to Purchase Act:** We think this program (28) could have potential pitfalls. While we'd encourage local nonprofit organizations to own and develop housing in partnership with the City, we recommend removal (or clarification) of the language that implies possible intervention in private sales to create a de facto first right of refusal scenario.

Since 1885, our Chamber has been committed to the idea that collaboration and creativity are keys to a prosperous Fresno County. We are eager to actively engage in discussions and offer our insights to ensure that the final Housing Element reflects the best interests of our diverse community. As always, we're grateful for the opportunity to provide feedback and appreciate the positive working relationship.

Scott Miller

August 16th, 2023

Michelle Zumwalt
Planning and Development Department, City of Fresno,
2600 Fresno Street, Room 3065, Fresno, CA 93721

On behalf of the California Apartment Association (CAA), I extend CAA's support for the Fresno County Multi-Jurisdictional Housing Element Update as currently written. The Housing Element update's core goals and proposed policies reflect the importance and urgency of developing housing across Fresno County that is affordable and available to families of all income levels. CAA looks forward to working with all jurisdictions in successfully implementing this plan's goals.

CAA participated in many of the workshops during the public outreach period and appreciates that many of the goals and policies referenced in the latest Housing Element draft reflect the input of the community and underscore the importance of building the homes our community needs.

The first goal, with good reason, is new housing development. All Fresno County jurisdictions need to significantly increase housing units over the next eight years, and this is especially true in the extremely low, very low, and low economic segments. (Policy 1.2) This cannot be achieved without the rapid implementation of Policy 1.4, which addresses minimizing unnecessary development costs which add to the costs of housing production. Additionally, incentivizing infill housing development, along with promoting higher-density housing, mixed use zoning, and TOD development will significantly add to housing supply while reducing VMT and aligning with the goals set forth in AB 32.

Goal 2 relates specifically to affordable housing, and we believe all aspects should be implemented as soon as practicable. CAA is happy to work with the county and cities in sharing best practices from around the state to ensure the policy goals are adopted quickly and as seamlessly as possible. The need for these initiatives is particularly crucial in Fresno County, which has a significant number of economically-challenged households as discussed in the demographic section of the Housing Element Update. CAA is currently working with Fresno Housing to host a series of webinars regarding accepting Housing Choice Vouchers (Policy 2.2) as we have done in many other cities and counties throughout California. Our experience has been that once rental housing providers understand the program, and the benefits of accepting Housing Choice Vouchers, HCV reach is significantly expanded.

Goal 3, Improving and maintaining the quality of housing and residential neighborhoods is another area of emphasis for CAA. (Policies 3.3 and 3.4) Our organization was a key stakeholder in the developing and implementing the Anti-Slum Enforcement Team (ASET) and the Rental Housing Improvement Act (RHIA). CAA continues to work with the City of Fresno through the Neighborhood Revitalization Team and the School Area Team to ensure all rental housing providers, CAA members and non-members alike, abide by and embrace these programs. We welcome the opportunity to work with other jurisdictions as well.

Goal 5, Fair and Equal Housing Opportunities, reflects a core element of CAA's mission. CAA offers meetings and webinars throughout the year, to ensure rental housing providers are educated on federal, state, and local laws and to allow our members to be reminded of these laws as well as any changes in the preceding year. CAA has worked in Fresno, and throughout the state, in conjunction with local governments educating rental housing providers on the importance of all Fair Housing laws. CAA aims to be a partner with all cities in the region to help educate housing providers and their residents on their rights and responsibilities under applicable laws.

CAA appreciates the work Fresno County, the incorporated cities of Fresno County, and the Council of Governments have done on this Housing Element update. CAA looks forward to working with all stakeholders in the passage and implementation of the Multi-Jurisdictional Housing Element as currently presented.

Sincerely,

Greg Terzakis
Senior Vice President

California Apartment Association
980 Ninth Street, Suite 1430
Sacramento, CA 95814
(800) 967-4222 • caanet.org

The **California Apartment Association** is the largest statewide rental housing trade association in the country, representing over 50,000 rental housing providers offering over 1 million rental homes statewide.

EQUAL HOUSING OPPORTUNITY

August 16, 2023

Michelle Zumwalt
Planning and Development Department
City of Fresno
2600 Fresno Street, Room 3065
Fresno, CA 93721

Dear Ms. Zumwalt;

On behalf of the more than 4,500 members of the Fresno Association of REALTORS® (F.A.R), I am writing to express support for the Fresno County Multi-Jurisdictional Housing Element Update as currently written. The Update's core goals and policies address the importance and urgency in developing and increasing housing supply in Fresno County. F.A.R looks forward to working with our coalition partners and all jurisdictions in successfully implementing this Update.

California is witnessing a historic housing shortage. While this is universally recognized, there is less agreement about how to define and measure it, or even what makes the shortage so intense. Many factors have applied acute pressure in the housing market amid the general shortage conditions. There are many consequences for those living within Fresno County and no one is likely exempt from the effects of this crisis.

F.A.R. participated in several of the workshops during the public outreach period and would like to emphasize and extend support for the following goals and policies referenced in the latest Housing Element draft.

The first goal is new housing development, and we cannot emphasize this particular goal enough. All jurisdictions within the Element need to significantly increase housing stock over the next eight years, and this is especially true in the extremely low, very low, and low economic segments. (Policy 1.2) This cannot be achieved without the rapid implementation of Policy 1.4, which addresses minimizing unnecessary development costs which adds to the costs of housing production. Additionally, incentivizing infill housing development, along with promoting higher-density housing, mixed use zoning, and TOD development with significantly add to housing supply while reducing VMT and aligning with the goals set forth in AB 32.

Goal 2 specifically addresses affordable housing, and we are in support of implementing all aspects as soon as practicable. F.A.R. intends to work closely with our coalition partners, such as the California Apartment Association (CAA) to share and support best practices to ensure public policy goals are achieved as quickly as possible. We understand that the need for these initiatives is particularly crucial in Fresno County, which has a significant number of economically challenged households as indicated in the demographic section of the Housing Element Update.

Goal 3, Improving and maintaining the quality of housing and residential neighborhoods is another area of importance and emphasis for F.A.R. (Policies 3.3 and 3.4)

Goal 5, Fair and Equal Housing Opportunities, Real estate professionals and consumers depend on strong fair housing laws and practices for our communities and economy to thrive. Discrimination distorts the housing market and closes the door on the American dream of homeownership for qualified buyers. At F.A.R., we advance our commitment to fair housing through policy advocacy, innovative programming, and legal guidance. F.A.R. promotes public policy to advance broader homeownership availability, accessibility, and affordability in all communities. We prioritize efforts to narrow homeownership gaps among demographic groups and promote strong enforcement of anti-discrimination laws in the housing market. F.A.R. promotes awareness, education and understanding to advance fair housing in the industry.

F.A.R. commends the work Fresno County, the incorporated cities of Fresno County, and the Council of Governments have done on this Housing Element update. Further, we would like to thank Mayor Dyer and his One Fresno Plan for his leadership, vision, and practical strategy to address the housing crisis we face today and, in the years to come. F.A.R. looks forward to working with all stakeholders in the passage and implementation of the Multi-Jurisdictional Housing Element as currently written.

Thank you for the opportunity to provide our feedback and we thank you for your leadership.

Sincerely,

Brian Domingos

Brian Domingos, President
Fresno Association of REALTORS®

EMAIL TO: housingelement@fresno.gov BY AUGUST 15TH!
SUBJECT: MJHE Plan 2 and PLAN 3

The following are my reasons for opposing Plans 2 and 3:

1- Your MJHE Plan is a Plan which takes a law passed in Sacramento to address the issues of homelessness and housing shortages and arrives at "A SACRAMENTO SOLUTION".

