

APPENDIX 1L: CITY OF REEDLEY

Fresno Multi-Jurisdictional 2023-2031 Housing Element

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SUMMARY OF NEEDS AND CONDITIONS

Housing Needs Assessment

As part of the Housing Element, the City prepared a detailed Housing Needs Assessment (Section 2) analyzing Reedley's demographics. The Housing Needs Assessment identified a number of trends that informed the goals, policies, and programs of the updated Housing Element, including:

- Reedley's population has had slower annual growth with a predominately Hispanic or Latino population. The slow increase since 2000 was similar for all households. The city's average annual growth was 0.9 percent from (2000 to 2022), which is the fourth lowest in the county. The average annual growth in the number of households in the city was 0.7 percent, the same average as the city of Fresno and the county as a whole.
- Further, the City of Reedley had a relatively high vacancy rate (6.8 percent) compared to the lower rates in neighboring cities Between 2010 and 2022, vacancy rates in the city increased from 4.3 percent to 6.8 percent across all housing units, owned and rented. During this same period, the vacancy rates for the most communities in the county decreased. An identified trend for the increase of vacancy rates may indicate an excess supply of units, a softer market, and lower housing prices. Additionally, the increase in the vacancy rate may be indicative of a housing stock issue.
- In 2022, more than two-thirds of the housing stock was single-family, detached housing (70.8 percent), compared to 70.3 percent countywide. 25.6 percent of units in the city were in multifamily buildings, compared to 25.4 percent countywide. Mobile homes comprised 3.6 percent of the city's housing stock, compared to 4.3 percent countywide. As stated previously, homeowners account for 58.1 percent of households in Reedley, compared to a countywide rate of 53.7 percent. About 59.1 percent of housing stock in the city is more than 30 years old, and 32.1 percent of housing stock is more than 50 years old. These are similar rates to the county.
- Between 2021 and 2022, Reedley's home sale price increase was among the most stable in comparison to surrounding cities, with an average price increase of 4.9 percent. This compares to an average price increase of 15.4 percent countywide. In the year 2022, 24 homes were sold in Reedley with a median price of \$320,000. In comparison, the median sales price for homes in all of Fresno County was \$375,00 in 2022. In 2022, 24 homes were sold in Reedley with a median price of \$320,000. In comparison, the median sales price for homes in Reedley was \$175,000 in 2014.
- Reedley residents are primarily employed in agriculture (27.2 percent of jobs), educational services, and health care (22.4 percent of jobs), and manufacturing (8.8 percent of jobs), which is consistent with data from 2011 with the exception of manufacturing, which has seen a recent increase. This shows a slight change within the employment industry for Reedley. While unemployment in Reedley as a whole increased from 11.8 percent in 2014 to 12.5 percent in 2022, this is likely due, at least in part, to the COVID-19 pandemic that resulted in high unemployment rates nationwide.

- Looking closer at special-needs groups within Reedley, large households saw a 7.0 percent decrease from 2010 increasing from 34.1 to 26.8 percent in 2020. Seniors, persons with disabilities, and female-headed households all saw anywhere from a 0.6 to a 2.0 percent decrease. While the need may not be as high as it was in previous years, the need is still there.
 - The City has included Program 7, Program 10, Program 14, and Program 17 to facilitate construction of 150 multifamily units during the planning period and remove any potential constraints for the construction of affordable multifamily units.
- Given the substantial size of the farmworker population in Reedley, the housing needs for this group are significant. In 2020, 27.2 percent of the city's population was employed in agriculture, compared to 8.8 percent countywide. Thus, the need for farmworker housing is much higher in Reedley than the typical community. Looking at the U.S. Department of Agriculture (USDA) Census of Farmworkers, the number of permanent farmworkers in Fresno County has decreased slightly from 2002 to 2017, decreasing from 18,751 to 16,876 farmworkers. However, there was a slight increase from 2007 to 2012, from 14,873 to 17,751 farmworkers. Of the 58,762 farmworkers in the county in 2017, 64.3 percent worked 150 days or more each year, and 35.7 percent worked less than 150 days per year.
 - Therefore, to prioritize housing for farmworkers, the City has included **Program 8** to provide assistance in the form of letters of recommendation for grant applications and **Program 9** to require the developer to give qualified farmworker households a preference for 15.0 percent of the new units.
 - o Additional resources to assist farmworkers are listed in the Regional Multijurisdictional Housing Element in Table 2-45, Resources for Farmworkers.
- About 10.0 percent of the city's population is composed of seniors, compared to 12.0 percent of the countywide population. 40.6 percent of seniors in the city had a disability, compared to the countywide average of 41.6 percent. Approximately 72.8 percent of senior households were owner-occupied, and 27.2 percent were renter-occupied. The city had a slightly lower percentage of senior households than in the county overall.
 - 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.
 - O Through Programs 20, 21 and 22, the City will facilitate assistance with home rehabilitation, which may include accessibility modifications that can assist seniors, particularly those on fixed incomes who cannot afford to make home improvements.
- Reedley had a relatively lower rate of residents with disabilities compared to the county as a whole (11.1 percent compared to 12.9 percent countywide). Ambulatory difficulties were the most commonly reported disability.

- Through **Program 16**, the City will include accessibility considerations in the preparation of the City's Capital Improvement Plan and the allocation of funding for capital improvements in support of housing and residential neighborhoods for persons with physical or developmental disabilities and encourage developers to include accessibility features in home designs.
- O 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.
- Lower-income Reedley households cannot afford the maximum affordable purchase price for existing and newly constructed homes. Overcrowding is another issue that Reedley faces. The California Department of Housing and Community Development (HCD) defines an overcrowded unit as one occupied by 1.01 persons or more per room (excluding bathrooms and kitchens). Units with more than 1.5 persons per room are considered severely overcrowded.
 - O As shown, the city had a higher rate of household overcrowding than the county as a whole (7.7 percent of households in Reedley compared to 6.1 percent of households in the county). Overcrowding increases health and safety concerns and stresses the condition of the housing stock and infrastructure. However, the city also has a lower rate of severely overcrowded households (3.2 percent compared to 3.6 percent of households in the county).
 - Overcrowding in Reedley is related to income level, because generally overcrowding levels tend to decrease as income rises. When considering overpayment rates, unit type by tenure, and recent development trends, renters appear to have a disproportionate housing need for adequately sized and priced housing opportunities in the city.
 - o In response to this need, the City has included **Program 12** to encourage construction of accessory dwelling units (ADUs) as a potential future affordable housing opportunity, Program 14 to support affordable development in a range of income, **Program 23** to assist low-income first-time homebuyers, **Program 25** to improve access to Section 8 housing opportunities for renters, and **Program 15** to promote the use of density bonuses to expand the affordable housing supply, among other programs.
- Large households saw a 7.0 percent decrease from 2010 increasing from 34.1 to 26.8 percent in 2020, compared to 18.1 percent of the countywide population. Compared to the county, Reedley had a higher percent of large households.
 - While the need may not be as high as it was in previous years, the need to accommodate larger household sizes in the city remains present.
 - Programs 7, 10, 14, and 17 have been included to facilitate construction of 586 multifamily units during the planning period and remove any potential constraints for the construction of affordable multifamily units.

- Just under half of all households in the city (42.2 percent) were overpaying for housing, meaning that they paid more than 30 percent of their income towards housing. This is compared to the countywide rate of 37.8 percent. Of those households in the city, 75.1 percent were lower-income households, compared with 70.6 percent countywide.
 - O To address the problem of overpayment, sites for new units have been identified across a range of areas in the city in terms of overpayment rates for both owners and renters with the intent of increasing the supply of affordable housing for all income categories, thus reducing risk of displacement due to overpayment for all Reedley residents.
 - o In response to these needs, the City has included **Program 7** to work with housing developers to expand affordable housing, **Program 25** to increase the availability of information and access to Section 8 rental assistance and units, and **Program 10** to incentivize and encourage construction of units specifically targeting extremely low-income households to reduce displacement. These efforts are also addressed in **Program 15** to remove governmental constraints with regard to development standards and barriers to special-needs housing opportunities.
 - 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.
 - Federal and state resources such as Section 8 rental assistance, 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.
- Reedley has the highest percentage of cost-burdened lower-income households in the county (75.1 percent of lower-income households). It also had the highest percentage of lower-income renters overpaying for housing (82.1 percent).
 - O Program 25 has been included to increase the availability of information and access to Section 8 rental assistance and units, as well as to work with the Fresno Housing Authority to encourage landlords and property managers in Reedley to make units available for 100 units serving lower-income households using HCVs.
 - o In addition, the city will incentivize development of affordable housing to meet a range of housing needs and sizes (**Program 7**), facilitate the provision of farmworker housing (**Program 8** and **9**) incentivize development of housing for extremely low-income households (**Program 10**), encourage the construction of ADUs, particularly in higher income single-family areas (**Program 12**), encourage a variety of housing types (**Program 14**).

- Federal and state resources such as Section 8 rental assistance, 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. In addition, the Fresno Housing Authority provides affordable housing to over 50,000 residents throughout Fresno County, either through Housing Choice Vouchers (HCV) or in Housing Authority-owned complexes. The HCV program currently assists 12,000 households.
- O Key resources such as the California Housing Finance Agency (CalHFA) Residential Development Loan Program, Rural Development Loans and Grants, California Housing Finance Agency (CalHFA) Homebuyer's Down Payment Assistance Program, and Multifamily Housing Program can assist low-income households with providing essential social services, prevent homelessness, and connect individuals with affordable housing.
- Extremely low-income households are defined as those households with incomes under 30 percent of the county's median income. Extremely low-income households typically consist of minimum wage workers, seniors on fixed incomes, the disabled, and farmworkers. There were 830 extremely low-income households in Reedley, making up 11.8 percent of the total households in Reedley, compared to 13.3 percent countywide. Of those, 62.7 percent were renter households, and 37.3 percent were owner-occupied households. The total number of housing units proposed to be constructed, rehabilitated, or conserved for extremely low-income households through every program's quantified objective is 201.
 - Of those, 62.7 percent were renter-occupied households and 37.3 percent were owner-occupied households. Additionally, Reedley is the jurisdiction in the county with the highest number of extremely low-income households overpaying for housing (90.4 percent). This indicates a greater need for rental housing to support extremely low-income households.
 - o Further, 90.4 percent of all extremely low-income households are overpaying for housing, a higher rate than very low-income households (81.0 percent) and low-income households (63.2 percent). In 2018, 11.5 percent of households were extremely low income countywide, compared to 10.0 percent of households countywide in 2010. Given the significantly higher rates of overpayment among extremely low-, very low-, and low-income households, there is a great need for financial support and affordable units to meet the needs of these populations.
 - The cities of Sanger, Parlier, Reedley, and Orange Cove are all in close proximity of each other and have the highest numbers of extremely low-income households overpaying for housing in the county. In response to this need, the City has included **Program 7** to work with housing developers to expand affordable housing, **Program 25** to increase the availability of information and access to Section 8 rental assistance and units, and **Program 10** to incentivize and encourage construction of units specifically targeting extremely low-income households to reduce displacement.

- o Key resources such as Section 8 rental assistance, 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.
- The percentage of Reedley households with a single female head of household was the same as the countywide rate (7.3 percent). Additionally, 29.5 percent of female-headed households in the city were living under the poverty level, which is less than the rate in the county overall (34.0 percent).
 - The City has included **Program 7** to provide affordable housing, with an emphasis on housing opportunities special-needs populations, such as female-headed households.
 - O Key resources for this special-needs population include Centro La Familia, who provides support services to families and victims of domestic violence and sexual assault, California Rural Legal Assistance, who provides legal and housing counseling, Green Raiteros who provides transportation, workforce development and small business advancement and Rural Mobile Health who provides no-cost medical services. These services can be crucial for female-headed, single-parent households.
- According to estimates of the 2022 Point-in-Time count, 10 persons were experiencing homelessness in Reedley, similar to neighboring cities like Selma. This was a decrease from the 2014 PIT count in the existing Housing Element where 16 individuals were identified. However, according to local estimates, approximately 38 persons were unsheltered, accounting for 0.2 percent of the population of Reedley.
 - O The City has included **Program 3** to address homelessness and the needs of the unhoused population. As local direct assistance programs become available, support informational outreach near the Reedley Parkway and at local shopping centers as well as to owners of orchards in the area near South Buttonwillow and Manning Avenues.
 - O Key resources such as the Central California Food Bank, Emergency Shelter Grant Program, RH Community Builders, Centro La Familia, the Central California Food Bank, Rural Mobile Health, Catholic Social Services, Emergency Housing Center (Plaza Terrace), Evangel Home, Inc., United Way, Fresno Rescue Mission, and Marjaree Mason Center, and Green Raiteros are available to assist the unhoused population of Reedley with services such as workforce development, food assistance, support services, and assisting community members in accessing needed services and increasing the inventory of affordable housing.
 - 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.

Housing Constraints

While the City has made extensive efforts to encourage development of affordable and market-rate housing, there are many governmental and nongovernmental constraints that can make housing development more difficult. Governmental constraints are typically rules that apply to all development and are intended to meet other community interests.

- The Central Downtown designation permits densities up to 30 dwelling units per acre allowing for a variety of housing types, including high-density affordable housing.
- Updates will need to be made to the City's Zoning Code to align the City's emergency shelter parking requirements with State law.
- Other Zoning Code updates that will be required in order to bring the code in line with State law include changes to the zones that permit employee housing, residential care facilities for six of fewer, accessory dwelling units (ADUs) in multifamily and mixed-use zones, and lowbarrier navigation centers as well as changes to apply managerial standards for emergency shelters.
- The growth management policy in the Land Use Element is not a constraint to meeting the city's housing needs and does not limit future annexations.
- The City's Affordable Housing Density Bonus will need to be updated to be consistent with State law.
- City building and permitting fees and regional exactions that offset impacts on existing infrastructure like parks and roadways add to the cost of housing development. The higher rate of fees for multifamily housing may pose a constraint on development of this housing type.
- The City does not have a design review process. Therefore, typical housing projects for single-family and multifamily housing complying with zoning and the General Plan are approved ministerially.
- The City does not have an ordinance for reasonable accommodations and included a program to address constraints on housing for persons with disabilities.