Homelessness & housing shortages are conditions that WE IN THIS NEIGHBORHOOD did NOT create!

2. ***ADU's (Plan 2)***- Most of us chose this neighborhood BECAUSE it is zoned "Single-Family Residential". AARP cites that "ADUs change the character of a neighborhood and cause problems for a community that was NOT BUILT for higher density". We SAVED to buy our homes in this lower density neighborhood!

3. Your "Masterpiece Plan" presents a VERY ONE-SIDED VIEW of ADUs. It emphasizes "Make an income/extra money. House extra family or caregivers." Shame on you for not providing FULL DISCLOSURE of the downside to ADUs to any and all interested parties!

4. In reviewing professional, expert opinions, we are advised "DO NOT COUNT ON ADU INCOME TO LIVE ON… due to the frequent jurisdictional changes [for rentals] that occur''. (Think Covid- property owners were unable to evict for non-payment, unable to collect rent owed, owners are limited to a "Sacramento-fixed" percentage of raising rent depending on how many rentals they owned- just to identify a few issues.)

5. Your Plan states placing ADUs in single-family neighborhoods with higher median incomes is to "facilitate housing mobility opportunities for lower-income households…" (Pg 1E-4-17).

This is nothing more than a "Calif Social Experiment"!

Your Plan has no mention of:

6. … the costs and responsibilities involved in rental units that eat into passive rent income. Yet you highlight income...

7. … how extra POLICE or FIRE PROTECTION will be provided at a time when our Mayor and Chiefs of Police & Fire are desperate for recruits to fill CURRENT vacancies. Then there are CITY RENTAL INSPECTIONS!

8. … details like parked cars crowding our streets, about how adding mailboxes or garbage cans will be determined, the disruption to the privacy of neighbors and those in the main home w/ADU renters coming or going.

9. ... about a home that is already a rental. Can the property owner simply ADD an ADU if the current renter objects?

10. ***Low-Income Housing (Plan 3)-*** Fresno's low-income housing is poorly kept. I OBJECT to what becomes eyesores in my neighborhood!

11. Building low-income, multi-family units in our neighborhood- in your "Infill Opportunity Zones" or ANY "rezoned" property- again brings up the issue of A LACK OF police and fire personnel.

12. In the *Wall Street Journal*, 8/8/23, front page HEADLINES- "*Apartment Landlords Face Peril As Their Debt Costs Skyrocket*". Talk about housing that will be falling apart, will be unattended, and become *OUR NEIGHBORHOOD'S PROBLEM*…

13. Incorporating your Plans 2 & 3 into NEW areas of building homes- NOT IN EXISTING SINGLE-FAMILY, LOW-DENSITY NEIGHBORHOODS- is where these plans need to be enacted. Home buyers will KNOW what they're getting, they'll KNOW what the residential components will be/are, and these buyers will have 100% awareness of the decision they make to buy in such a neighborhood. It is CRUEL to inflict these misguided plans on our neighborhoods!

14. HERE'S TWO IDEAS-

A- CONTINUE the outstanding efforts to remodel and repurpose the motels and inns that have fallen into disrepair or been abandoned and use these for low-income/homeless opportunities.

B- Bring in the "NECESSARY RESOURCES" to these sites.

Thank you

Joseph Gugliemo

Rachel Gugliemo

Concerned Resident's

From: [redacted]>
Sent: Friday, August 11, 2023 11:48 AM
To: HousingElement <HousingElement@fresno.gov>
Subject: MJHE Plan 2 & 3

External Email: Use caution with links and attachments

The following are my reasons for opposing Plans 2 and 3:

1- Your MJHE Plan is a Plan which takes a law passed in Sacramento to address the issues of
homelessness and housing shortages and arrives at “A SACRAMENTO SOLUTION”. Homelessness camps; housing shortages are conditions that WE IN THIS NEIGHBORHOOD did NOT
create!

2. ADU’s (Plan 2)- Most of us chose this neighborhood BECAUSE it is zoned “Single-Family
Residential”. AARP cites that “ADUs change the character of a neighborhood and cause problems for a community that was NOT BUILT for higher density”. We SAVED to buy our
homes in this lower density neighborhood! Nobody, gave us a handout! We created our neighborhood on our own.

3. Your “Masterpiece Plan” presents a VERY ONE-SIDED VIEW of ADUs. It emphasizes “Make an
income/extra money. House extra family or caregivers.” Shame on you for not providing FULL
DISCLOSURE of the downside to ADUs to any and all interested parties!

4. In reviewing professional, expert opinions, we are advised “DO NOT COUNT ON ADU INCOME
TO LIVE ON… due to the frequent jurisdictional changes [for rentals] that occur. (Think Covid-
property owners were unable to evict for non-payment, unable to collect rent owed, owners
are limited to a “Sacramento-fixed” percentage of raising rent depending on how many rentals
they owned- just to identify a few issues.)

5. Your Plan states placing ADUs in single-family neighborhoods with higher median incomes is

to “facilitate housing mobility opportunities for lower-income households…” (Pg 1E-4-17).
This is nothing more than a “Calif Social Experiment!"

Your Plan has no mention of:
6. … the costs and responsibilities involved in rental units that eat into passive rent income. Yet
you highlight income...
7. … how extra POLICE or FIRE PROTECTION will be provided at a time when our Mayor and
Chiefs of Police & Fire are desperate for recruits to fill CURRENT vacancies. Then there are CITY
RENTAL INSPECTIONS!
8. … details like parked cars crowding our streets, about how adding mailboxes or garbage
cans will be determined, the disruption to the privacy of neighbors and those in the main home
w/ADU renters coming or going.
9. ... about a home that is already a rental. Can the property owner simply ADD an ADU if the
current renter objects?

10. Low-Income Housing (Plan 3)- Fresno’s low-income housing is poorly kept. I OBJECT to what
becomes eyesores in my neighborhood! Excessive trash litter the streets, yards not kept up, etc.

11. Building low-income, multi-family units in our neighborhood- in your “Infill Opportunity
Zones” or ANY "rezoned" property- again brings up the issue of A LACK OF police and fire
personnel.

12. In the Wall Street Journal, 8/8/23, front page HEADLINES- “Apartment Landlords Face Peril
As Their Debt Costs Skyrocket”. Talk about housing that will be falling apart, will be unattended,
and become OUR NEIGHBORHOOD’S PROBLEM…

13. Incorporating your Plans 2 & 3 into NEW areas of building homes- NOT IN EXISTING SINGLE-
FAMILY, LOW-DENSITY NEIGHBORHOODS- is where these plans need to be enacted. Home
buyers will KNOW what they're getting, they'll KNOW what the residential components will

be/are, and these buyers will have 100% awareness of the decision they make to buy in such a
neighborhood. It is CRUEL to inflict these misguided plans on our neighborhoods!

14. HERE'S TWO IDEAS-
A- CONTINUE the outstanding efforts to remodel and repurpose the motels and inns that
have fallen into disrepair or been abandoned and use these for low-income/homeless opportunities.
B- Bring in the "NECESSARY RESOURCES" to these sites.

Thank you,
Dennis Statham
559-779-4779

From: Sarah A <[redacted]>
Sent: Wednesday, August 09, 2023 11:16 AM
To: HousingElement <HousingElement@fresno.gov>; Sophia Pagoulatos <Sophia.Pagoulatos@fresno.gov>; Veronica Martinez <Veronica.Martinez@fresno.gov>; Michelle Zumwalt <Michelle.Zumwalt@fresno.gov>
Cc: Sarah A <[redacted]>
Subject: Following up about Multi-Jurisdictional Housing in our Fresno 93711 bluff area

External Email: Use caution with links and attachments

To: M.Zumwalt, Room 3065, Planning & Development Department

Dear Planning department representatives,
Thank you, thank you for all the good work you do. I know it's difficult dealing with NIMBYism and you remained perfectly calm. Thank you for listening to my concerns.
I've copied the note I sent to our District 2 Councilman, mostly due to my lack of time to repeat it. Please consider my comments. In addition to the comments below, I'm in support of the new and restorative planning within City limits, as opposed to urban sprawl and leapfrog development. Maybe design/infrastructure committees exist to give Developers advice/boundaries on building attractive, green, sustainable communities that will add long-term value to our beautiful city. And wouldn't it be great to have more shady green spaces and urban farms throughout Fresno?
Please let me know if there is anyway I can help your efforts here. Thank you in advance for all you do!

Sarah Adams
[redacted]

Dear Councilman Karbassi,
I attended the jurisdictional housing meeting last night at Nelson Elementary. The planning department staff had a challenging time giving an overview of the City's projects last night. The residents in the Bluff area seemed most concerned about the large piece of land at east end of Alluvial Ave; as well, the lot at SW corner of Van Ness and Alluvial; and in general, the trauma and de-valuation of neighborhood properties that could happen to the existing established high-end homes in our area, IF flanked by super dense apartment style housing or a high-travelled Alluvial Ave somehow connecting to Palm....

Some residents in the room also expressed concern about parking issues related to ADU additions. It seems to me ADUs might fit better on larger lots, minimum of 1/2 acre, with mandatory off-street parking planned/enforced, to avoid congestion concerns.

Also, by keeping Alluvial blocked on the East end, the high-end neighborhood would be preserved, and not opened up to through-traffic, or wandering transient folks. .....

Maybe there was some consensus last night (?) that high density, MEDIUM-INCOME housing could fit into NEW undeveloped areas, as opposed to existing areas.

Also, it seems there was some approval of less-dense density, and housing FOR SALE instead of for RENT. If there are individual homeowners, there is shared long term interest and responsibility for the neighborhood. Other comments included the need for thoughtful open space planning, landscaping, infrastructure, pedestrian and bike pathways.....

On a personal note, I walked around the large lot east of Alluvial Ave this morning--maybe 40 acres?--which is zoned for office buildings apparently. Why is this not zoned for medium-income, dense, townhouse 2-story housing with green space, paths to the ParkPlace shopping center with gym, cafes, restaurants? These businesses would be patronized by local community and there would be less turnover. As well, having access to the river on existing paths and views, is a super extension of the San Joaquin River Parkway and Conservation Trust's mission. This would allow home buying opportunities for young professionals, families, and retired; therefore, creating diversity. There is even a private pre-school in the neighborhood and Nelson elementary school not far away.

If I were looking for new community housing, more affordable, as a working person, I'd be interested in this north Fresno location! It sounds like the City doesn't need more office buildings in the area, due to plenty of existing office space....so why not use this acreage to build a wonderful dense townhouse development, and to keep existing Bluff residents to its west happy, don't connect Alluvial. It appears that it could easily be accessed off Palm.

We hope you can consider and support these ideas.
Best wishes,

Sarah J. Adams
tel. 760/937-6581

From: Mike C. <[redacted]>
Sent: Wednesday, August 09, 2023 7:54 AM
To: HousingElement <HousingElement@fresno.gov>
Subject: #Program

External Email: Use caution with links and attachments

Program(s)are effective but there's not enough of them. and the ones that there are, are only for families.. There are single people that need just as much help as people that have families..
Wish I had a program now.
#needone

Sent from Yahoo Mail on Android

From: Lynette S. <[redacted]>
Sent: Wednesday, August 09, 2023 1:06 PM
To: HousingElement <HousingElement@fresno.gov>
Subject: MJHA PLAN 2 and Plan 3

External Email: Use caution with links and attachments

I attended last night's meeting at Nelson Elementary. I would like to emphatically "go on the record" as being in opposition to Plan 2 (ADUs) and Plan 3 (multi-family, low income housing)!

I am a life-long Fresno County resident and have resided the past 31 years at my current address- 7264 N Brooks Ave, Fresno, 93711 (Herndon/West/Alluvial).

The following are my reasons for opposing Plans 2 and 3:
1- Your MJHE Plan- this is a Plan which takes a law passed in Sacramento to address the issues of homelessness and housing shortages and arrives at "A SACRAMENTO SOLUTION". **(Homelessness & housing shortages are conditions that WE IN THIS NEIGHBORHOOD did NOT create!)**
2. ***ADU's (Plan 2)***- Most of us chose this neighborhood BECAUSE it is zoned "Single-Family Residential". AARP cites that "ADUs change the character of a neighborhood and cause problems for a community that was NOT BUILT for higher density". We SAVED to buy our homes in a lower density neighborhood!
3. Your "Masterpiece Plan" presents a VERY ONE-SIDED VIEW of ADUs. It emphasizes "Make an income/extra money. House extra family or caregivers." Shame On You for not providing FULL DISCLOSURE of the downside to ADUs!

4. Reviewing professional, expert opinions, we are advised "DO NOT COUNT ON ADU INCOME TO LIVE ON… due to the frequent jurisdictional changes [for rentals] that occur''. (Think Covid-property owners wereunable to evict for non-payment, unable to collect rent owed, owners are limited to a "Sacramento-fixed" percentage of raising rent depending on how many rentals they owned.)

5. Your Plan states placing ADUs in single-family neighborhoods with higher median incomes is to "facilitate housing mobility opportunities for lower-income households…" (Pg 1E-4-17). This is nothing more than a "Calif Social Experiment"!

Your Plan has no mention of:

6. … the costs and responsibilities involved in rental units that eat into passive rent income. Yet you hilight income...

7. … how extra POLICE or FIRE PROTECTION will be provided at a time when our Mayor and Chiefs of Police & Fire are desperate for recruits to fill CURRENT vacancies. Then there are CITY RENTAL INSPECTIONS!

8. … details like parked cars crowding our streets, about how adding mailboxes or garbage cans will be determined, the disruption to the privacy of neighbors and those in the main home w/ADU renters coming or going.

9. ... about a home that is already a rental. Can the property owner simply ADD an ADU if the current renter objects?

10. ***Low-Income Housing (Plan 3)-*** Fresno's low-income housing is poorly kept. I OBJECT to what becomes eyesores in my neighborhood!

11. Building low-income, multi-family units in our neighborhood- in your "Infill Opportunity Zones" or ANY "rezoned" property- again brings up the issue of A LACK OF police and fire personnel.

12. WSJ, 8/8/23, Front Page HEADLINES- "*Apartment Landlords Face Peril As Their Debt Costs Skyrocket*". Talk about housing that will be falling apart, will be unattended, and become *OUR NEIGHBORHOOD'S PROBLEM*…

13. Incorporating your Plans 2 & 3 into NEW areas of building homes- NOT IN EXISTING SINGLE-FAMILY, LOW DENSITY NEIGHBORHOODS- is where these plans need to be enacted. Home buyers will KNOW what they're getting, they'll KNOW what the residential components will be/are, and will have 100% awareness of the decision they make to buy in such a neighborhood. It is CRUEL to inflict these misguided plans on our neighborhoods!