Nongovernmental constraints include challenges such as water access, the desire to preserve land for agricultural use, availability of financing, and the high cost of land in the city and across the region. A number of the goals and policies in the Housing Element are aimed at eliminating or lessening constraints to development of housing.

Housing Resources

A major component of the Housing Element is an analysis of sites that are available for the development of housing to meet the City's RHNA. The Housing Element identifies sites in Reedley where zoning is in place to allow for housing development, including higher-density housing (30 units per acre) that is suitable for affordable housing development.

Reedley has sufficient housing sites to meet its lower-, moderate-, and above-moderate housing allocation.

City programs to promote and facilitate housing affordability include actions such as:

- Working with agencies to guard against the loss of housing units available to lower-income households.
- Participating in the Fresno County Rental Rehabilitation Program.
- Promoting the availability of the County's Homebuyer Assistance program.
- Seeking partnerships with other jurisdictions in the region and agencies such as the Housing Authority to explore viable options for increasing the availability of farmworker housing in suitable locations in the region.

SECTION 1L-1: ACTION PLAN

Regional Collaboration

Program 1: Regional Collaboration on Housing Opportunities

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 following efforts will be made to further regional collaboration:

- The City will continue to participate in the countywide Housing Element Technical Committee to collaborate on housing program implementation and regional issues, including disadvantaged unincorporated communities (Senate Bill [SB] 244), infrastructure challenges, farmworker housing, homelessness, and fair housing.
- The countywide Housing Element Technical Committee will meet at least biannually to evaluate successes in implementation of programs and to identify gaps and additional needs.
- The County of Fresno Public Works and Planning Department, with assistance from the Fresno Council of Governments (FCOG), will take the lead in coordinating biannual committee meetings.
- The Housing Element Technical Committee will meet annually with the California Department of Housing and Community Development (HCD) to discuss funding opportunities and challenges in implementation of programs and seek technical assistance from HCD and other State agencies in the implementation of housing programs and the pursuit of grant funding.
- The Housing Element Technical Committee will advocate on behalf of the Fresno region for more grant funding for affordable housing and infrastructure improvements.
- The City will continue to seek partnerships with other jurisdictions in the region and other agencies (such as the Housing Authority), housing developers, community stakeholders, and agricultural employers/employees to explore viable options for increasing the availability of farmworker housing in suitable locations in the region.
- The City will develop a directory of services and resources for lower-income households available in the region, and review and update it annually. The directory will be available on City/County websites and at City/County offices.

Financing:	General Fund
Time Frame:	Continue to meet with the Housing Element Technical Committee twice per year; meet with HCD annually. Develop a directory of services and resources by December 2025, update annually as needed.
Implementation Responsibility:	Community Development Department (Planning Division)
Relevant Policies:	Policy 1.3, Policy 1.4, Policy 2.1, Policy 4.2

Program 2: Review Annexation Standards in Memorandum of Understanding

Most jurisdictions in Fresno County are subject to the City/County Memorandum of Understanding (MOU), which establishes procedures for annexation of land to cities. The City/County MOU encourages urban development to take place within cities and unincorporated communities where urban services and facilities are available or planned to be made available to preserve agricultural land. The MOU standards for annexation require that a minimum of 25 percent of annexation areas have an approved tentative subdivision map or site plan. While cities can take certain steps to "prezone" land in advance of annexation, the annexation of the land into city limits depends on private developers requesting an annexation. In cities that are mostly built out within their current city limits, the MOU may limit the cities' ability to accommodate future housing needs. As seen in Section 1L-2: Sites Inventory, the City can meet its RHNA without any additional annexations. All sites are in current city boundaries.

The County of Fresno and cities within the county shall work together at least once during the planning period to review and revise, as deemed appropriate by all parties, the standards for annexation contained in the City/County MOU.

Financing:	General Fund
Time Frame:	Meet with the County by December 2026 to review the MOU standards, and update within a year if changes are needed.
Implementation Responsibility:	Community Development Department (Planning Division)
Relevant Policies:	Policy 1.1, Policy 1.2, Policy 1.3, Policy 1.4

Program 3: Homeless/Unhoused Needs

The City will cooperate with neighboring cities, the County, and other agencies in completing the Point-in-Time count every other year and the development of programs aimed at providing homeless shelters and related services. As a part of this coordination, the City will:

- Reach out to local colleges and universities and local and regional homeless service providers, either individually or as part of the Housing Element Technical Committee, by July 2024 to identify partnership opportunities to conduct Point-in-Time counts.
- Meet with interested partners at least 6 months prior to each January Point-in-Time count to identify and implement strategies to recruit volunteers and conduct a local count.
- Monitor the demographic composition of the unhoused population to identify needs for targeted resources and determine what efforts to take, such as providing education on financial assistance and programs available.
- Support local homeless service providers, agencies, and other community organizations to pursue funding from available sources for homeless services. As local direct assistance programs become available, support informational outreach near the Reedley Parkway and at local shopping centers as well as to owners of orchards in the area near South Buttonwillow and Manning Avenues.

Financing:	General Fund
Time Frame:	Reach out to potential partner organizations by July 2024 and hold strategy meetings 6 months prior to scheduled Point-in-Time counts.
Implementation Responsibility:	Community Development Department and Police Department
Relevant Policies:	Policy 1.1, Policy 1.2, Policy 4.6
Quantified Objective:	Conduct a biannual Point-in-Time count and assist with program development and funding identification that will assist at least five homeless persons.

Adequate Sites

Program 4: Provision of Adequate Sites

The City of Reedley will provide for a variety of housing types and ensure that adequate sites are available to meet its Regional Housing Needs Allocation (RHNA) of 1,463 units. As part of this Housing Element update, the City has developed a parcel-specific inventory of sites suitable for future residential development. The suitability of these sites has been determined based on the development standards in place and their ability to facilitate the development of housing to meet the needs of the City's current and future residents, pursuant to State laws. The City will:

Maintain and annually update the inventory of residential land resources for internal purposes.

- Monitor the availability of sites appropriate for lower-income housing in keeping with state "no net loss" provisions (Government Code Section 65863), if development projects are approved at densities lower than anticipated in the sites inventory, and, if necessary, rezone sufficient sites to accommodate the RHNA within 180 days, ensuring that there is sufficient higher-density residential land available in areas throughout the city to deconcentrate poverty.
- Monitor and report residential development through the HCD annual report process.
- Actively participate in the development of the next RHNA Plan to ensure that the allocations are reflective of the regional and local land use goals and policies.

Financing:	General Fund
Time Frame:	Annually monitor as projects are processed.
Implementation Responsibility:	Community Development Department
Relevant Policies:	Policy 1.1, Policy 1.2, Policy 1.3, Policy 1.4, Policy 1.5, Policy 1.6, Policy 1.7, Policy 1.8, Policy 1.9

Program 5: Water and Wastewater Service

The development viability of the vacant sites in the inventory is directly linked to the availability and capacity of public facilities and services. As the water and wastewater provider in the city, the City will adopt a written policy with specific objective standards for meeting the priority requirement for proposed developments that include housing units affordable to lower-income households consistent with the provisions of California Government Code Section 65589.7.

The City will also incorporate prioritization for affordable units in the City's Urban Water Management Plan and any future Master Plans and will maximize the use of the City's Community Development Block Grant (CDBG) allocated share to address deficient or non-existent infrastructure in support of housing.

Financing:	General Fund, CDBG
Time Frame:	Adopt a policy by July 2025
Implementation Responsibility:	Community Development Department and Public Works Department
Relevant Policies:	Policy 1.7

Program 6: Use of Sites in Previous Cycles

Pursuant to Government Code Section 65583.2(c), any non-vacant sites identified in the prior 5th Housing Element Cycle or vacant sites identified in two or more consecutive planning periods, shall allow densities of 20 dwelling units to the acre and a project shall be provided by-right development when at least 20 percent of the units in the proposed development are affordable to lower-income households.

Financing:	General Fund
Time Frame:	Update General Plan and Zoning Ordinance by June 30, 2024.
Implementation Responsibility:	Community Development Department (Planning Division)
Relevant Policies:	Policy 1.1, Policy 1.2

Affordable Housing Development and Preservation

Program 7: Affordable Housing Incentives

The City continues to have needs for affordable housing for lower-income households, especially for seniors, persons with disabilities (including persons with developmental disabilities), farmworkers, female-headed and single-parent households, persons experiencing homelessness, and extremely low-income households. The City will continue to work with housing developers to expand affordable housing opportunities by doing the following:

- Continue to seek partnerships and meet at least every other year with other agencies (such as the Housing Authority), housing developers, community stakeholders, and employers to discuss and pursue viable opportunities for providing affordable housing, with an emphasis on housing opportunities for very low- and extremely low-income households, as well as special-needs populations, such as seniors, persons with disabilities (including developmental disabilities), farmworkers, female-headed and single-parent households, persons experiencing homelessness, and extremely low-income households. Meet more frequently if development rates increase. The City will identify development opportunities for affordable housing on an annual basis and provide this information to city partners.
- Work with public or private sponsors to identify candidate sites for new construction of housing for special needs and take all actions necessary to expedite processing of such projects.
- Pursue partnerships with the Central Valley Regional Center to identify funding opportunities and promote housing for persons with disabilities.
- Continue to offer fee reductions and deferral of development impact fee payments to facilitate affordable housing development and special-needs projects, particularly those on infill sites.

- Continue to promote the State density bonus and provide streamlined processing to facilitate affordable housing development and provide for additional flexibility for affordable housing and special-needs housing through the minor deviation process. The City will promote this program by publicizing the incentives on the City website and by conducting pre-application consultation with developers regarding available incentives. Examples of flexible development standards include reduced parking requirements; reduced requirements for curb, gutter, and sidewalk construction; common trenching for utilities; and reduced water and wastewater connection fees.
- Provide incentives to builders to provide housing with multiple bedrooms affordable to lowerand moderate-income households, aiming for construction of at least 20 units that meet these sizes, 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).
- Continue to streamline the environmental review process for housing developments to the extent possible, using available State categorical exemptions and federal categorical exclusions, when applicable.
- Monitor HCD's website annually for Notices of Funding Ability (NOFA) and, where appropriate, prepare or support applications for funding for affordable housing for lower-income households (including extremely low-income households), such as seniors, disabled (including persons with developmental disabilities), the homeless, and those at risk of homelessness.
- Facilitate the approval process for land divisions, lot line adjustments, and/or specific plans or master plans resulting in parcel sizes that enable affordable housing development and process fee deferrals related to the subdivision for projects affordable to lower-income households.
- Work with developers of multifamily and affordable housing projects on an annual basis to identify site opportunities in higher-resource areas and areas with higher median incomes to reduce concentrations of poverty (e.g., in the City Center East, South Columbia/East Early Avenue, and Duff and Buttonwillow neighborhoods) and improve access to resources.

Financing:	HOME, CDBG, Low-Income Housing Tax Credit (LIHTC), Multifamily Housing Revenue Bond, and other funding sources, as available.
Time Frame:	Ongoing, as projects are processed by the City. Annually apply for funding and engage with Central Valley Regional Center at least every two years. Identify affordable housing development opportunities on an annual basis.
Implementation Responsibility:	Community Development Department

Quantified Objective:	Encourage development to expand the City's affordable housing inventory by
	586 units over the next eight years, 201 extremely low-income, 202 very low-
	income, and 183 low-income units, at least 50 of which include accessibility
	modifications to facilitate housing mobility for lower-income households and
	special-needs groups. Identify 50 percent of site opportunities in higher-
	resource areas and areas with higher median incomes to reduce concentrations
	of poverty (e.g., in the City Center East, South Columbia/East Early Avenue,
	and Duff and Buttonwillow neighborhoods) and improve access to resources.
Relevant Policies:	Policy 1.2, Policy 2.1, Policy 2.2, Policy 2.3, Policy 2.4, Policy 2.5, Policy 2.7,
	Policy 4.3, Policy 4.4, Policy 5.2

Program 8: Support Funding for Farmworker Housing

The farming industry is the foundation of the County's economic base. According to the United States Department of Agriculture (USDA) 2017 Census of Agriculture, about 37,819 workers were employed in farm labor throughout the county, indicating a significant need to provide housing for farmworkers and their families, particularly during peak harvest seasons.

The City will provide technical support and offer incentives to housing developers, such as the Fresno Housing Authority and Self-Help Enterprises, in the application of funds for farmworker housing, including HCD (e.g. Joe Serna grant program) and USDA Rural Development loans and grants, other programs administered by California's Office of Migrant Services (OMS), and other funding sources that may become available. The City will also continue to 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 twice during the planning period. The City will also annually review the availability of funding opportunities to provide housing vouchers or other forms of rental assistance and apply as opportunities arise.

To address existing conditions in farmworker housing, as part of **Program 22** the City's Fire Department, which is responsible for code enforcement, will conduct outreach at least twice during the planning period to any housing known to serve farmworkers to review conditions and will provide information about available rehabilitation funding programs as needed.

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 incentives are effective in facilitating the provision of farmworker housing. The City will make necessary changes to enhance opportunities and incentives for farmworker housing development as needed.

Financing:	General Fund
Time Frame:	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. Identify farmworker housing development opportunities at least twice in the planning period.
Implementation Responsibility:	Community Development Department
Quantified Objective:	Support and incentivize development of 40 lower-income units for farmworkers and their families to reduce displacement risk for this population. Particular focus will be given to encouraging housing mobility by facilitating development of farmworker units in higher-opportunity areas, including the Riverbottom neighborhood, the River Ridge neighborhood; and the Reedley Estates, Kingswood Estates, Frankwood Heights, and Hollywood neighborhoods in northern Reedley.
Relevant Policies:	Policy 1.2, Policy 2.1, Policy 2.2, Policy 2.4, Policy 2.5, Policy 4.2, Policy 4.3

Program 9: Farmworker Preference in New Affordable Housing

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 15 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 monitor the effectiveness of the preference policy and if it is not found to be effective, will identify and implement other approaches to meeting the need for housing for farmworker households.