14. HERE'S TWO IDEAS-

A- CONTINUE the outstanding efforts to remodel and repurpose the motels and inns that have fallen into disrepair or been abandoned as housing solutions for the low-income and homeless populations. B- Increase "NECESSARY RESOURCES" in those areas!

Thank you,

Lynette Statham, LCSW
559.284.7092

CARPENTERS 701
FRESNO, CALIFORNIA
United Brotherhood of Carpenters & Joiners of America

August 9, 2023

Via Email: housingelement@fresno.gov,;
michelle.zumwalt@fresno.gov

Planning and Development Department,
City of Fresno,
2600 Fresno Street, Room 3065,
Fresno, CA 93721
(559) 313-9735 or

ATTN: Michelle Zumwalt, Architect,
Re: 6th Cycle Housing Element Update (2023-2031)

Dear Michelle Zumwalt

Please accept these comments on the above referenced Housing Element Update on behalf of the members of Carpenters Local 701, which represents working men and women in the City of Fresno. Local 701 has long been at the forefront of training the next generation of construction workers, opening pathways to the industry for diverse and traditionally underserved populations, and embracing new technologies and delivery methods to expedite the construction of much needed housing.

We appreciate the opportunity and look forward to working together on this important endeavor.

To meet the urgent need for housing units outlined in the State's Regional Housing Needs Allocation (RHNA), as well as the policy goals outlined in the City of Fresno Housing Element, it is vital that the City of Fresno support efforts to build the local construction workforce. **However, the City of** Fresno **current housing element draft fails to address a major impediment to housing production that other cities have acknowledged and committed to addressing in their own, now-finalized housing elements.** Namely, neither **Fresno County** nor the City of Fresno have enough skilled, highly productive residential construction workers to build the nearly 36,866 units that the City of Fresno is supposed to produce over an 8 year time period.

1361 N. Hulbert, Fresno, California 93728 • Phone: (559) 268-3895 • Fax: (559) 268-2004

As part of the 6th Cycle Housing Element process, the City of Fresno must seek to build 36,866 units over an eight year period. However, as the housing crisis in our communities has continued to deteriorate in recent years, **the number of workers employed in residential building construction in Fresno has actually decreased by 10% since 2007.**[1] A continuously shrinking residential construction workforce cannot build 36,866 units of housing in 8 years. As such, **the City should commit to developing local residential construction labor policy in its Housing Element.** This policy should seek to alleviate the labor shortage impediment to housing in the City by investing in the development and retention of workers in the local residential construction labor supply.

To support the policy goals of the Housing Element, Local 701 is therefore requesting that the City add local hire and apprenticeship requirements to the General Plan and Housing Element for all residential construction projects larger than 10 units. The standards Local 701 is proposing in this comment letter would help to ensure greater benefits for the broader community, help ensure that construction labor needs are met, and guarantee that new residential development projects within the City are making needed investments in the region's skilled construction industry workforce.

The City Should Bar Issuance of Building Permits Unless Each Future Residential Development of 10 units or Above has a Viable Apprenticeship Program and Local Hiring Requirements

The Carpenters propose the following additions to the Municipal Code of the City of Fresno for any residential project larger than 10 units

Permitting requirements in the Municipal Code of the City of Fresno.

> A person, firm, corporation, or other entity applying for a building permit under the relevant section of the Municipal Code of the City of Fresno, California shall be required to comply with the apprenticeship, healthcare, and local hire requirements of the Housing Element and General Plan. Failure to comply with the requirements set forth in this section shall be deemed a violation of this article.

Apprenticeship:

> For every apprenticeable craft, each general contractor and each subcontractor (at every tier for the project) will sign a certified statement under penalty of perjury that it participates in a Joint Apprenticeship Program Approved by the State of California, Division of Apprenticeship Standards **OR** in an apprenticeship program approved by the State of California Division of Apprenticeship Standards that has a graduation rate of 50% or higher and has graduated at least thirty (30) apprentices each consecutive year for the five (5) years immediately preceding submission of the pre-

[1] QCEW data: Difference between YEAR2007 employment (3482) and YEAR 2022 (3121) in Private NAICS 2361 Residential building construction for All establishment sizes in Fresno, California, NSA.

qualification documents. The contractor or subcontractor will also maintain at least the ratio of apprentices required by California Labor Code section 1777.5.

Local Hire Policy:

> Contractor will be required to provide documentation that the contractor will hire a minimum of twenty-five percent (25%) of staff for any job classification with more than four (4) employees employed whose primary residence, which is not a post office box, is, and has been, within Fresno county within 180 days of the expected date of issuance of the Notice to Proceed for the project.

As part of making these proposals, Local 701 wishes to make the City of Fresno **aware that other cities in the wider region have incorporated language into their finalized housing elements that does commit to the development of residential construction labor policy:**

Cities including Redwood City, Menlo Park, and Foster City, example, have included the following language as part of the policy goals in their respective housing elements:

> **Adopted Housing Element policy goal (Redwood City and Menlo Park):**
>
> "Encourage developers and contractors to evaluate hiring local labor, hiring from or contributing to apprenticeship programs, increasing resources for labor compliance, and providing living wages."[2]
>
> **Adopted Housing Element policy goal (Foster City):**
>
> "**Encourage Local Hiring.** Encourage developers and contractors to evaluate hiring local labor, hiring from, or contributing to apprenticeship programs, increasing resources for labor compliance, and providing living wages.
>
> **Local Labor Program List.** Establish and post a list of local labor unions and apprenticeship programs on City's website and encourage the developers and contractors to hire local labor. Responsible Agency: Community Development Department, City Attorney Timeframe: Establish the list by December 2023. Bi-annually update the list or upon requests from the local unions to be added to the list."[3]

At a minimum, Local 701 strongly calls on the City of Fresno **to incorporate a similar commitment to develop residential labor policy in their own housing element.** This will help alleviate a major impediment to housing production: the labor shortage crisis in the residential construction.

---

[2] See, page 322: City of Menlo Park 2023-31 Housing Element. Available at city-of-menlo-park-2023-2031-housing-element.pdf (menlopark.gov)
See, page 52: City of Redwood City 2023-31 Housing Element. Available at REDWOOD-CITY-HE-ADOPTED-2-13-23.pdf (welcomehomerwc.org)

[3] See, page 82: City of Foster City 2023-31 Housing Element. Available at https://engagefostercity.org/housing-element

In addition to the above examples, **other cities have also identified the utility of new legislative tools such as AB 2011,**[4] which both streamlines housing production while also raising labor standards for local workers. The Carpenters encourage the City of Fresno to also make use of and lead in taking advantage of the opportunity presented by such legislative developments.

While there has been a remarkable economic expansion in Fresno in recent years, rising inequality and displacement adds to the City's affordability crisis and threatens to undermine the region's strong economy. Local 701 has a strong track record of developing many programs that will enable the City to meet the General Plan and Housing Element goals. These programs include a robust Joint Apprenticeship Training Committee, vigorous utilization of apprentices in the City of Fresno, healthcare coverage for all members and their families, and innovation within the construction industry.

Joint Apprenticeship Training Committees (JATC's), such as the Carpenters Training Committee for Northern California (CTCNC), are a proven method of career training built around a strong partnership between employers, training programs and the government. This tripartite system is financially beneficial not only for the apprentice, but is a major benefit for the employer and the overall economy of the City of Fresno. The CTCNC monitors current market conditions and adjusts the workflow of apprentices to meet the needs of the community, heading off any shortage of skilled workers. History has demonstrated that strong utilization of apprentices throughout the private sector helped California builders produce millions of units of housing.

CTCNC recruitment strategies include robust diversity and inclusionary outreach programs, such as pre-apprenticeship, with proven results in representative workplaces and strong local economies. It is imperative that our underserved populations have supportive and effective pathways to viable construction careers, while ensuring that employers are able to find and develop the best and brightest talent needed to thrive in a competitive economy.

Employer-paid health insurance plans for our members and their families provides preventative services to stay healthy and prevent serious illness. Timely care reduces the fiscal burden for our members and their families, and significantly reduces the utilization of safety-net programs administered by the City of Fresno and Fresno.

Embracing new technologies and delivery systems will have a significant impact on the construction industry, particularly the residential sector. Increasing housing delivery methods reduces project durations and provides City of Fresno residents housing sooner. Local 701 is at the forefront of ensuring that new construction technologies deliver those benefits while also creating work opportunities for those already in the trades as well as those looking to begin a construction career.

Local 701 is in a unique position to address many of the key ideas outline in the City of Fresno Housing Element Update. By investing in the training and utilization of apprentices, performing

[4] See, page 28: County of Santa Cruz 2023-31 Housing Element. Available at 2023 Housing Element (sccoplanning.com)

outreach to ensure that the workforce closely mirrors the demographics of our local community, providing employer-paid healthcare for our members and their families, and promoting innovation in the residential construction sector, Local 701 is prepared to assist in closing the affordability gap in the City of Fresno and Fresno area. We look forward to engaging City staff and elected leaders as the Housing Element moves forward and working cooperatively to bridge the needs of the City with the skills and tools of Local 701.

Sincerely,

Jayson Martinez

Senior Field Representative

Carpenters Local 701



From: Valarie Armstrong <varmstrong@cysfresno.org>
Sent: Tuesday, August 08, 2023 9:59 AM
To: HousingElement <HousingElement@fresno.gov>
Subject: Multi_Jurisdictional Housing Element Public Comment

External Email: Use caution with links and attachments

City planning and ordinances need to adopt special caveats for tiny homes. Lenders need to be encouraged to provide longer term loans.

Tiny homes ($80-160K) and RV park model homes ($59-120k) are less expensive to build and maintain and yield a reduced environmental impact.

Tiny home communities foster a stronger sense of community and belonging. Providing affordable options in a housing market that has outpaced wages.

If a committed developer could create tiny home subdivisions on smaller plots of land, the options to reduce carbon footprints and still maintain affordable purchase prices are endless.

Thank you

Valarie Armstrong
Human Resources Director
Comprehensive Youth Services of Fresno Inc.
4545 N. West Ave.
Fresno CA 93705

(559) 229-3561 xt122 | Direct (559) 230-6322 | Fax (559) 229-3681
www.cysfresno.org | varmstrong@cysfresno.org

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From: Martha Gonzalez <[redacted]>
Sent: Tuesday, August 08, 2023 10:44 AM
To: HousingElement <HousingElement@fresno.gov>
Subject: The City need to do more for homeless people. I had call and left several messages about a homeless couple living next to our property for over a year and nothing has been done by the City. They have 2 poor dogs tied up all day and the smell is terribl...

External Email: Use caution with links and attachments

-----Original Message-----
From: Patrick C. <[redacted]>
Sent: Tuesday, August 08, 2023 12:34 PM
To: HousingElement <HousingElement@fresno.gov>
Subject: Public comment for housing element

External Email: Use caution with links and attachments

[redacted] I understand that the housing element is basically a number report to the State. And agree more affordable housing in different styles is needed around the City.

However, one strategy I feel is missing in this report is the deliberate planning that's needed to build a community with services that are needed within walking distance that would include medical, food, public transit and green space to help clean the air and provide space for play and exercise. City planners have called them catalytic corridors in meetings I've attended. I think there needs to be a goal to work collaboratively with parks, arts commission, public works. the Planning commission should not be allowed to make changes to a well thought out plan just because a developer asks. There needs to be a moratorium on changes.
Thank you

Sent from my iPhone

From: Vanesa Donangtavanh <vanesad@selfhelpenterprises.org>
Sent: Monday, July 31, 2023 9:11 AM
To: Betsy McGovern-Garcia <betsyg@selfhelpenterprises.org>; Sophia Pagoulatos <Sophia.Pagoulatos@fresno.gov>
Cc: Michelle Zumwalt <Michelle.Zumwalt@fresno.gov>; HousingElement <HousingElement@fresno.gov>
Subject: RE: City of Fresno Housing Element Public Draft Available

External Email: Use caution with links and attachments

Good morning Sophia,

Following up on this item. Is there anything else we need to do on our end to get this issue addressed in the Housing Element?

Thanks,
Vanesa

VANESA DONANGTAVANH
PROJECT MANAGER
Self-Help Enterprises

8445 W. Elowin Court
P.O. Box 6520
Visalia, CA 93290

559-931-2479 Office
559-651-3634 Fax:
vanesad@selfhelpenterprises.org
Http://www.selfhelpenterprises.org



From: Betsy McGovern-Garcia <betsyg@selfhelpenterprises.org>
Sent: Monday, July 17, 2023 2:10 PM
To: Sophia Pagoulatos <Sophia.Pagoulatos@fresno.gov>
Cc: Michelle Zumwalt <Michelle.Zumwalt@fresno.gov>; HousingElement <HousingElement@fresno.gov>; Vanesa Donangtavanh <vanesad@selfhelpenterprises.org>
Subject: RE: City of Fresno Housing Element Public Draft Available
Importance: High

Sophia,

We are concerned that any housing project over 1 unit requires a discretionary approval in the City of Fresno. Would the City consider adding a program to create a process wherein any affordable housing project of 100 units or less, in a zone which allows multifamily housing, would be by-right?

This is a MAJOR barrier in Fresno.

Thanks.
Betsy

From: Sean Z. <[redacted]>
Sent: Sunday, July 30, 2023 7:19 PM
To: HousingElement <HousingElement@fresno.gov>
Subject: Housing element public comment

External Email: Use caution with links and attachments

Housing is way too expensive in Fresno and getting worse. Specifically I think Fresno needs a lot more apartments, particularly tall apartment buildings built near transit lines. We are way too sprawled out and need to focus on building some density around the downtown core. I would really love to see Fresno use a social housing program similar to Vienna, where the city government builds and owns lots of apartment buildings, keeping rent low. I say this as a homeowner that housing prices are out of control and something needs to be done to bring it down. I would also love to see very strict rent control. In addition we need to be building way more housing for the homeless, as its both cruel and unconscionable to have so many people sleeping on the streets, and lessens everyone's enjoyment of the city.

From: Jeffrey M. <[redacted]>
Sent: Thursday, July 27, 2023 5:52 PM
To: HousingElement <HousingElement@fresno.gov>
Subject: Please don,t meddle in things that aren't your purview. Government great at creating additional problems doing things that are free market in nature don't trust you or your motives. Stop meddling:

External Email: Use caution with links and attachments

From: Amber F. <[redacted]>
Sent: Thursday, July 27, 2023 11:31 AM
To: HousingElement <HousingElement@fresno.gov>
Subject:

External Email: Use caution with links and attachments

What part of town are they going to be located in? How much will our taxes go up to pay for this shit? Don't we pay enough already? This state and county is sucking us dry! Soon there will be no one left working and paying taxes, all homeless and welfare, who'll pay then?