Financing:	General Fund, CDBG, HOME, USDA Rural Development
Time Frame:	Ongoing, as projects are processed through the Planning Division and Community Development Department; annually reach out to developers and determine next steps within six months. Monitor the effectiveness of the preference policy annually via the Housing Element Annual Progress Report. After the 2025 Annual Progress Report in Spring 2025, determine whether the policy has been effective in housing farmworker households. If the policy has not been effective, the City will identify and implement other methods for meeting the farmworker housing need and begin implementing them by the end of 2025.
Implementation	Community Development Department

Responsibility:	
Quantified Objective:	Through incentives and preference requirements, facilitate housing mobility opportunities for 80 lower-income farmworkers or other qualified households to reduce displacement risk. Particular focus will be given to encouraging housing mobility by facilitating development of lower-income units in higher-opportunity areas, including the Riverbottom neighborhood, the River Ridge neighborhood; and the Reedley Estates, Kingswood Estates, Frankwood Heights, and Hollywood neighborhoods in northern Reedley.
Relevant Policies:	Policy 1.2, Policy 2.1, Policy 4.2, Policy 4.3

Program 10: Extremely Low-Income Households

Assembly Bill (AB) 2634 requires the quantification and analysis of existing and projected housing needs of extremely low-income households. The City permits single-room occupancy (SRO) units in the RM-2, PO, and CS zones, which are often more affordable to those with extremely low incomes. To further support the development or rehabilitation of SRO units and/or other units affordable to extremely low-income households, such as supportive and multifamily units, the City will continue to seek and pursue state and federal funds to offer a variety of incentives or concessions, such as:

- Provide financial support annually, as available, 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.
- Expand regulatory incentives for the development of units affordable to extremely low-income households and housing for special-needs groups, including persons with disabilities (including developmental disabilities), and individuals and families in need of emergency/transitional housing.
- 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.
- Encourage the development of SRO facilities, transitional and supportive housing, and other special housing arrangements, including committing City funds to help affordable housing developers provide SRO facilities consistent with the SRO Ordinance.

Financing:	General Fund, CDBG, HOME
Time Frame:	Ongoing; as projects are processed by the Planning Division. By December 2024, conduct outreach to organizations that support extremely low-income

	residents to understand funding needs, and review and prioritize local funding at least twice in the planning period, and support expediting applications on an ongoing basis.
Implementation Responsibility:	Community Development Department
Quantified Objective:	Through regulatory and/or financial support, facilitate construction of 586 lower-income units, including 201 units for extremely low-income households to prevent displacement and provide housing mobility opportunities. Particular focus will be given to facilitating development of lower-income units in higher-opportunity areas, including the Riverbottom neighborhood, the River Ridge neighborhood; and the Reedley Estates, Kingswood Estates, Frankwood Heights, and Hollywood neighborhoods in northern Reedley.
Relevant Policies:	Policy 1.2, Policy 2.1, Policy 4.2, Policy 4.6

Program 11: Preservation of At-Risk Housing Units

Preserving the existing affordable housing stock is a cost-effective approach to providing affordable housing in Reedley. The City must guard against the loss of housing units available to lower-income households. As of September 2022, there are 40 affordable units at Springfield Manor and 23 units at Reedley Elderly that are considered at risk of conversion to market rate in the next 10 years. For complexes at risk of converting to market rate, the City shall:

- Contact property owners of units at risk of converting to market-rate housing within one year
 of affordability expiration to discuss the City's desire to preserve complexes as affordable
 housing.
- Coordinate with owners of expiring subsidies to ensure the required notices to tenants are sent out at 3 years, 12 months, and 6 months.
- Reach out to agencies interested in purchasing and/or managing at-risk units.
- Work with tenants to provide education regarding tenant rights and conversion procedures pursuant to California law.
- Contact California Housing Partnership Corporation (CHPC) annually to inquire about the status of Reedley Elderly Senior Apartments and Springfield Manor to determine whether either property has any changes in ownership or expressed interest in changing ownership status or interest in prepaying their USDA loan. If any potential threat to affordability is identified, the City will contact the property owners immediately and take action, as described in this program.

 Continue to seek partnerships with affordable housing providers and pursue funding opportunities as they become available to ensure the continued affordability of at-risk units.
 The City will review funding opportunities annually and apply as opportunities become available.

Financing:	General Fund, LIHTC, Multifamily Housing Revenue Bond, and other funding sources as available.
Time Frame:	Annually monitor units at risk of converting; coordinate noticing as required per California law. The City will review funding opportunities annually and apply as opportunities become available.
Implementation Responsibility:	Community Development Department
Quantified Objective:	Preserve at least 63 lower-income units as funding expires to reduce displacement risk.
Relevant Policies:	Policy 3.6

Program 12: Encourage and Facilitate Accessory Units

An accessory dwelling unit (ADU), sometimes called a "second unit" or "granny flat," is an additional self-contained living unit either attached to or detached from the primary residential unit on a single lot. It has cooking, eating, sleeping, and full sanitation facilities. ADUs can be an important source of affordable housing given that they typically are smaller and have no associated land costs. The City will encourage the construction of ADUs, particularly in predominantly single-family neighborhoods with higher median incomes, such as the Riverbottom neighborhood, to reduce concentrations of lower-income households (e.g., in the City Center East, South Columbia/East Early Avenue, and Duff and Buttonwillow neighborhoods) through the following actions, which are aimed at providing an increased supply of affordable units throughout the city, thereby increasing access to resources and facilitating housing mobility opportunities for lower-income households:

- Continue to implement the public education program advertising the opportunity for ADUs by updating informational handouts and brochures about ADUs that are available on the City's website and at the public counter annually, or as needed to reflect changes in State law. Reach out directly with the informational materials to homeowners particularly in predominantly single-family neighborhoods with higher median incomes, such as the Riverbottom neighborhood.
- Provide informational materials on ADU opportunities to all discretionary land use applicants.
- At least annually, publish informational materials pertaining to ADUs through a combination of media, including the City's social media accounts and direct mailing.

 By December 2024, identify and implement incentives for construction of ADUs with new development, which may include differing collection times for impact fees for the square footage associated with the ADU.

Financing:	General Fund
Time Frame:	Update ADU materials annually, or as needed to reflect changes in State law, and identify and implement incentives for construction by December 2024.
Implementation Responsibility:	Community Development Department (Planning Division)
Quantified Objective:	Encourage construction of 20 ADUs for lower-income households, 20 for moderate-income households, and 10 for above moderate-income households particularly in predominantly single-family neighborhoods with higher median incomes, such as the Riverbottom neighborhood, to reduce concentrations of lower-income households (e.g., in the City Center East, South Columbia/East Early Avenue, and Duff and Buttonwillow neighborhoods) to improve housing mobility opportunities and reduce displacement risk.
Relevant Policies:	Policy 1.3, Policy 2.1, Policy 2.6

Program 13: Replacement Units

To reduce displacement risk and in accordance with California Government Code Section 65583(g), the City will require replacement housing units subject to the requirements of California Government Code Section 65915(c)(3) on sites identified in the sites inventory 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;
- Vacant sites with previous residential uses that have been vacated or demolished.

Financing:	General Fund
Time Frame:	Ongoing, the replacement requirement will be implemented immediately and applied as applications on identified sites are received and processed.
Implementation Responsibility:	Community Development Department (Planning Division)
Relevant Policies:	Policy 3.3, Policy 3.6

Program 14: Housing for a Variety of Needs

The City will encourage a variety of housing types to address the housing needs of a variety of household types, sizes, and incomes. This could include duplexes, townhomes, apartment buildings, and condominiums in neighborhoods and new subdivisions and will identify and implement innovative and alternative housing options that provide greater flexibility and affordability in the housing stock while promoting mixed-income development. This may include consideration for further reduction in regulatory barriers for community land trusts, tiny houses, microhomes, cottage homes, small lot subdivisions, and other alternative housing types, as well as exploration of a variety of densities and housing types in all zoning districts.

The City will use the findings of this program to target development of a variety of housing types in areas of predominantly single-family development and of concentrated overpayment to reduce displacement risk, promote inclusion, and support integration of housing types based on income.

Financing:	General Fund
Time Frame:	Identify and implement innovative and alternative housing options to help further housing production by December 2025; amend the Zoning Ordinance as needed.
Implementation Responsibility:	Community Development Department (Planning Division)
Quantified Objective:	Encourage development of 30 lower-income units, 30 moderate-income units, and 10 above moderate-income units in a variety of sizes to reduce displacement risk for all residents and facilities in income-integrated neighborhoods in areas of predominantly single-family development and of concentrated overpayment.
Relevant Policies:	Policy 1.2, Policy 2.1, Policy 4.4

Removal of Governmental Constraints

Program 15: Zoning Code Amendments

The City will amend the Municipal Code to address the following development standards and barriers to special-needs housing opportunities:

 Parking Standards: The City will reduce parking standards for multifamily dwellings to mitigate possible constraints on development.

- **Density Bonus:** Adopt a Density Bonus provision in 2023 to comply with California's density bonus law (California Government Code Section 65915, as revised) and promote the use of density bonuses for lower-income units by providing information through a brochure in City buildings and on the City's website.
- Accessory Dwelling Units: Amend the Zoning Code to be consistent with the latest State legislation related to ADUs, ensuring that ADUs are permitted in all zones that permit single-family or multifamily uses, and permit the construction of a junior accessory dwelling unit (JADU) on each lot in addition to an ADU, in accordance with California Government Code Section 65852.2.
- Emergency Shelters: Amend the definition of emergency shelter to include other interim interventions, including but not limited to, navigation centers, bridge housing, and respite or recuperative care. Develop managerial standards for emergency shelters and allow 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)(A)(ii)).
- 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 by-right in zones where mixed uses are allowed or in nonresidential zones that permit multifamily housing (Government Code Section 65662; AB 101).
- Residential Care Facilities: Allow residential care facilities for six or fewer persons, in accordance with Health and Safety Code Section 1568.0831, and allow residential care facilities, regardless of size, in all zones that permit residential uses of the same type, in accordance with the City's definition of family.
- Employee Housing: Treat employee/farmworker housing that serves six or fewer persons as a single-family structure and permit it in the same manner as other single-family structures of the same type within the same zone across all zones that allow single-family residential uses. Treat employee/farmworker housing consisting of no more than 12 units or 36 beds as an agricultural use and permit it in the same manner as other agricultural uses in the same zone, in compliance with the California Employee Housing Act, and allow for a streamlined, ministerial approval process for projects on land designated as agricultural or land that allows agricultural uses (Health and Safety Code Sections 17021.5, 17021.6, and 17021.8).
- Amending Permitted Uses and Removing Site Area Requirements: As part of the zoning ordinance amendment, the City will amend the RM-2 and RM-3 zones by to removing single-family as a permitted use and removing the site area per dwelling unit requirements in Section 10-6C-5 of the City's Municipal Code.

- Transitional and Supportive Housing: To comply with AB 2162, the City will amend its code to permit supportive housing by-right in the UR, CA-O, CN, CC, CS, and ML zones. Additionally, it will amend its code to consider both transitional and supportive housing a permitted use in all zones allowing residential uses.
- Zoning Clean Up: When the City adopted the 2030 General Plan, the City incorporated policies from the 2008 Reedley Specific Plan into the General Plan. Such policies include properties that are zoned RM-SP are required to be consistent with the High Density Residential General Plan Designation and RM-2 zone district. Since there are fewer than 20 parcels in the City zoned as RM-SP, per **Program**, 15, the City will remove RM-SP from the zoning map. Affected parcels will be zoned RM-2.
- Rezoning to Address the RHNA: To address the 2023-2031 RHNA, amend the General Plan and/or Zoning Code, to provide adequate sites for at least 586 lower-income units. Redesignating and rezoning parcels with APNs 3704310, 36338045, 36329117, 36338047, and 37012238 in Table 1L-5 will address the shortfall of suitably designated and zoned sites to address the lower-income RHNA. The allowed base density in the land use designation and zoning district will be amended to permit 29 dwelling units per acre on the site zoned CC and 21.78 dwelling units per acre on sites zoned RM-2, with a minimum density of 20 dwelling units per acre on all sites. With the proposed allowed density, each site will permit at least 16 units on the site. At least half of these sites shall be designated for residential use only. The exception to this requirement is that lower income housing needs may be accommodated on sites designated mixed-use if those sites allow 100-percent residential use and require that residential uses occupy at least 50 percent of the total floor area of a mixed-use project. The redesignation and rezoning of the parcels to address the lower income shortfall must be completed within three years of the beginning of the 6th Cycle Housing Element planning period, which is December 31, 2026.

Financing:	General Fund
Time Frame:	Adopt Density Bonus provision in 2023 and complete remaining Zoning Ordinance amendments by December 2025, except the rezoning to address the RHNA which will be completed by December 31, 2026. Annually review the effectiveness and appropriateness of the Zoning Ordinance and process any necessary amendments to remove or mitigate potential constraints to the development of housing.
Implementation Responsibility:	Community Development Department
Relevant Policies:	Policy 1.1, Policy 2.7, Policy 5.2

Program 16: Reasonable Accommodations and Universal Design

The City will develop and formalize a general process that a person with physical and developmental disabilities can use to make a reasonable accommodation request to accommodate the needs of persons with disabilities and streamline the permit review process. The City will provide information to individuals with disabilities regarding reasonable accommodation policies, practices, and procedures based on the guidelines from HCD. This information will be available through postings and pamphlets at the public counter and on the City's website.

The City will also implement State requirements (Sections 4450 to 4460 of the California Government Code and Title 24 of the California Code of Regulations) to include accessibility in housing and public facilities for persons with disabilities:

- Encourage housing developers to include mobility-impaired accessibility in their project
 designs and prioritize these types of projects to increase housing mobility opportunities for
 seniors and persons with disabilities particularly in higher-opportunity areas such as the
 southwest, far north, and far east sides of the city
- Review regulations and procedures for City-funded or operated housing programs to ensure that they do not exclude participation by persons with disabilities.
- Include accessibility considerations in the preparation of the City's capital improvement plan and the allocation of funding for capital improvements in support of housing and residential neighborhoods for persons with physical or developmental disabilities.

Financing:	General Fund, SB 2 Grant Funding, LEAP Grant Funding
Time Frame:	Develop and adopt a reasonable accommodations ordinance by December 2024; create brochures on universal design and the reasonable accommodations ordinance by July 2025 and update biannually, or as needed.
Implementation Responsibility:	Community Development Department
Quantified Objective:	Assist five residents with reasonable accommodation requests to reduce displacement risk and encourage three accessible units to improve housing mobility.
Relevant Policies:	Policy 4.1, Policy 4.5

Program 17: Monitoring of Planning and Development Fees

The City charges various fees to review and process development applications. Such fees may add to the cost of housing development. The City will analyze housing-related development fees, particularly for multifamily housing, on an annual basis to ensure they do not unduly constrain development. As part of the analysis process, meet with multifamily developers at least once by December 2024 to request input regarding constraints associated with fees. Based on feedback received, reduce fees if found to be a constraint. Further, the City will offer deferred or reduced fees to facilitate affordable housing development, as appropriate.

Financing:	General Fund
Time Frame:	Meet with multifamily developers by December 2024 and revise fees by bringing an updated fee schedule to the City Council, if necessary, by December 2025. Review fees annually.
Implementation Responsibility:	Community Development Department, City Council
Quantified Objective:	Facilitate construction of 150 multifamily units during the planning period by ensuring fees do not pose a barrier to construction; encourage missing-middle development in higher-resource areas and at least 50 of the units to be affordable to lower-income households.
Relevant Policies:	Policy 1.2, Policy 1.4

Program 18: Preliminary Applications (SB 330) and Streamlined Approval (SB 35)

The City will continue to offer preliminary application reviews, 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 will be available on the City's website for developers interested in pursuing the streamlined process or vesting rights.

Financing:	General Fund
Time Frame:	Develop an SB 35 streamlined approval process by June 2025 and implement as applications are received.
Implementation Responsibility:	Community Development Department
Quantified Objective:	Facilitate construction of 10 very low-income units and 10 low-income units to increase housing mobility opportunities, prioritizing new opportunities in

	higher-resource areas such as the southwest, far north, and far east sides of the city
Relevant Policies:	Policy 1.4, Policy 2.3, Policy 2.4

Program 19: Objective Design Standards

The City will develop objective design guidelines and standards to provide clear and objective standards related to single-family, multifamily, and mixed-use residential developments. The objective design standards will apply to all multifamily development projects.

Financing:	General Fund
Time Frame:	Adopt objective design standards by December 2025 and implement thereafter.
Implementation Responsibility:	Community Development Department
Quantified Objective:	Facilitate streamlined construction of 50 units over the planning period through objective standards; of these, 25 units in higher-opportunity areas to promote access to resources and mobility for target households.
Relevant Policies:	Policy 1.8, Policy 2.7

Housing Quality

Program 20: Fresno County Housing Assistance Rehabilitation Program (HARP)

This program provides loans to qualifying homeowners, including owners of mobile or manufactured homes, in the unincorporated county and participating cities for the improvement of their homes. The City of Reedley is a participating jurisdiction. Eligible improvements include energy-efficiency upgrades and installations, health and safety and hazard corrections, and accessibility modifications to reduce displacement risk and facilitate place-based revitalization. Loan terms under this program vary according to household income and the improvements and repairs that are needed. The City will:

- Promote available housing rehabilitation resources on the City's website and at public counters.
- Conduct targeted outreach to inform property owners of rehabilitation assistance in neighborhoods with older housing units, such as the City Center East, City Center West, and S. Columbia/E. Early Avenue neighborhoods.
- Refer interested households to County program.
- Target promotion in areas of need through the City's Quarterly Newsletter and other outreach
 methods to assist in reducing displacement risk for residents by improving living conditions
 and enabling them to stay in their home and community.

Financing:	CDBG and HOME funds
Time Frame:	Update materials every other year, or as new information is provided by the County, and send out to targeted promotion areas, such as the City Center East, City Center West, and S. Columbia/E. Early Avenue neighborhoods, annually.
Implementation Responsibility:	Fresno County Public Works and Planning Department, Community Development Division, and City of Reedley
Quantified Objective:	Connect at least 20 lower-income households with rehabilitation resources during the planning period. Facilitate rehabilitation of five housing units, three of these in areas of concentrated poverty or areas with older housing stock, such as the City Center East, City Center West, and S. Columbia/E. Early Avenue neighborhoods, to facilitate place-based revitalization.
Relevant Policies:	Policy 3.2, Policy 4.1

Program 21: Fresno County Rental Rehabilitation Program (RRP)

This program provides no-interest loans to qualifying property owners in the unincorporated county and participating cities for making improvements to their rental properties to reduce displacement risk for renters and to facilitate place-based revitalization. The City of Reedley is a participating city in the RRP and provides information to property owners. Eligible improvements include repairing code deficiencies, completing deferred maintenance, lead-based paint and asbestos abatement, heating, ventilation, and air conditioning (HVAC) repairs, energy-efficiency upgrades, accessibility modifications, and kitchen and bathroom upgrades. The City will:

- Promote available housing rehabilitation resources on the City's website and at public counters.
- Refer interested property owners to County program.
- Target promotion in areas of concentrated renter households or older housing stock through the City's Quarterly Newsletter and other outreach methods to assist in reducing displacement risk for residents by improving living conditions and enabling them to stay in their home and community.

Financing:	HOME funds
Time Frame:	Update materials every other year, or as new information is provided by the County, and send out targeted promotions annually.
Implementation Responsibility:	Fresno County Public Works and Planning Department, Community Development Division, and City of Reedley

Quantified Objective:	Connect at least 25 property owners with rehabilitation resources during the planning period. Facilitate rehabilitation of 10 rental units, five of these in areas of concentrated poverty or concentration of renters, such as in central Reedley and the northeast side of the city, to facilitate place-based revitalization.
Relevant Policies:	Policy 3.2, Policy 4.1

Program 22: Code Enforcement

The Fire Department will continue to use proactive code enforcement and substandard abatement processes to bring substandard housing units and residential properties into compliance with City codes. The Fire Department will also refer income-eligible households to County housing rehabilitation programs for assistance in making the code corrections. Targeted efforts to improve housing conditions in areas of need will facilitate place-based revitalization and assist in reducing displacement risk for residents by improving living conditions and enabling them to remain in their home and community.

To address existing conditions in farmworker housing, the City's Fire Department, which is responsible for code enforcement, will conduct outreach at least twice during the planning period to any housing known to serve farmworkers to review conditions and will provide information about available rehabilitation funding programs as needed.

Financing:	General Fund
Time Frame:	Make informational materials on rehabilitation assistance programs available by January 2024, or as new information is provided by the County, to be provided on an ongoing basis when violations are confirmed, conduct code enforcement as complaints are received. Conduct code enforcement/rehabilitation outreach to farmworker housing at least twice during the planning period.
Implementation Responsibility:	Fire Department and Community Development Department (Building Division)
Quantified Objective:	Reduce displacement risk and encourage place-based revitalization by facilitating rehabilitation of 10 units by providing informational materials to owners in violation of City codes on available assistance programs and annually promote available assistance programs in areas of concentrated lower-income households including in the downtown, southeast, and northeast sides of the city. Facilitate rehabilitation of 5 units of farmworker housing.
Relevant Policies:	Policy 3.1, Policy 3.3

Housing Assistance

Program 23: Fresno County Homebuyer Assistance Program

City of Reedley participates in the County's Homebuyer Assistance Program (HAP), which is administered through the Fresno County Housing Authority. To reduce displacement risk of homeowners being priced out of the community and to facilitate housing mobility opportunities, this program assists lower-income families with purchasing their first home by providing a zero-interest, deferred payment loan that does not exceed 20 percent of the purchase price of the single-family residence (plus loan closing costs). Households earning up to 80 percent of the area median income (AMI) in unincorporated Fresno County and participating cities are eligible for this program. The City will:

- Promote available homebuyer resources on the City's website and at public counters.
- Refer interested households to the County program with the goal of assisting four households.
- Promote the availability of this program, particularly in areas with concentrations of renters, particularly lower-income renters, by providing multilingual informational materials at public buildings and community locations and will post the program on the City's website.

Reedley residents also have access to a number of homebuyer assistance programs offered by the California Housing Finance Agency (CalHFA), through the Fresno County Public Works and Planning Department, Community Development Division.

- Mortgage Credit Certificate (MCC): The MCC Tax Credit is a federal credit that can reduce potential federal income tax liability, creating additional net spendable income that borrowers may use toward their monthly mortgage payment. This MCC Tax Credit program may enable first-time homebuyers to convert a portion of their annual mortgage interest into a direct dollar-for-dollar tax credit on their U.S. individual income tax returns.
- <u>CalPLUS Conventional Program:</u> This is a first mortgage loan insured through private mortgage insurance on the conventional market. The interest rate on the CalPLUS Conventional is fixed throughout the 30-year term. The CalPLUS Conventional is combined with a CalHFA Zero Interest Program (ZIP), which is a deferred-payment junior loan of three percent of the first mortgage loan amount, for down payment assistance.
- CalHFA Conventional Program: This is a first mortgage loan insured through private mortgage insurance on the conventional market. The interest rate on the CalHFA Conventional is fixed throughout the 30-year term.

The City will promote all available homebuyer resources on the City's website and at public counters and will annually review funding resources available at the state and federal levels and pursue as appropriate to provide homebuyer assistance.

Financing:	General Fund, HOME funds
Time Frame:	Ensure informational materials on all homebuyer resources are on the City's website and available at public counters by June 2024. Update materials annually, or as new information is provided by the County, and send out targeted promotion at least every other year.
Implementation Responsibility:	Fresno County Public Works and Planning Department, Community Development Division
Quantified Objective:	Connect 20 prospective homebuyers with the County program to facilitate housing mobility opportunities in the city. Outreach will be focused on lower-income areas of the city with a higher concentration of qualifying households, including the north and east sides of the city, as well as parts of the downtown area.
Relevant Policies:	Policy 2.1, Policy, 2.4, Policy 2.5, Policy 2.8

Program 24: Energy Conservation

The City will continue to promote energy conservation in housing development and rehabilitation:

- Establish a high-efficiency washing machine/dryer rebate program for Reedley residents by December 2024.
- Continue to promote California HERO and YGRENE programs by providing links on the City website and making brochures available at City counters.
- Continue to promote and support Pacific Gas and Electric Company programs that provide energy-efficiency rebates for qualifying energy-efficient upgrades by providing a link on the City website and making brochures available at City counters.
- Expedite review and approval of alternative energy devices (e.g., solar panels).
- Assist lower-income households with energy efficiency through the County's Housing Assistance Rehabilitation Program.
- Encourage developers to be innovate in designing energy-efficient homes and improving the energy efficiency for new construction.

Financing:	General Fund
Time Frame:	Make information easily available on the City's website and at public facilities by June 2025.
Implementation Responsibility:	Community Development Department

Quantified Objective:	Assist five low-income residents annually in need of assistance with energy-efficiency improvements to reduce displacement risk due to housing costs.
Relevant Policies:	Policy 6.1, Policy 6.2, Policy 6.3

Program 25: Housing Choice Vouchers

The Housing Choice Voucher (HCV) Program extends rental subsidies to extremely low- and very low-income households, including families, seniors, and the disabled. The program offers a voucher that pays the difference between the current fair market rent (FMR) as established by the United States Department of Housing and Urban Development (HUD) and what a tenant can afford to pay (i.e., 30 percent of household income). The Fresno Housing Authority administers the HCV program in Fresno County.

- Provide a link to the Fresno Housing Authority's HCV program webpage on the City's website by February 2024.
- Meet with the Fresno Housing Authority by June 2024 to discuss the process of developing printed informational materials, with the goal of making materials available at public counters by June 2025.
- Work with the Housing Authority to disseminate information to landlords and property owners on incentives for participating in the HCV program throughout the city to promote housing opportunities for all residents.
- Refer interested households to the Fresno Housing Authority and encourage landlords to register their properties with the Housing Authority for accepting HCVs.

To encourage housing mobility, targeted additional outreach to landlords and property owners will be made in higher-opportunity areas, including the Riverbottom neighborhood along the Kings River just south of Reedley College; the River Ridge neighborhood; and the Reedley Estates, Kingswood Estates, Frankwood Heights, and Hollywood neighborhoods in northern Reedley.

Financing:	HUD Section 8
Time Frame:	Provide information on the City's website by February 2024. Meet with the Housing Authority by June 2024 and develop informational materials by June 2025. Target outreach to property owners and landlords at least annually.
Implementation Responsibility:	Fresno Housing Authority

Quantified Objective:	Work with the Fresno Housing Authority to encourage landlords and property managers in Reedley to offer make units available for 100 units serving lower-income households using HCVs, at least 75 percent of which will be in high-opportunity areas to promote access to resources and mobility for target households.				
Relevant Policies:	Policy 2.2				

Program 26: Housing Discrimination Monitoring and Referral

The Fresno Housing Authority publicizes all information related to housing opportunities, programs fair-housing information and assistance in English, Spanish, Hmong, French, German, Chinese, Arabic, Dutch, Italian, Korean, Portuguese, and Russian. However, while all public notices and information on the Housing Authority website are translated to all of the previously mentioned languages, general circulation of information and secondary links, such as applications, are available only in English. The City will coordinate with the Housing Authority, Fresno Council of Governments (FCOG), and other Fresno County jurisdictions to develop Spanish-language printed materials to improve accessibility to fair housing resources for residents. If additional languages become more prevalent in the county, materials will be translated into those languages as needed.

The City will also:

- Establish a procedure to refer residents with fair housing questions or issues to the Fair Housing Council of Central Valley (FHC-CC), California Rural Legal Aid (CLRA), and other fair housing organizations.
- Provide fair housing information on the City's website and in printed materials available in public buildings in both English and Spanish.
- Coordinate with local fair housing service providers to conduct biannual trainings for landlords and tenants on fair housing laws, rights, and responsibilities and ongoing access to legal counseling.

Financing:	General Fund, grant funding					
Time Frame:	Either individually or as part of the Countywide Housing Element Technical Committee (Program 1), meet annually with FC-CC to discuss fair housing issues and opportunities for education. Assist the Housing Authority to translate fair housing materials and resources into Spanish by December 2024. Make fair housing information available on the City's website and in public buildings by June 2025. Coordinate with fair housing providers to conduct biannual trainings for landlords and property owners.					