From: rudemaq <[redacted]
Sent: Thursday, July 20, 2023 11:36 AM
To: HousingElement <HousingElement@fresno.gov>
Subject: Rental Housing Rehad Assistance

External Email: Use caution with links and attachments

Hello,
I am a owner investor. I have a rental property that recently got inspected by the City for health and safety. The unit pass the inspection with only a couple of minor corrects.
Since this inspection was done by the City.
I was wondering if the City has any programs or know of any other agencies or programs to assist with energy window replacement for energy saving purposes? Such as a loan program or rebates?

Thank you,
Rudy Quintana

From: Kathleen O. <[redacted]>
Sent: Thursday, July 20, 2023 12:02 PM
To: HousingElement <HousingElement@fresno.gov>
Subject: attention: M. Zumwalt, Community Discussion

External Email: Use caution with links and attachments

The city needs to take professionals who are low-income into account. Many people work for entities like Fresno Unified School District but do not make a living wage that lets them afford an apartment or a house. It is absolutely insane that we expect people to teach our children in daycares, preschools, elementary, middle, and high schools, and yet they cannot afford housing because there is no regulation. When an apartment costs nearly $2000, the monthly take-home for many of these workers, and the landlord or management company demands 2x, 3x, even 4x rent in income requirements, you are demanding that homeless teachers teach your children.

From: Glenn Miller <[redacted]>
Sent: Thursday, July 20, 2023 1:38 PM
To: Veronica Martinez <Veronica.Martinez@fresno.gov>
Subject: Re: Multi-Jurisdictional Housing Element

External Email: Use caution with links and attachments

WE HAVE HAPPILY MOVED OUT OF THE FAST DECLINING LIVING CONDITIONS IN FRESNO AND CALIFORNIA. WE HAVE LIVED THERE 70 YEARS AND GREW SICK OF IT. SORRY BUT I SEE NO FIXING IT UNDER CURRENT POLITICAL CONDITIONS, WE ARE IN EAST TN. AND HAVE NEVER FELT SO FREE. GOOD BYE FOREVER. P.S. there 300k others who have done the same just last year.

On Thursday, July 20, 2023 at 10:06:18 AM PDT, City of Fresno <veronica.martinez@fresno.gov> wrote:

From: Cheyenne J. [redacted]
Sent: Thursday, July 20, 2023 9:36 PM
To: Sophia Pagoulatos <Sophia.Pagoulatos@fresno.gov>
Cc: Cheyenne J. <[redacted]>
Subject: SW Planning Meeting Response 7-20-23

External Email: Use caution with links and attachments

Dear Sophia,

You saw how upset I got tonight. I'm not ashamed, maybe a little embarrassed I cursed & made people uncomfortable but oh well! This needs to make people uncomfortable!

I am with UU church of Fresno, Social Justice committee, and sub- committee IAF, Industrial Areas Foundation. We fight for people's rights and justice for all!

The city is lying through their teeth. You know that the affordable housing isn't for us locals, it's for all the commuters living here for cheap & working in LA, SF or Bay Area. Affordable housing means for the outsiders coming into Fresno & buying up stuff. They have no interest in Fresno. They don't shop here or eat here. They just sleep here & occupy space! The city knows the potential here to be the next LA. They don't care about us locals or that they are shortening front yards/backyards for stupid bike lanes & more traffic to come.

Yet you deny this. More pollution. More traffic. More noise. And not a single resident being affected is notified! The city knows & has already deemed these people to be uneducated & so you intimate folks with big words & fancy confusing sentences & spreadsheets so people won't engage. The people will give in! And the city wins.

I sat next to three people who are poor & were waiting for their keys to get into their home tonight. Keys they were promised but nope, city had other plans! These people don't deserve to be lied to and strung along! They were so confused by all the big talk language. It's no wonder the city is getting away with this.

I look at ALL the pamphlets given from tonight! My god. I'm looking at all this information from tonight's meeting and it's BS! The lowest income to qualify for an elderly person is $43,650 & for mortgage assistance it's $46,200. I barely make $43,680 and I have a job! Most people are on welfare, fixed incomes of SSI/SDI/Retirement/etc. or homeless. There's no way for them to qualify for a home. I wouldn't even qualify. Then there's "borrow up to $100,000 and no monthly fees on the loan", For who??? Certainly not me or those more poor. We certainly won't qualify for that.

The City of Fresno knows what they are doing. The water issue is besides the point. This has always been an issue here in Fresno with our water as a wager to gain more power. But the point is the City of Fresno is robbing people of their homes. Their land. Their neighborhoods. Their peace of mind & living. And not telling them the truth! No notice!

My contacts tonight since we are to connect from these events are:
-Alysonn Walker/SW Rep & formed SW
-The pastor of Westside Church of God
-Tasha Jones/Talk2Tasha-Social media site 559-246-7000. Knows Alysonn really well

I wrote my input on the white boards. Doubt it'll go anywhere but land on deaf ears.

And hope you all understand that I'm just super passionate about standing up for what's right! I'm in this mix of people. I sit right in this with them. I'll never have a home of my own. I'll always be stuck in Apt living.

And it's NOT ok! $850/month used to get someone rent on a 1-bedroom home. Now it's $1600 a month.

Please stop this! Thank you!

Live Vertically,
Cheyenne

Sophia,

We are concerned that any housing project over 1 unit requires a discretionary approval in the City of Fresno. Would the City consider adding a program to create a process wherein any affordable housing project of 100 units or less, in a zone which allows multifamily housing, would be by-right?

This is a MAJOR barrier in Fresno.

Thanks.
Betsy

BETSY MCGOVERN-GARCIA

VICE PRESIDENT

Self-Help Enterprises

8445 W. Elowin Court
P.O. Box 6520
Visalia, CA 93290

559-802-1653 Office
559-651-3634 Fax:
betsyg@selfhelpenterprises.org
Http://www.selfhelpenterprises.org

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ACLU AMERICAN CIVIL LIBERTIES UNION Northern California

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TENANTS TOGETHER
California's Statewide Organization for Renters' Rights
www.tenantstogether.org

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Building Healthy Communities FRESNO

October 3rd, 2022

Board of Supervisors, Fresno County
City Councils, Cities of Fresno County
Deputy Director Kristine Cai, Fresno Council of Governments

Re: Fresno COG Multi-Jurisdictional Housing Element Update 2023-2031

Dear Supervisors, Councilmembers, and Kristine Cai:

The undersigned organizations write to you to advocate for a Housing Element process and update that is equitable, inclusive, and responsive to disadvantaged communities' needs. We are a group of community-based organizations working hand-in-hand with community partners and leaders throughout the City and County of Fresno. The following recommendations are based on our experience to push for transformative community-led and identified solutions to elevate and advance their priorities for safe, affordable housing options and fair housing choices. We thank you for taking the time to read the following memo and welcome the opportunity to discuss our letter in further detail. As the Housing Element process begins, it is important and necessary to start the process correctly and with strong community engagement. The Housing Element is an important piece of planning our communities and solving our housing crisis together. Further, the State of California has recently strengthened the laws governing the Housing Element. The Fresno Council of Governments (FCOG), jurisdictions participating in this multi-jurisdictional housing element, and city leaders must apply these laws conscientiously and diligently. With laws such as AB 686 and AB 1397, we expect this Housing Element to be robust, meaningful, and indicative of solving our housing crisis. As always, we are willing to partner and work alongside you all to ensure that these requirements are fulfilled and even exceeded in order to create the change we want to see in the Valley.

We look forward to working alongside the Fresno COG, city leaders, and staff in the multijurisdiction Housing Element update (collectively referred to herein as "Fresno jurisdictions" or "jurisdictions") and solving our housing crisis together.