Implementation Responsibility:	Community Development Division or Countywide Housing Element Technical Committee, Fresno Housing Authority					
Quantified Objective:	Reduce displacement risk for 20 individuals or families resulting from language barriers and 10 from discrimination by landlords or property owners.					
Relevant Policies:	Policy 5.1					

Program 27: Improve Access to Resources

The City shall take the following actions to encourage place-based revitalization improve access to resources and opportunities citywide, but with a particular emphasis on neighborhoods with a concentration of lower-income residents who often face additional barriers in accessing resources:

- Work with Fresno County Rural Transit Agency (FCRTA) and other jurisdictions in the county to develop a fact sheet, or similar informational materials, of FCTA programs to be posted on the City's website, social media, and in public buildings by January 2026, and advertised annually in the City's newsletter to help connect seniors and other residents to services in the city and throughout the county. Once informational materials are available, conduct targeted outreach in areas with higher rates of seniors and persons with disabilities within six months, including on the south side of the city and to age-restricted senior housing complexes.
- Prioritize projects that facilitate place-based revitalization through the City's Capital Improvement Plan (CIP), such as projects that improve public infrastructure in deteriorating or underserved areas. Review funding opportunities that will allow the City to fund projects currently listed as unfunded in the CIP to invest in community amenities such as water and sewer infrastructure, parks and recreation facilities or active transportation facilities on an annual basis and apply as they become available. Apply for funding for at least two community amenities projects during the planning period. Unfunded programs from the current CIP that may be funded through this program include:
- o Installing an ADA ramp at Camancho Park
- Sidewalks near Reedley High School, Lincoln School, Grant School, and/or Jefferson School
- o Replacement of playgrounds in Muller Park, Sports Park, and/or Citizens Park
- o Addition of water and storm drain pipes in residential areas within multiple neighborhoods
- O Upsizing sewer pipes, including on the city's west side
- Post information about flood-related resources on the City's website and provide public notices in utility bills or other direct methods to neighborhoods at risk of flooding, including the Riverbottom neighborhood and other areas adjacent to the Kings River, by January 2026. Connect 50 households with available flood-related resources during the planning period.

- Ensure program availability and funding announcements are made available in Spanish starting
 within six months of Housing Element adoption and translation is available at public meetings.
 Provide translation services as requested, at at least 10 public meetings during the planning
 period.
- Facilitate place-based revitalization and promote healthy environments for new housing by evaluating transitional buffers between residential and agricultural uses and highways and working with developers as projects are proposed to mitigate impacts associated with emissions from agricultural industries and traffic and facilitate access to healthy outdoor spaces. Identify environmental mitigation strategies on at least two projects during the planning period.
- Meet with school district representatives by June 2025 to analyze whether housing security poses a barrier to student achievement. Work with the school district to assist in securing grant funding for teacher recruitment and retention bonuses, classroom materials, and other incentives for teachers to facilitate positive learning environments citywide. If district representatives identify housing availability as a barrier to teacher retention, conduct a feasibility study to identify the funding that would be required to provide teacher housing or other housing incentives for teachers by June 2028.

Financing:	General Fund	
Time Frame:	Refer to each bulleted action for specific timeframes.	
Implementation Responsibility:	Community Development Department	
Quantified Objective:	Improve access to resources and reduce displacement risk resulting from a variety of factors for at least 30 residents including for neighborhoods at risk of flooding, including the Riverbottom neighborhood and other areas adjacent to the Kings River.	
Relevant Policies:	Policy 3.1, Policy 3.5, Policy 5.1, Policy 5.2	

Place-Based Revitalization

Program 28: Neighborhood Improvements

The City shall promote environmental justice and maintain and revitalize neighborhoods citywide, with a particular focus on areas of lower opportunity and concentrated poverty, including the north and east sides of the city, as well as parts of the downtown area. Targeted investment in neighborhood revitalization will focus on improving infrastructure, schools, employment, parks, transportation and other community amenities. The City shall adopt and implement an Active Transportation Plan and Parkway Master Plan in order to be more competitive in grant applications, as this will facilitate place-based revitalization through increased investment in transportation and parkways.

In order to address environmental disparities or negative environmental impacts, particularly related to air quality, the City will conduct citywide outreach to publicize available residential and commercial programs from non-City sources, such as the San Joaquin Valley Air Pollution Control District, on an annual basis. The City will also investigate the availability of additional funds and programs to mitigate air quality issues, particularly in buildings with low-income tenants and for low-income homeowners, as well as funding that can be used to incentivize air quality improvement strategies on projects with lower- or moderate-income units, such as the installation of green roofs. The City will seek this funding on an annual basis and apply as opportunities become available, then make funding available for the applicable strategy within six months of receipt. As is discussed in **Program 27**, the City will also study transitional buffer areas between residential uses and highways or agricultural uses to mitigate associated issues related to air quality and will identify environmental mitigation strategies on at least two projects during the planning period related to air quality issues.

The City shall implement strategies from its General Plan 2030, which was adopted in 2014, including:

- Community Health Policies LU 2.9.1 through LU 2.9.5 which strive to address neighborhoods that have been identified as lacking amenities by encouraging patterns of development, such as sidewalks and walking and biking paths that promote physical activity and discourage automobile dependency, increasing opportunities for physical activity, encouraging the development of parks and open space and providing adequate lighting for streets, parks, recreational facilities, sidewalks and bike paths to promote their use.
- Community Health Policies LU 2.9.6 through LU 2.9.16 which promote accessibility to healthy foods through various opportunities such as farmers markets, use of demonstration gardens at schools, churches, and other public facilities, and vacant city property for gardening of fruits and vegetables; as well as promote health through after-school youth activities, substance abuse and crime prevention programs and ensuring adequate land is designated to accommodate medical offices or expansion of the hospital.
- Conservation, Open Space, Parks and Recreation Policies COSP 4.4.1 through COSP 4.4.6 which address air quality through monitoring impacts, determining thresholds, considering cumulatively significant impacts, collaborating with San Joaquin Valley Air Pollution Control District (SJVAPCD), affected agencies and neighboring jurisdictions to address air quality issues and encourage innovative mitigation measures.

Additionally, the City will actively recruit residents from areas of concentrated poverty to serve on boards, committees, and task forces as vacancies are available, including the Planning Commission, Community Services, commission, and Measure G Oversight Committee to facilitate place-based revitalization by encourage representation from areas in high need of investment.

Time Frame:	Ongoing, per General Plan implementation. Implement strategies from other elements of the General Plan listed above on at least an annual basis. A list of specific projects that implement the above policies is updated annually during fiscal year budget and Capital Improvement Plan process. Send information to residents of areas of concentrated poverty, including the city's northeast and central areas, or host information sessions in these areas when board and commission vacancies become available. Adopt and implement an Active Transportation Plan and Parkway Master Plan by December 2024 in order to be more competitive in grant applications. Seek funding for air quality pollution mitigation features and programs on a bi-annual basis and apply as funds become available.	
Implementation Responsibility:	Community Development Department	
Quantified Objective:	Recruit two board or commission members from high-poverty areas within the planning period. Provide funding to incentivize air quality mitigation features on two projects with lower or moderate-income units during the planning period.	
Relevant Policies:	Policy 3.1, Policy 3.5	

Quantified Objectives

Quantified objectives estimate the number of units likely to be constructed, rehabilitated, or conserved/preserved by income level during the planning period based on optimal implementation of each program. The quantified objectives do not set a ceiling on development; rather, they set a target goal for the jurisdiction to achieve based on needs, resources, and constraints. Each quantified objective is detailed by income level, as shown in **Table 1L-1**.

Table 1L- 1 Quantified Objective Summary

Program	Extremely Low	Very Low	Low	Moderate	Above Moderate	
RHNA	201	202	183	211	666	
		New Constru	ction			
Program 7	201	202	183			
Program 8	15	15	10			
Program 9	30	30	20			
Program 10	201	202	183			
Program 12			20	20	10	
Program 14		10	20	30	10	
Program 17			50	70	30	
Program 18		10	10			
Program 19	10	10	20	10		
Rehabilitation						
Program 20	3	5	12			
Program 21	5	10	10			
Program 22		5	5			
Conservation						
Program 10	201	202	183			
Program 11			63			
Program 25	100					

Source: City of Reedley, February 2023

^{1.} In some cases, quantified objectives overlap and therefore identify multiple strategies to achieve the RHNA.

^{2.} Moderate- and above moderate-income unit capacity is anticipated to be met by market development trends.

APPENDIX 1L: CITY OF REEDLEY

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SECTION 1L-2: SITES INVENTORY

California law (Government Code Section 65583 (a)(3)) requires that the Housing Element contain an inventory of land suitable for residential development, including vacant sites that can be developed within the planning period and nonvacant (i.e., underutilized) sites having potential for redevelopment. State law also requires an analysis of the relationship of zoning and public facilities and services to these sites.

Regional Housing Needs Allocation

The Regional Housing Needs Allocation (RHNA) is the State of California—required process that seeks to ensure cities and counties are planning for enough housing to accommodate all economic segments of the community. The process is split into the following three steps.

- 1. **Regional Determination:** The California Department of Housing and Community Development (HCD) provides each region with a Regional Determination of housing need, which includes a total number of units split into four income categories. The City of Reedley is in the region covered by the Fresno Council of Governments (FCOG). HCD gave FCOG a Regional Determination of 58,298 units for the 6th cycle RHNA (2023-2031). This is the total number of units that the cities and counties in the FCOG region must collectively plan to accommodate.
- 2. **RHNA Methodology:** Councils of Governments (COG), including FCOG, are responsible for developing a RHNA methodology for allocating the Regional Determination to each city and county. This methodology must further specific State objectives, including but not limited to promoting infill, equity, and environmental protection; ensuring jobs-housing balance; and affirmatively furthering fair housing.
- 3. **Housing Element Updates:** Each city and county must then adopt a housing element that demonstrates how the jurisdiction can accommodate its assigned RHNA through its zoning. HCD reviews each jurisdiction's housing element for compliance with State law.

The City of Reedley's share of the regional housing need was determined by a methodology prepared by FCOG as part of the Regional Housing Needs Plan, adopted in November 2022. In accordance with FCOG's Regional Housing Needs Plan, the City must plan to accommodate a total of 1,463 housing units between July 30, 2023, and December 31, 2031. **Table 1L-2** shows the City's RHNA by income category. Of the 1,463 total units, the City must plan to accommodate 403 units for very low-income households, 183 units for low-income households, 211 units for moderate-income households, and 666 units for above moderate-income households.

Table 1L- 2 Regional Housing Needs Allocation, 2023-2031

Income Category	Allocation	Percentage	
Very Low*	403	27.5%	
Low	183	12.5%	
Moderate	211	14.5%	
Above Moderate	666	45.5%	
Total	1,463	100.0%	

Source: FCOG, 2022.

Availability of Land

State Housing Element law emphasizes the importance of adequate land for housing and requires that each Housing Element "...identify adequate sites ... to facilitate and encourage the development of a variety of housing types for all income levels..." (California Government Code Section 65583(c)(1)). To allow for an adequate supply of new housing, land must be zoned at a variety of densities to ensure that development is feasible for a wide range of income levels. The identified land must also have access to appropriate services and infrastructure, such as water, wastewater, and roads.

To demonstrate the City's capacity to potentially meet its RHNA, an adequate-sites inventory was conducted. The inventory must identify adequate sites that will be made available through appropriate zoning and development standards and with public services and facilities needed to facilitate and encourage the development of a variety of housing types for households of all income levels.

The analysis of the relationship of suitable sites to zoning provides a means for determining the realistic number of dwelling units that could actually be constructed on those sites in the current planning period.

Hazards and Other Potential Site Constraints

The Safety Element addresses the topic of public health and safety following State requirements in Section 65302(g) of the California Government Code. State law requires that the Safety Element contain background information and goals and policies to address multiple natural hazards, analyze the vulnerabilities from climate change and contain policies to improve climate change resilience, and assess residential areas with evacuation constraints. The City's Safety Element is contained in the City of Reedley General Plan 2030, which was updated in February 2014.

The Housing Element sites inventory was screened for the presence of the following hazard zones:

1. Federal Emergency Management Agency (FEMA), 100-year flood zone

^{*}It is assumed that 50 percent of the very low-income units are allocated to address extremely low-income need.

- 2. Department of Water Resources (DWR), Dam Inundation Zone
- 3. California Geological Survey, California Department of Conservation, landslide susceptibility
- 4. California Geological Survey, California Department of Conservation, liquefaction susceptibility
- 5. California Department of Forestry and Fire Protection (CAL FIRE), Fire Hazard Severity Zones (FHSZ)
 - a. State Responsibility Areas (SRA)
 - b. Local Responsibility Areas (LRA)

A very small portion of site 39 is located within a FEMA 100-Year Flood Zone and a Landslide Zone, as indicated in the environmental constraints column of **Tables 1N-6** and **1N-7**, due to its proximity to the Kings River, though the majority of the site is located outside of both zones. Additionally, many sites in Reedley are located within the Pine Flat Dam Inundation area, as the majority of the city area is within this dam inundation boundary. However, these conditions do not preclude development.

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, airport compatibility, and related land use controls, shape, contamination, easements, or overlays.

Sites Identified in Previous Housing Element

Pursuant to California Government Code Section 65583.2(c), a nonvacant site identified in the previous planning period and a vacant site identified in two or more previous consecutive planning periods cannot be used to accommodate the lower-income RHNA unless the site is subject to an action in the Housing Element that requires rezoning within three years of the beginning of the planning period that will allow residential use by right for housing developments with at least 20 percent units affordable to lower-income households. There are nine sites in the inventory that were identified in previous cycles. Four of these (sites 23, 24, 37, and 38) were used to meet the lower-income RHNA, and five (sites 34, 36, 39, 46, and 48) to meet the above moderate-income RHNA. Sites 23 and 24 have been identified again to meet the lower-income RHNA. Therefore, the City has included **Program 6**, which commits the City to allowing residential use by right on sites consistent with Government Code Section 65583.2(c) for housing developments in which at least 20 percent of the units are affordable to lower-income households.