I. Jurisdictions Must Meaningfully Engage the Public in their Housing Element Updates Practices, Including Lower-Income Residents and Protected Classes

As Fresno jurisdiction begins the 6th Cycle Multi-Jurisdictional Housing Element Update, the jurisdictions must meaningfully engage the public, including in particular lower-income residents, members of protected classes under civil rights statutes, residents of disadvantaged communities, and racially and ethnically concentrated areas of poverty ("R/ECAPs"), and community-based organizations that work closely with these groups over the course of the housing element update. Gov. Code Sec. 65583(c)(9); HCD Affirmatively Furthering Fair Housing Guidance ("AFFH Guidance"), p.21.

The jurisdictions must engage the public throughout the housing element update process, and engagement must support "meaningful, frequent, and ongoing community participation, consultation, and coordination."[1] HCD, Building Blocks, Public Participation. Pursuant to HCD's AFFH Guidance, public participation efforts should be proactively and broadly conducted through various methods to ensure access and participation. Key stakeholders that jurisdictions seek to engage directly must include community-based organizations and advocacy groups which work directly with lower-income households and protected classes; lower-income and extremely-low income households; persons and households with special housing needs, including but not limited to farmworkers, seniors, single-parent households, and persons with disabilities; tenants, including residents of publicly-subsidized housing; members of protected classes, residents of disadvantaged communities and R/ECAPs; and fair housing agencies.[2] Outreach plans should include "in-person meetings in various locations to ensure residents from

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[1] HCD AFFH Guidance, p. 10; Gov. Code §8899.50(a),(b),(c); see also AFFH Final Rule and Commentary (AFFH Rule), 80 Fed. Reg. 42271, 4253-42360 (July 16, 2015)

[2] HCD AFFH Guidance, p. 21

across the jurisdiction have the opportunity to participate."[3] As the process begins, we ask that jurisdictions plan in-person workshops in all parts of the jurisdictions, especially in rural areas where internet access is scarce, and virtual options are impractical.

To satisfy Government Code § 65583(c)(9) and its duties to Affirmatively Further Fair Housing, some specific public outreach efforts that we recommend that jurisdictions undertake to achieve the above-referenced objectives include but are not limited to the following:

- holding interactive housing element workshops in at least three disadvantaged unincorporated communities (DUCs) in areas across the jurisdictions, including fringe and island communities located adjacent to or near participating cities and legacy communities as defined by Government Code § 65302.10. Residents living in DUCs, as well as other lower-income communities and neighborhoods, are most likely to attend workshops held in their own communities because many low-income residents in these communities lack personal vehicles and many DUCs are not served by efficient or reliable public transportation. The jurisdictions should partner with community residents and/or community-based organizations with ties to the community to plan and perform effective outreach for the workshops;
- conducting targeted outreach to and stakeholder interviews with members of special needs populations and protected classes, including but not limited to farm workers, the elderly, members of large families and single-headed households, people of color, and non-English speakers;
- soliciting completion of the community survey performed by the jurisdictions by low income and special needs residents, including by the jurisdictions' housing division and other city and County staff during their interaction with residents in the course of performance of their duties.
- advertising opportunities to participate in and provide feedback on the housing element update in non-English language print media, radio, and television, including media in Spanish, Hmong, and other languages spoken by Fresno County residents. Examples of non-English media outlets include Univision, Radio Bilingue, Hmong TV, and the Vida en el Valle publication among others. Many of these media outlets offer free advertising

[3] HCD AFFH Guidance, p. 10

space for public service announcements. The housing element should document these additional efforts to achieve public participation by all economic segments of the community and explain how input received through those efforts is incorporated therein.

Leadership Counsel is willing to support the jurisdictions in planning these additional public outreach efforts.

In addition, and importantly, the Draft Amendments must meaningfully **incorporate** public input provided on the housing element update, prioritizing input provided by lower-income residents, residents with special housing needs, protected classes, and residents of lower-income and disadvantaged communities. The housing needs analysis sites inventory analysis, assessment of fair housing, including discussion of fair housing issues in R/ECAPs and impacting protected classes, displacement risks, disparities in access to opportunity impacting protected classes, meaningful actions, and programs must all incorporate, reflect, and respond to resident input and priorities. The Multi-Jurisdictional Housing Element must incorporate input from residents from all participating jurisdictions to tailor the analysis, sites inventories, actions, and programs applicable to specific jurisdictions accordingly.[4]

The jurisdictions, cities, and the Fresno COG can start to gain public trust if steps to proactively engage the public, including on an ongoing basis, in the multi-jurisdictional housing element update and incorporate and significantly reflect public input provided. Jurisdictions must ensure that strong public engagement efforts are maintained following jurisdictions' adoption of the element, including, for example, through the incorporation into the housing element of actions committing to the establishment and facilitation of a housing element oversight advisory committee to assist the jurisdictions in obtaining community feedback on housing element implementation from lower-income residents and protected classes.

II. The Multi-Jurisdictional Housing Element Update Must Comply with Cities' and the County's duties under AB 686

[4] HCD AFFH Guidance, p. 21

To avoid the continuation of past and current discriminatory practices and to overcome their legacy, the State of California enacted AB 686 (2018). AB 686 requires the state, cities, counties, and other public agencies to affirmatively further fair housing ("AFFH") in all programs and activities relating to housing and community development. AFFH means taking meaningful actions, in addition to combating discrimination, that overcomes patterns of segregation and fosters inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. It means taking meaningful actions that, taken together, addresses significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws. AB 686 also amended the Housing Element Law to require that housing elements include an assessment of fair housing ("AFH") and identify sites *throughout* the jurisdiction to satisfy its regional housing needs allocation. We recommend that jurisdictions and FCOG carefully review HCD's AFFH Guidance which contains a detailed discussion of AB 686's requirements, including the requirements for a complete AFH. The AFH Some of these requirements include:

- **Summary of Fair Housing Issues.**[5] The Housing Element must analyze and address patterns of integration and segregation; racially or ethnically concentrated areas of poverty; racially concentrated areas of affluence, disparities in access to opportunity for lower-income residents and protected classes,; and disproportionate housing needs impacting lower-income residents and protected classes, including displacement risk. The analysis of disparities in access to opportunity must include disparities in access to educational, employment, transportation, and environmental opportunity and cover the specific topics identified in HCD's AFFH guidance for each opportunity category. HCD's AFFH Guidance, pp. 35-36. The disproportionate housing needs analysis must consider disparities in housing cost burdens, overcrowding, substandard housing, homelessness, and other issues and must evaluate displacement risks holistically, considering the impacts of rising rents, infrastructure and service deficiencies,

[5] https://www.hcd.ca.gov/community-development/affh/docs/affh_document_final_4-27-2021.pdf, pg.11

climate change, and other displacement risks that may disproportionately impact lower-income households and protected classes. The analysis must incorporate local data and knowledge, including the input of lower-income households and protected classes, and discuss the fair housing issues specific to distinct jurisdictions, R/ECAPs, and lower-income communities.