Sites Appropriate for Lower-Income Housing

Housing Element law requires jurisdictions to provide an analysis showing that zones identified for lower-income households are sufficient to encourage such development. The law provides two options for preparing the analysis: (1) describe market demand and trends, financial feasibility, and recent development experience; or (2) use default density standards deemed adequate to meet the appropriate zoning test. According to State law (California Government Code Section 65583.2(c)(3)(B)), the default density standard for Reedley is 20 dwelling units per acre. The City has included several sites, listed in **Table 1L-5**,

that allow for densities up to 29 units per acre and are assumed to accommodate the City's lower-income RHNA.

The following assumptions were used to determine the income categories according to the allowed densities for each site:

- Lower-Income Sites. Sites at least 0.5 acres in size that allow at least 20 units per acre were inventoried as feasible for lower-income (low- and very low-income) residential development. This includes sites zoned CC, RM-SP, and RM-2, which allow for up to 29 units per acre in the CC zone and 21.78 units per acre in the residential zones.
- Moderate-Income Sites. Sites that are zoned RM-3, CN, or LI, allowing up to 14.52 and 15 units per acre. These areas were inventoried as feasible for moderate-income residential development. Typical dwelling units include small- and medium-sized apartments and other attached units. Sites that are smaller than 0.5 acres and zoned for CC or RM-2 were deemed too small to be feasible for lower-income development and have instead been assumed to be suitable for moderate-income development.

HUD considers a household's housing costs to be affordable if they are no more than 30 percent of the household's income. According to HCD's income limits for 2022, at the moderate-income level (earning between 81 and 120 percent of AMI), monthly rental costs are considered affordable if they are:

- o \$1,686 or less for one-person households,
- o \$1,928 or less for two-person households,
- o \$2,168 or less for three-person households, and
- o \$2,409 or less for four-person households.

As shown in Table IL-3 in an online survey of rental listings in November 2023, multiple listings were found for 2 and 3-bedroom apartments or houses. Only one 1-bedroom example (for an apartment complex) and one 4-bedroom home were found. The 1 bedroom apartments were renting for \$1,094. The average rent of 2-bedroom units was \$1,560. The average rent of 3-bedroom units was \$1,987. The 4-bedroom home was listed for \$2,500. The regional Housing Needs Assessment includes Table 2-23 Residential Rental Rate Comparison with the average rental rate for Fresno County in 2021 of \$1,697 and Based on this analysis, it is reasonable to assume that at least 94 units will be affordable to moderate-income households at a market-rate.

Table 1L- 3 Rental Survey

Unit Size	Unit Size 1 bedroom		3 bedroom	4 bedroom	
	\$1,094	\$1,325	\$2,400	\$2,500	
		\$1,601	\$1,695		
		\$1,628	\$1,900		
		\$1,685	\$1,840		
			\$2,100		
Average price per month	\$1,094	\$1,559.75	\$1,987	\$2,500	

Source: Zillow.com, Realtor.com, Homes.com, Facebook.com., Rentals.com, and Movoto.com, November 2023

 Above Moderate-Income Sites. Sites within zones that allow only single family homes at lower densities were inventoried as above moderate-income units. This includes sites with Low Density Residential land use designations.

Realistic Capacity

In determining the realistic capacity for the City's inventory of sites, the City considered land use controls and site improvements and assumed an 80 percent adjustment on residentially zoned sites to reflect developable acreage due to on-site improvements, including sidewalks, utility easements, and infrastructure improvements (roadway access, water, sewer, and stormwater). All sites are served by or planned to be served by infrastructure, with no constraints identified that would reduce capacity beyond the 80 percent adjustment. To further determine an appropriate realistic capacity assumption, the City considered and evaluated the implementation of its current multifamily development standards (e.g., setbacks, building height, parking, density requirements, land use controls, water and wastewater access, and open space requirements) as well as project examples to determine approximate density and unit capacity so as to not over-project unit potential. After considering the 80 percent adjustment factor, average 94 percent buildout of all project examples, and 98 percent buildout of mixed-use projects, the City decided to take a conservative approach and assume an 80 percent capacity on all residentially zoned sites in **Table 1L-5**.

Mixed-Use Zones

In Reedley, the PO, C-AO, CN, CC, and CS zoning districts allow vertical and horizontal mixed-use development by right. The ML district allows mixed use development with a conditional use permit. The CN, CC, and ML zoning districts have vacant land and are included in the sites inventory. The City reviewed the sites with zoning that allows non-residential uses in the City's currently adopted Housing Element (2015-2023) in addition to other sites with this type of zoning where residential has been built or approved and compared that with current uses on the site. The details about the sites analyzed are below:

• 37 parcels that allow non-residential uses were in the existing Housing Element inventory or are developed or approved with residential units in the city.

- o 27 of those parcels have approved or built projects on them since adoption of the current 5th cycle Housing Element. There has been no change to the remaining 10 parcels.
- o 23 of the parcels have built or planned non-residential uses on them.
- o 4 of the parcels have built or planned residential uses on them:
 - One is built with all affordable residential units, except one manager unit and is not mixed use.
 - Two others are mixed use with 94% and 95% residential (see additional detail a couple paragraphs below this one).
 - The fourth is mixed use with about half residential development.
- The 23 parcels with non-residential uses make up 62 percent of the list of the 37 sites that allow non-residential uses. The trends indicate that this type of site is more likely to develop with non-residential uses, at least based on recent trends since 2016.

This analysis resulted in the identification of a need to adjust realistic capacity assumptions on this type of site. Therefore, the revised assumptions for these areas are:

- In the CN zone district a mixed-use project is a "by right" use and the integrated residential use must be developed in accordance with the medium density residential general plan land use designation (8 to 15 dwelling units per acre). These sites were inventoried as moderate income at 7.6 percent of the maximum allowed density, which represents 4 sites out of 27 multiplied by 15 divided by 29.
- In the CC zone district a mixed-use project is a "by right" use and the integrated residential use must be developed in accordance with the high density residential general plan land use designation (15 to 29 dwelling units per acre). Based on recent development trends in the CC zone, these sites were inventoried as lower income at 7.6 percent of the maximum allowed density, which represents 4 sites out of 27 multiplied by 15 divided by 29.
- The ML zoning district allows for mixed and residential uses with a conditional use permit. The Reedley Municipal Code stipulates that residential projects in the ML district must be a minimum of 8 units per acre for sites 4 to 10 acres in size, a minimum of 15 units per acre for sites 11 to 15 acres in size, and a minimum of 20 units per acre for sites over 15 acres in size. The inventory assumes that the sites zoned ML, will be inventoried at 7.6 percent of the maximum allowed density.

While mixed-use projects in Reedley cannot be 100 percent residential, the minimum nonresidential requirement is just 1 percent of the total project. Therefore, a project can build out as primarily residential. As shown in **Table 1L-4**, recent mixed-use projects in Reedley have typically been approved and built out at an average of 98 percent of the allowable units. All mixed-use projects listed in **Table 1L-4** are primarily residential. Reedley I includes only 2,500 square feet of non-residential space, 1,500 square feet of which are proposed to be a community room. Similarly, the Kashian Student Housing project includes only 3,500 square feet of non-residential space for a clubhouse and leasing office and the Kashian Workforce Housing project includes only 2,885 square feet of non-residential space, 2,000 square feet of which is planned for a clubhouse and leasing office and 885 square feet for retail or food service. Assuming a conservative average of 800 square feet per residential unit, Reedley I would be 94.1 percent residential, Kashian Student Housing would be 93.2 percent residential, and Kashian Workforce Housing would be 95.1 percent residential.

Table 1L- 4 Realistic Capacity Project Examples

Project Name	Affordability	Acres	Project Status	General Plan / Zoning	Total Project Units	Max. Allowable Units	Realistic Capacity
City of Reedley							
Kashian Mixed- Use: Workforce Housing	Market Rate	2.11	Approved 2022	CC / CC	70	61	115%
Reedley I Mixed Use	Lower-Income	4.25	Approved 2022	LI / ML	80	63	127%
Guardian Village	100% AMI	1.92	Approved 2022	HDR / RM-2	48	41	117%
El Valle Apartments	Market Rate	0.83	Approved 2017	HDR / RM-2	20	18	111%
Paseo 55 (previously Trailside Trails) Mixed Use Project	100% AMI	1.76	Constructed 2016	CC / CC	55	51	108%
Reedley Family Apartments ¹	100% AMI	3.66	Phase 1 Constructed 2014 Phase 2 Constructed 2021	HDR / RM-2	80	79	101%
King River Commons	100% AMI	4.35	Constructed 2014	HDR / RM-2	60	94	64%
Orchard View Apartments	Moderate- Income	2.6	Constructed 2011	HDR /RM-SP	64	56	114%
Approved Project No. 2022-05	Mixed Use – residential is for Lower	18.79	Approved 2023	CC / CC	72	544	13%
City of Kingsburg							
Linnaea Villas Senior Housing	Mixed (Lower/ Market Rate)	4.84	Completed 2022	MD / RM-3 ²	42 Lower, 5 Market Rate	72	65%
						Average	94%
				Mixed	-Use Avera	ge (CC / CC)	79%

Source: City of Reedley, 2023.

¹ Phase 1 and 2 were originally approved in 2008. However, due to funding challenges, the phases were delayed and built in 2014 and 2021.

² Similar development standards to Reedley's RM-3 zone.

Vacant Land Inventory

The City prepared an inventory of vacant sites available to accommodate the City's RHNA. **Table 1L-5** provides the characteristics of each site, including zoning, General Plan designation, acreage, and realistic capacity for the sites currently zoned for housing at varying densities. **Figure 1L-1** maps the location of each site in the city. Sites that have been included in two previous Housing Element inventories are noted in **bold**.

Table 1L- 5 Vacant Land Inventory

Site No.	APN	GP Des.	Zoning	Min. Density	Max. Density	Parcel Size (acres)	Max. Capacity	Realistic Capacity	Affordability	Constraints/Notes
1	36307049	CC	CC	15	29	7.07	205	71 Lower 1 Moderate	Lower/ Moderate	No constraints; Realistic unit capacity based on approved project on this site
		CN	CN	8	15	1.18	17	1	Moderate	
2	37005049	LDR	R-1.6	4.1	7.27	0.61	4	3	Above Moderate	Dam Inundation Zone
3	36802163S	CC	CC	15	29	1.73	50	3	Lower	Dam Inundation Zone
4	36802165	CC	CC	15	29	0.62	17	1	Lower	Dam Inundation Zone
5	37020201	CC	CC	15	29	0.53	15	1	Lower	Dam Inundation Zone
6	37042701	CN	CC	15	29	0.34	9	1	Moderate	Dam Inundation Zone
7	37010005	CC	CC	15	29	0.24	6	1	Moderate	Dam Inundation Zone
8	37010076	CC	CC	15	29	0.32	9	1	Moderate	Dam Inundation Zone
9	37043101	CC	CC	20	29	1.85	53	4	Lower	Dam Inundation Zone
10	37026606	HDR	RM-SP	15	21.78	0.92	20	16	Lower	Dam Inundation Zone
11	37042407	HDR	RM-SP	15	21.78	0.8	17	13	Lower	Dam Inundation Zone
12	37042214	HDR	RM-SP	15	21.78	0.56	12	9	Lower	Dam Inundation Zone
13	37026415	HDR	R-1-SP	4.1	7.27	0.31	2	1	Above Moderate	Dam Inundation Zone
14	37040030	HDR	RM-SP	15	21.78	0.43	9	7	Moderate	None
15	37040031	HDR	RM-SP	15	21.78	0.41	8	6	Moderate	None
16	37040032	HDR	RM-SP	15	21.78	0.41	8	6	Moderate	None
17	37042215	HDR	RM-SP	15	21.78	0.4	8	6	Moderate	Dam Inundation Zone
18	36311084	HDR	RM-2	15.1	21.78	4.26	92	74	Lower	Dam Inundation Zone
19	36311085	HDR	RM-2	15.1	21.78	3.14	68	54	Lower	None
20	36518135T (portion)	HDR	RM-2	15.1	21.78	2.66	57	46	Lower	None
21	37013129	HDR	RM-2	15.1	21.78	2.44	53	42	Lower	Dam Inundation Zone
22	36829215	HDR	RM-2	15.1	21.78	0.688	14	11	Lower	Dam Inundation Zone

Site No.	APN	GP Des.	Zoning	Min. Density	Max. Density	Parcel Size (acres)	Max. Capacity	Realistic Capacity	Affordability	Constraints/Notes
23	37009112	HDR	RM-2	15.1	21.78	0.38	8	6	Moderate	Dam Inundation Zone
24	36818303	HDR	RM-2	15.1	21.78	0.172	3	3	Above Moderate	Dam Inundation Zone; Realistic unit capacity based on approved project on this site
25	36818302	HDR	RM-2	15.1	21.78	0.16	3	3	Above Moderate	Dam Inundation Zone; Realistic unit capacity based on approved project on this site
26	36818301	HDR	RM-2	15.1	21.78	0.063	1	2	Above Moderate	Dam Inundation Zone; Realistic unit capacity based on approved project on this site
27	36823311	LDR	RM-3	8.1	14.52	0.18	2	1	Moderate	Dam Inundation Zone
28	36338045	HDR	RM-2	20	21.78	2.16	47	37	Lower	Dam Inundation Zone
		MDR	RM-2	8.1	15	1.79	26	21	Moderate	
29	37004031	LDR	R-1-SP	4.1	7.27	22.24	161	129	Above Moderate	None
30	36329117	HDR	RM-2	20	21.78	2.53	55	44	Lower	Dam Inundation Zone
31	36338047	HDR	RM-2	20	21.78	4.44	96	76	Lower	Dam Inundation Zone
32	36309084 (portion)	LDR	R-1-SP	4.1	7.27	2.49	18	14	Above Moderate	Dam Inundation Zone
33	36352023T	LDR	R-1-SP	4.1	7.27	2.11	15	12	Above Moderate	Dam Inundation Zone
34	37012238	HDR	RM-2	20	21.78	0.97	21	16	Lower	Dam Inundation Zone
35	37006074	LDR	R-1-6	4.1	7.27	18.25	132	106	Above Moderate	None
36	37018196	LDR	R-1-6	4.1	7.27	0.55	4	3	Above Moderate	None
37	37004021	LDR	R-1-6	4.1	7.27	12.32	89	71	Above Moderate	None
38	37004037	LDR	R-1-6	4.1	7.27	8.83	64	51	Above Moderate	None

APPENDIX 1L: CITY OF REEDLEY

Site No.	APN	GP Des.	Zoning	Min. Density	Max. Density	Parcel Size (acres)	Max. Capacity	Realistic Capacity	Affordability	Constraints/Notes
39	36803028	LDR	R-1-6	4.1	7.27	40	290	232	Above Moderate	100-Year Flood Zone, Landslide Zone, Dam Inundation Zone
40	36803074	LDR	R-1-6	4.1	7.27	16.24	118	94	Moderate	Dam Inundation Zone
41	37034326	LDR	R-1-6	4.1	7.26	0.54	4	3	Above Moderate	Dam Inundation Zone
42	36348215T	P/IF	R-1-7	0	6.22	1.84	11	9	Above Moderate	None
43	36343114	LDR	R-1-9	4.1	4.84	0.66	3	2	Above Moderate	Dam Inundation Zone
44	36840046	SR	R-E	0	0.15	0.81	1	1	Above Moderate	Dam Inundation Zone
45	36841045	SR	R-E	0	0.15	0.75	1	1	Above Moderate	Dam Inundation Zone
46	36844026	SR	R-E	0	0.15	0.72	1	1	Above Moderate	Dam Inundation Zone
47	37007085	LI	ML	8	8	9.3	74	5	Moderate	Dam Inundation Zone
48	37024066	LI	ML	8	8	14.1	112	8	Moderate	None
	Lower-Income Capacity									
Moderate-Income Capacity								165		
	Above Moderate-Income Capacity									
Total Vacant Land Capacity								1,330		

Source: City of Reedley, November 2023.

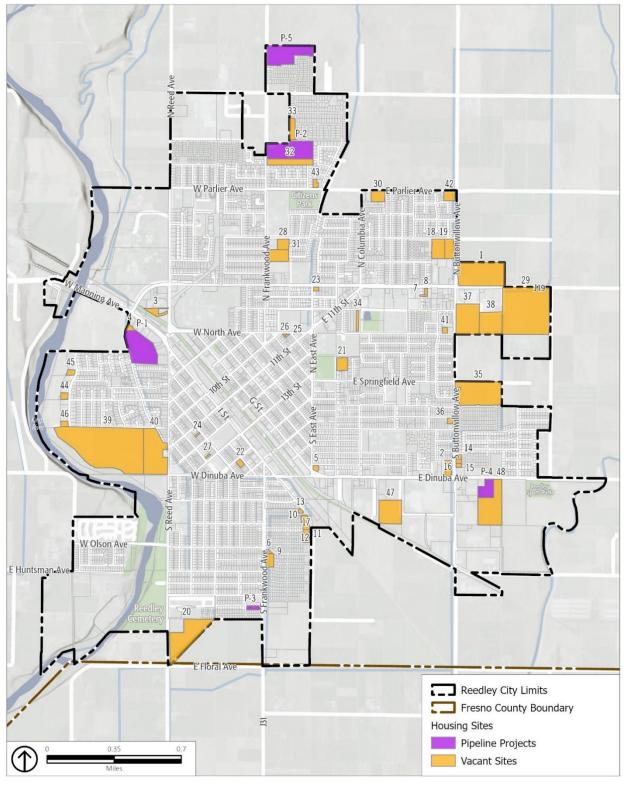


FIGURE 1L-1 REEDLEY SITES INVENTORY

Source: City of Reedley, March 2023

Approved and Pending Projects

The City is relying on one approved project, Kashian Student and Workforce Housing, and two pending projects, Fino Estates/ Chateau Estates/ Residences at the Edge MF and Kingsview, to meet a portion of the RHNA (see **Figure 1L-1**). These projects provide the City with capacity for 79 units toward the lower-income RHNA, 81 units toward the moderate-income RHNA, and 173 units toward the above moderate-income RHNA (**Table 1L-6**).

The Kashian Project (site P-1) was approved in 2022 and includes 60 market-rate units to serve the student population at Reedley College, and 70 market-rate workforce housing units. Building permit applications are anticipated in late 2023, with issuance in 2023 or early 2024. Only the workforce housing units are being counted toward the RHNA. The student housing is surplus to the RHNA.

The Fino Estates (site P-2) was the name of Tentative Subdivision Map for Chateau Estates Single-Family and Residences at the Edge Multifamily. The Chateau Estates, with 35 single-family units, was approved in 2019. Building permit applications are anticipated in August 2024. The Residences at the Edge, with 80 multifamily units, is anticipated to receive entitlement approval in August 2023 and a building permit in August 2025.

Kingsview (site P-3) is pending approval, requiring entitlement and environmental processes prior to submitting applications for building permits and approval of final maps. Though still in early stages of the project planning process, it is expected to be constructed prior to the end of the planning period.. Kingsview is proposed to include 16 townhomes.

Reedley I (site P-4) was approved in 2022. A CUP for a mixed-use project in the ML Light Industrial Zone District was approved for Reedley I for 80 affordable units, a 1,500 square foot community room, and 1,000 square foot office/retail space on 4.2 acres of the larger, 18.3-acre APN 37024066. To ensure the affordability of the 80 units, the applicant is applying for County of Fresno HOME funds and LIHTC funds with the following unit mix breakdown: 16 units extremely low-income, 30 units very low-income, 33 units low-income and 1 moderate-income manager's unit. The City anticipates issuing building permits in January 2024 and a Certificate of Occupancy in May 2025. The remainder of this parcel has been included in the vacant sites inventory (site 48) for potential additional residential development associated with, or adjacent to, Reedley I.

San Rio Phase 3 (site P-5) was approved in 2018 and the final map recorded in 2022. San Rio Phase 3 will include 52 market-rate, single-family homes. The City issued 12 building permits in May and June 2023; and anticipates issuing the remaining 39 building permits by April 2024.

Table 1L- 6 Approved and Pending Projects to Meet the RHNA

C / CC	70							
0700								
	60**							
R / RM-2	80							
R / R-1-6	35							
R / R-1-6	16							
I / ML	80							
R / R-1-6	52							
Lower-Income Units								
Moderate-Income Units								
Above Moderate-Income Units Total Units								
	R / R-1-6 R / R-1-6 I / ML R / R-1-6 me Units me Units							

Source: City of Reedley, March 2023.

^{*}Fino Estates (VTSM 6167) was the name of Tentative Subdivision Map for Chateau Estates Single-Family and Residencies at The Edge Multifamily.

^{**}The student housing portion of the Kashian Mixed Use Project is only being counted towards surplus capacity and is not counted towards the City's RHNA.

^{***79} units lower-income and 1 moderate-income manager's unit.

Accessory Dwelling Unit Potential

California Government Code Section 65583.1(a) states that a town, city, or county may identify sites for accessory dwelling units (ADU) based on the number of ADUs developed in the prior Housing Element planning period, whether the units are permitted by right, the need for ADUs in the community, the resources or incentives available for their development, and any other relevant factors. Based on recent changes in state law reducing the time to review and approve ADU applications, requiring ADUs that meet requirements to be allowed by right, eliminating discretionary review for most ADUs, and removing other restrictions on ADUs, it is anticipated that the production of ADUs will increase in the 6th cycle Housing Element planning period.

The City issued three building permits for ADUs in 2019, two in 2021, and three in 2022, for a total of eight ADU building permits during the previous planning period. Based on these trends, the City anticipates that 13 ADUs will be built by December 2031. To promote ADUs, the City has included **Program 12** to comply with State law and make construction of ADUs feasible for more property owners.

ADUs are seen as an appropriate housing type for a primary residence for low-income households. Because regional affordability analysis of ADUs was not available for Fresno County, the City relied on rental rates for one- and two-bedroom units as a proxy for ADU rental rates. According to 2016-2020 ACS 5-year estimates, the median gross rent for one-bedroom units in Reedley is \$825 per month, and for two-bedroom units is \$941 per month. As shown in Table 2-24, Fresno County Ability to Pay (2022), in Chapter 2, Housing Needs Assessment, low-income households can afford between \$1,091 (one-person households) and \$1,558 (four-person households) in monthly housing costs without being cost burdened. 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 in Reedley. 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.

Summary of Capacity to Accommodate the RHNA

Table 1L-7 compares the City's RHNA to its site inventory capacity. Accounting for approved and pending projects (including ADUs), vacant site capacity, and the projected ADUs, the City has a surplus of 408 units. Breaking this down by income category, the City has a surplus of 16 units in the lower-income (including extremely low, very low-, and low-income) category, an 43-unit surplus in the moderate-income category, and a 159-unit surplus in the above moderate-income category.

Income Category	RHNA	Vacant Site Capacity	Pipeline Projects*	Projected ADUs	Approved ADUs**	Total Capacity	Surplus
Very Low	403	518	79	4		602	1.6
Low	183	318	19	4	1	002	16
Moderate	211	165	81	5	2	254	43
Above Moderate	666	647	173	4	1	825	159
Total	1,463	1,330	333	13	4	1,681	218

Table 1L-7 Summary of Residential Capacity Compared to the 6th Cycle RHNA

Source: FCOG, 2022; City of Reedley, 2023.

Adequacy of Public Infrastructure

Water

The City of Reedley Department of Public Works (Reedley DPW) Water Division is responsible for the distribution and management of the City's water supply. The Water Division is responsible for all aspects of the City's public water system operated under domestic water supply and manages the City's groundwater management programs, the recycled water program, City contracts, joint power agreements, and master planning of the City's water infrastructure.

The City's water system consists of 98 miles of water lines ranging from 2 to 12 inches, 7 active groundwater wells, 805 fire hydrants, and 3 elevated storage tanks. Of the three storage tanks, two are 0.1 million-gallon tanks and one is a 1.4 million-gallon tank. The City's water storage tanks provide storage capacity to help meet peak hour demands and continuously pressurize the distribution system depending on water levels in the tanks.

The City plans for its water supply through various master plan documents. In addition to the Reedley General Plan, the following City plans identify Reedley's vision for its existing and future water resources:

- The Reedley 2020 Urban Water Management Plan (UWMP) provides City guidance for efficient water supply use and conservation of water, anticipates future water supply needs, and describes actions to undertake during drought years. In March of 2022, the Reedley UWMP was adopted by the City Council.
- The Reedley 2014 Integrated Master Plan examines the feasibility of Reedley's planned growth as identified in its 2014 General Plan. The 2014 Integrated Master Plan considers urban growth from water, sanitary sewer, and storm drainage systems and develops a plan for future water public facilities for the City to implement as it experiences outward growth. In 2014, the City Council adopted the Integrated Master Plan.

^{*}Excludes student housing portion of Kashian project.

^{**}ADUs approved since 6/30/23.

According to the State Water Resources Control Board, the City pumps an annual average of 1.597 million gallons (equivalent to 4,893 acre-feet of water) for potable use. The maximum day demand averages 8.5 million gallons, or 5,900 gallons per minute. The City has a maximum production capacity of 11,600 gallons per minute from the seven active wells and is therefore operating at approximately 50.9 percent of its total capacity. As of June 2019, the Water Division provides potable water to approximately 6,400 active service connections for domestic, commercial, institutional, and industrial uses.

Based on maximum production capacity, the City has sufficient water capacity to accommodate development of the City's RHNA in addition to existing connections.

Wastewater

The Reedley PWD Wastewater Division provides collection, conveyance, treatment, and reclamation of wastewater generated by residential, commercial, and industrial sewer customers. The City's public sewer system consists of a network of underground sewer pipelines, lift stations, and necessary infrastructure connections to collect wastewater from the source and to convey it for treatment at the Wastewater Treatment Plant (WWTP). Additionally, the Division oversees and implements the City's Sewer System Management Plan and operates the WWTP.

Currently, the City operates its WWTP with an average daily flow of 1.8 to 2.0 million gallons per day (mgd) per month. In 2009, the City completed Phase 1 of expanding the WWTP, which consisted of a 5.0 mgd expansion project and constructed new percolation ponds to provide sufficient capacity for the City to nearly double in size from current build out, which is more than enough capacity to accommodate the 6th cycle RHNA. According to the City, the additional phased improvements are designed to expand to a total capacity of 7.0 mgd. At total plant buildout the City's WWTP is expected to accommodate the anticipated growth for the next 20 years.

SECTION 1L-3: LOCAL ASSESSMENT OF FAIR HOUSING

Introduction

Assembly Bill (AB) 686 requires that all housing elements due on or after January 1, 2021, contain an Assessment of Fair Housing (AFH) consistent with the core elements of the analysis required by the federal Affirmatively Furthering Fair Housing (AFFH) Final Rule of July 16, 2015. 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."

California Government Code Section 65583 (10)(A)(ii) requires local jurisdictions to analyze racially or ethnically concentrated areas of poverty, disparities in access to opportunity, and disproportionate housing needs, including displacement risk. Although this is the Housing Element for the City of Reedley, Government Code Section 65583(c)(10) requires all local jurisdictions to address patterns locally and regionally to compare conditions at the local level to the rest of the region. To that end, a Multijurisdictional Housing Element was completed for the cities of Firebaugh, Fowler, Fresno, Huron, Kerman, Kingsburg, Mendota, Orange Cove, Parlier, Reedley, San Joaquin, Sanger, Selma, and the County of Fresno, including a regional AFH, and each participating jurisdiction prepared a local AFH.

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. Through discussions with housing service providers, fair housing advocates, and this assessment of fair housing issues, the City of Reedley identified factors that contribute to fair housing issues. These contributing factors are in **Table 1L-15**, **Factors Contributing to Fair Housing Issues** with associated actions to meaningfully affirmatively further fair housing related to these factors. Additional programs to affirmatively further fair housing are included in **Section 1L-1**, **Action Plan**.

This section also includes an analysis of the Housing Element's sites inventory compared with fair housing factors. The location of housing in relation to resources and opportunities is integral to addressing disparities in housing needs and opportunity and to fostering inclusive communities where all residents have access to opportunity. This is particularly important for lower-income households. AB 686 added a new requirement for housing elements to analyze the distribution of projected units by income category and access to high resource areas and other fair housing indicators compared to citywide patterns to understand how the projected locations of units will affirmatively further fair housing.