- **Identification and Prioritization of Contributing Factors.** The AFH must analyze and prioritize factors that contribute to identified fair housing issues and prioritize factors that limit or deny fair housing choice or access to opportunity or negatively impact fair housing or civil rights.
- **Sites Inventory AFFH Analysis.**[6] The housing element must not only demonstrate site capacity to accommodate each jurisdiction's RHNA, but also that the identified sites are consistent with the duty to AFFH, serving the purpose of replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity.[7] This evaluation must include the specific components described in the AFFH Guidance, including how sites better integrate the community considering historical patterns and trends; the extent to which sites may exacerbate existing patterns of segregation; whether the RHNA by income group is concentrated in areas of the community; and local data, knowledge, and community input. Based on the outcome of the analysis, the site inventory must be modified, and/or actions must be included to overcome patterns of segregation and barriers to opportunity in relation to the sites contained in the inventory.
- **Meaningful Goals and Actions**. Existing Housing Element Law requires programs with a schedule of actions with timelines and specific commitment to have a "beneficial impact" within the planning period to achieve the goals and objectives of the housing element. As stated in the AFH guidelines "actions implement goals and consist of *concrete steps, timelines, and measurable outcomes.*"

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[6] https://www.hcd.ca.gov/community-development/affh/docs/affh_document_final_4-27-2021.pdf, pg.12

[7] 24 Gov. Code, § 8890.50. subd. (b).

As the draft Housing Element is produced, we will be looking for these components and compliance with jurisdictions' duties under AB 686 to ensure that drafts reflect residents' input and priorities. Further, suppose barriers are identified that impede the application and implementation of programs, policies, and production of housing. In that case, the City should analyzealso analyze these barrierstempt to make a good-faith effort to find alternative solutions.

III. The Housing Element Must Analyze and Incorporate Programs and Policies That Adequately Respond to our Housing Crisis

As discussed above, the housing element must include programs and actions prioritized by lower-income residents, protected classes, and residents of lower-income communities and R/ECAPs during the housing element update to solve our housing crisis. Below are community-identified programs and policies which residents from South Fresno neighborhoods and disadvantaged unincorporated communities across the jurisdictions have repeatedly identified as priorities to solve our housing crisis and AFFH which we ask jurisdictions consider:

a. County of Fresno
    - Create or support expansion of **local funding opportunities for farmworker housing**. Farmworker housing should be accessible for migrant farmworkers and affordable.

b. City of Fresno and County of Fresno:
    - Adopt a **local rent stabilization ordinance,** to protect tenants from continuously rising rents, including a rent stabilization board to hear and approve rental increases submitted by landlords. This would apply to the City of Fresno and Fresno County.
    - Adoption of **tenant protections to reduce displacement risks,** including just cause eviction that address gaps in protections afforded under the 2019 Tenant Protection Act and a right to counsel guaranteeing access to affordable legal counsel for low-income tenants in housing matters;
    - Establish a **permanent emergency rental assistance program** to assist residents at risk of homelessness due to rent increases and changed circumstances and ability to pay. Identification of a permanent local source of funding will ensure

continuous funding and that the program can be used to prevent displacement. *The City of Fresno can leverage the Local Housing Trust Fund dollars and the State is continuing to grant monies for rental assistance programs*

- Establish a **permanent first-time homeownership assistance program** to help tenants become first-time homeowners. Closing costs and downpayment assistance for low-income, first-time homebuyers can help close the housing gap. Residents with ITIN numbers should be eligible for this program.
- Investments in **improvements to mobile home parks** to address the needs, including needs from the mobile park assessment study. Further, it should address weatherization and climate resiliency needs, to improve indoor and outdoor air quality, and to expand access to green space.
- Pursue an **Inclusionary Zoning ordinance** in the County of Fresno and the City of Fresno once a General Plan Update has occurred.
- **Extreme heat and weatherization programs** to address climate change. This includes funding for weatherization upgrades to homes and rental units, specifically in census tracts that rank the highest on CalEnviroScreen for pollution and poor health outcomes and are most vulnerable to climate change.
- **Establish an acquisition and rehabilitation fund** to purchase older, blighted, and/or abandoned homes/buildings. The County and the City of Fresno can establish a revolving fund to insure that rehabilitated homes are sold back to the community at a low cost.
- Grants for residents who want to develop **affordable accessory dwelling units** on their land in both the City and County of Fresno. Some residents are willing to sell parcels of land to the County to develop affordable housing and increase housing supply.
- **Urban Greening is used** as buffer zones when residential is placed or already placed near existing polluting land uses to mitigate health impacts.
- **Citing industrial uses** cannot be sited next to Housing Element sites and compliance with placing housing sites away from heavy, light industrial uses or phasing out light/heavy industrial zones















- **Suitable Vacant Land** should be prioritized for affordable housing in order to bring Very Low Income and Low Income RHNA allocations into compliance
- **Impact fees should be placed into a community benefit fund** when polluting land uses and practices are placed near housing. The community benefit fund will be managed by the community directly impacted to dictate to who these funds should be allocated.

c. All Jurisdictions:

- **Establish local hire provisions** requiring that a certain percentage of workers reside within 10 miles or less of a Project Site. This can reduce the length of trips, reduce greenhouse gas emissions and provide localized economic benefits
- **Developing Public Health Impact Reports** for new development in order to understand existing public health disparities and the potential of those conditions worsening as a result of development. Public health agencies should be resourced to support this analysis. The findings of these reports should be available publicly and be included in permit approval processes and other key decision-making milestones.
- **Establish a Cargo/Freight Prohibition and Revenue Tax** to directly fund community-based housing and projects in the neighborhoods most negatively impacted by years of environmental toxicity caused by freight.
- **Incorporate Complete Streets principles** into all transportation projects at all phases of development, including planning and land use decisions, scoping, design, implementation, maintenance, and performance monitoring.
- **Establish a Housing Element Implementation Committee** to oversee the timelines and implementation of each program and policy. The committee should be comprised primarily by tenants, low-income homeowners, and at-risk populations to ensure implementation meets the needs of most at-risk communities.

IV. The Sites Inventory Must Comply with New Housing Element Law Requirements, Including Requirements for Access to Infrastructure and Services Under AB 1397

As aforementioned, the State of California has added further requirements and specificity to the obligation of the Housing Element to identify adequate sites for further development of affordable housing.

Under AB 1397, for all sites in the inventory, the jurisdiction must determine the number of units "that can be realistically accommodated.[8] These requirements do not include "current or planned availability and accessibility of sufficient water, sewer and dry utilities."[9] In other words, sites that are served by water, sewer, and other dry utilities available and accessible within three years of the beginning of the planning period will be considered suitable for residential development. In addition, jurisdictions may not reuse on-vacant sites identified in a prior housing element or vacant sites identified in the last two housing element updates to meet lower-income RHNA requirements.

Finally, we recommend FCOG and the jurisdictions ensure that sites chosen conform to HCD's site inventory guidance. Following HCD's guidance would increase planning efficiency for local agencies, while ensuring compliance with housing element requirements. We look forward to seeing local compliance.

* * * * *

Thank you for taking our comments into consideration. We look forward to continuing to work with the Fresno jurisdictions on developing a compliant Housing Element that responds to the needs of participating Fresno Jurisdiction Residents and ensures access to safe and affordable housing for all.

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[8] Cal Gov Code 65583.2(c)
[9] Cal Gov Code 65583.2(c)(2)

Sincerely,
Karla Martinez, Policy Advocate
Leadership Counsel for Justice and Accountability

Alexandra Alvarado, Community Organizer
Faith in the Valley

Marisa Moraza, Senior Campaign Strategist
PowerCA Action

Shar Thompson, CV Regional Coordinator
Tenants Together

Josefa Vega, Central Valley Regional Organizer
ACLU Northern California

Ruben Espinoza, Policy Advocate
Fresno Barrios Unidos

Guadalupe Ramos, Project Specialist
Fresno Building Healthy Communities





A Regional Plan for Addressing Housing Needs

Fresno County • Coalinga • Firebaugh • Fowler • Fresno City • Huron • Kerman
Kingsburg • Mendota • Orange Cove • Parlier • Reedley • San Joaquin • Sanger • Selma