¹ 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.

Outreach

As part of the Multi-Jurisdictional Housing Element update process, the City hosted and participated in a variety of outreach efforts locally and throughout the county. The purpose of outreach was to solicit feedback from local stakeholders and members of the community to inform the assessment of housing need and program development. This Assessment of Fair Housing includes a summary of local outreach activities. A full summary of outreach efforts can be found in Chapter 1, Introduction.

Community Workshop

On September 20, 2022, the City of Reedley held an in-person Community Workshop 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 and Spanish through the FCOG listserv of regional stakeholders and community based organizations (CBOs) and through the Fresno Housing Authority. City staff also distributed flyers with tote bags and frisbees attendees at the Reedley Street Eats event on September 15, 2022, dropped off flyers at the affordable Riverland Apartments complex and emailed current and previous housing applicants, and distributed flyers, snacks, and waters to attendees of a Zumba class at the Reedley Community Center in an effort to reach all members of the community through a variety of strategies. Information about the workshop was also posted on the City's Facebook page with a link to the Eventbrite registration page, which included information about Spanish language interpretation, refreshments, and activities for children that would be available at the workshop.

However, despite these extensive outreach efforts to inform community members of the event, there were only four participants. The main theme of the discussion was the need for more affordable housing resources, both single-family and multifamily, to provide homeownership opportunities and housing types to meet the needs of students and staff at Reedley College. It was noted that affordable housing developers are held to higher standards, including ADA requirements, than market rate developers, which contributes to financial barriers to new affordable housing opportunities. Participants expressed concern that lot sizes in the city were generally too small to accommodate second units and how they would impact parking in neighborhoods.

Attendees expressed concern about the drought and new Sustainable Groundwater Management Act (SGMA) requirements potentially conflicting with ability to develop new housing, but noted that Reedley is in a better position with regard to water supply than many of the other communities in Fresno County due to its location on the Kings River. Participants identified concerns regarding pressures for development of agricultural land at the fringes of the city and expressed a need for more flexibility with the zoning code to stimulate infill of properties within the city boundaries.

Following the workshop, the City posted English and Spanish copies of the workshop presentation on the Fresno County Multijurisdictional Housing Element Update website for residents to access at their convenience. Feedback received during this workshop was used to inform this AFH as well as associated programs, as identified in in **Table 1L-15**, **Factors Contributing to Fair Housing Issues**.

Study Session

A joint study session was held with the Planning Commission and City Council at a special meeting on October 11, 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.

Consultations

During the Housing Element update process, staff reached out to three stakeholder organizations to offer the opportunity for each to provide one-on-one input on housing needs and programs in Reedley: SERVE Reedley, Postharvest Operations/Prima Wawona, and the Building Industry Association (BIA) of Fresno/Madera Counties. A response was only received from BIA, a representative of which was interviewed on November 22, 2022.

The stakeholder 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. Although homes in Reedley are affordable in relation to the eastern areas of the county, the stakeholder identified a need for larger rental units, in addition to units of all types and sizes, to help reduce the incidence of overcrowding and lack of housing mobility opportunities. However, the stakeholder expressed that Reedley's more limited services, employment opportunities, and public facilities compared to northern cities means that home prices are naturally lower, though developer interest is also more limited, particularly as higher densities are required for affordable housing that are often not congruent with the city's current development patterns. In addition to these constraints on development, the stakeholder emphasized water access issues as additional costs to development in Reedley.

Assessment of Fair Housing Issues

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.

The TCAC/HCD Opportunity Maps can help to identify areas within the community that provide strong access to opportunity for residents or, conversely, provide low access to opportunity. The information from the opportunity mapping can help to highlight the need for housing element policies and programs that would help to remediate conditions in low-resource areas and areas of high segregation and poverty and to encourage better access for lower-income households and communities of color to housing in high-resource

areas. TCAC/HCD categorized census tracts into high-, moderate-, or low-resource areas based on a composite score of economic, educational, and environmental factors that can perpetuate poverty and segregation, such as school proficiency, median income, and median housing prices. The TCAC/HCD Opportunity Maps use a regional index score to determine categorization as high, moderate, and low resource.

Areas designated as "highest resource" are the 20.0 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 health, economic opportunities, and education attainment. Census tracts designated "high resource" score in the 21st to 40th percentile regionally. Residents of these census tracts have access to highly positive outcomes for health, economic, and education attainment. "Moderate resource" areas are in the top 30.0 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 but not all areas (e.g., may score high for health, education but score poorly for economic attainment). Low-resource areas score in the lower 30.0 percent of census tracts and indicate poor access to positive outcomes and opportunities. The final designation are 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 30.0 percent of the population in these areas is below the federal poverty line (\$27,750 annually for a family of four in 2022).

As seen on Figure 3-1, Regional TCAC/HCD Opportunity Areas, most of Fresno County, particularly in the incorporated cities, is a mix of low-resource or moderate-resource areas and areas of high segregation and poverty, with pockets of high-resource designations. The City of Reedley has areas ranging from moderate to high resource and areas designated high segregation and poverty, as discussed throughout this assessment.

Patterns of Integration and Segregation

At the time of this writing (Summer 2022), HCD's AFFH Data Viewer included the 2021 TCAC/HCD Opportunity Map. Therefore, the following assessment of fair housing is based on data from 2021. However, since the time of writing, the AFFH Data Viewer was updated with the 2022 TCAC/HCD Opportunity Map and, subsequently, the 2022 COG Geography TCAC/HCD Opportunity Map, which is based on a similar formula but compares each tract to those within the COG region rather than regions defined by TCAC. In the case of Fresno County, the comparison region changed from the Central Valley Region to the boundaries of Fresno COG, resulting in internal comparisons of Fresno County cities and communities.

At the COG level, the data for Fresno County presents a potentially skewed perspective as most cities in the county have small populations, housing stocks, and employment centers compared to the cities of Fresno and Clovis. Fresno and Clovis, as the two largest cities in the county and among the largest in the region, provide access to educational and economic opportunities that are not typically found outside of large cities. Further, both, though particularly Clovis, include affluent neighborhoods that influence TCAC scores. Therefore, access to resources using this methodology appears to weigh proximity to Fresno and Clovis more heavily than local resources. For example, in the 2021 TCAC/HCD Opportunity Map, the community of Biola and the City of Kingsburg are both designated as moderate to highest resource areas based on local context. However, in the 2022 COG Geography TCAC/HCD Opportunity Map, both are designated as low resource areas. The number of jobs, school performance, environmental conditions, median incomes, and other factors that are included in the Opportunity Map methodology did not change significantly between 2021 and 2022 in these communities. The primary driver of the change in resource area designation is likely the proximity to resources and opportunities in the major cities of Fresno County. As many communities in the county are largely rural and agricultural in nature, most local resources have more limited capacity, but do serve the local population.

Given the potential limitations of an internal comparison, FCOG opted to maintain the analysis based on a larger geographic comparison to other jurisdictions in the Central Valley Region to reflect the interconnectedness of economies in this region, and similarities between the size and nature of many communities. However, where HCD has determined significant changes in resource area designation between the 2021 TCAC/HCD Opportunity Map and 2022 COG Geography TCAC/HCD Opportunity Map (i.e., high resource to low resource, or vice versa), the analysis notes the differences, potential causes, and strategies to address local discrepancies in access to opportunities.

In Reedley, the 2021 TCAC/HCD Opportunity Map designates the city as a mix of Area of High Poverty and Segregation in the northeast quadrant, moderate in the central downtown core, and high and highest resource designations in the northwest, west, and southern portions of the city. In comparison, the 2022 COG Geography TCAC/HCD Opportunity Map designates the majority of the city as moderate resource, the northern and southern perimeter neighborhoods as high resource, with the southeast section of the city designated Area of High Poverty and Segregation. However, as is discussed in this analysis, some neighborhood areas in Reedley reflect positive economic, environmental, and educational characteristics that are more consistent with a moderate or high resource designation when compared to other jurisdictions in the region.

For example, in the western Riverbottom neighborhood, adjacent to the Kings River on the western edge of the city, positive indicators of quality of life include a high median income, high ownership rates, positive expected educational attainment scores, positive environmental conditions, and more. This neighborhood has the lowest proportion of non-White persons, 50.7 percent, and this block group also has the highest median income in the city and a highest-resource designation. Based on these characteristics, this neighborhood likely reflects moderate to high access to resources for residents, as reflected in the 2021 TCAC/HCD Opportunity Map. The neighborhoods in the southwest quadrant have moderate economic,

education, and environmental quality of life indicators, a predominance of owner-occupied housing, moderate rates of cost burden and low poverty rates. Based on these characteristics, this neighborhood likely reflects moderate access to resources for residents as reflected in the 2021 TCAC/HCD Opportunity Map.

In the northeast quadrant of the city there are several neighborhoods with less positive indicators of quality of life and potential indicators of segregation, such as a low median income, high proportion of renters, high poverty rates, low to moderate anticipated economic outcome, moderate environmental scores, and a high proportion of non-White residents. Based on these characteristics, although education scores are moderate to high, these neighborhoods likely reflect low to moderate access to resources for residents and meet the definition of an Area of High Segregation and Poverty in the regional context of the 2021 methodology. Though there is no singular causal factor for this higher concentration of segregation and poverty, it is a neighborhood with a prevalence of higher-density multifamily zoning. The affordability that comes from higher-density housing may make it easier for lower-income households to live in this area, causing a concentration. Additionally, housing conditions in this area tend to be an issue, which may further lower rents and make housing more accessible for lower-income households. Local knowledge of this neighborhood notes that it does not functionally seem to have fewer opportunities and resources than any other part of the city. Information about specific characteristics of this area and other areas of the city is below:

- Housing: there is a mixture of housing ages in this area, however no new development after the 2000s other than 17 new single-family homes within the last 5 years, and other than Guardian Village (48 multi-unit affordable housing built on state surplus land) which is under construction in this area. The Riverbottom and the Downtown area also have not had substantial new development after the 2000s, with a few owner-built houses here and there and one lower-income housing apartment complex in the Downtown area (Paseo 55) since then. The most growth during/after the 2000s occurred in the southern part of the City and the southeastern part of the City (River Ridge).
- Parks: This area has three large parks (9 acres or larger) and Reedley's Community Center where there are multiple free recreational opportunities available, and two pocket parks. Two of the large parks include walking trails. The City just received a multi-million dollar grant for Camacho Park, one of the larger parks in this area.
- Active Transportation: As shown in Figure 1L-11, this area has 2 transit stops and most of the area is within a ½ mile of a transit stop. The Reedley Community Center has a transit stop and so does one of the shopping centers in this area (Save Mart). There is more transit stop coverage in this area than in the rest of the city.
- Schools and Shopping: The two largest grocery stores in Reedley, two elementary schools and Reedley's only middle school are located in this area.
- Infrastructure: Two of the most travelled streets in the area (one of which Manning Avenue which is the busiest street in the entire city) were reconstructed during the 5th Cycle planning period. Manning Avenue is currently being reconstructed and includes an upsizing of a sewer line from Frankwood to Buttonwillow.
- Physical or geographical barriers: There are no rivers or freeways in this neighborhood, although Manning Avenue is a major arterial.

• Environmental Quality: There are no characteristics of this area that create lower environmental quality in the neighborhood than other neighborhoods in the city.

The City has made capital improvements in this area since the last Housing Element was adopted – primarily to improve the streets. In addition, the City provided a letter of support for a tax credit funding application to fund rehabilitation of the Springfield Apartments. The tax credit application was funded. During consultations with regional stakeholders, interviewees expressed concern about siting affordable units far from opportunity areas, and discussed their desire to see more opportunities created for the development of multifamily housing in desirable locations. In order to encourage housing mobility and mitigate existing concentrations of segregation and poverty, the City has included the following programs:

- In **Program 7**, the City will work with developers of multifamily and affordable housing projects on an annual basis to identify site opportunities in higher-resource areas and areas with higher median incomes to reduce concentrations of poverty (e.g., in the City Center East, South Columbia/East Early Avenue, and Duff and Buttonwillow neighborhoods) and improve access to resources.
- In **Program 8**, the City will prioritize the facilitation of farmworker housing development in higher-opportunity areas, including the Riverbottom neighborhood, the River Ridge neighborhood; and the Reedley Estates, Kingswood Estates, Frankwood Heights, and Hollywood neighborhoods in northern Reedley.
- In **Program 9**, 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 15 percent of the new units. Particular focus will be given to encouraging housing mobility by facilitating development of lower-income units in higher-opportunity areas, including the Riverbottom neighborhood, the River Ridge neighborhood; and the Reedley Estates, Kingswood Estates, Frankwood Heights, and Hollywood neighborhoods in northern Reedley.
- In **Program 10**, the City will encourage the development of SRO facilities, transitional and supportive housing, and other special housing arrangements and will expand regulatory incentives for the development of units affordable to extremely low-income households and housing for special-needs groups, including persons with disabilities (including developmental disabilities), and individuals and families in need of emergency/transitional housing. Particular focus will be given to facilitating development of lower-income units in higher-opportunity areas, including the Riverbottom neighborhood, the River Ridge neighborhood; and the Reedley Estates, Kingswood Estates, Frankwood Heights, and Hollywood neighborhoods in northern Reedley.
- In **Program 12**, the City will encourage the development of ADUs, particularly in predominantly single-family neighborhoods with higher median incomes, such as the Riverbottom neighborhood. The City will provide informational materials on ADU opportunities to all discretionary land use applicants and will continue to implement the public education program advertising the opportunity for ADUs by updating informational handouts and brochures about ADUs that are available on the City's website and at the public counter annually, or as needed to reflect changes in State law. The City will also reach out directly with the informational materials to homeowners.
- In **Program 16**, the City will encourage housing developers to include mobility-impaired accessibility in their project designs and prioritize these types of projects to increase housing

- mobility opportunities for seniors and persons with disabilities particularly in higher-opportunity areas such as the southwest, far north, and far east sides of the city.
- In **Program 18**, the City will implement preliminary application reviews and will streamline the approval process and standards for eligible projects under SB 35. The City will prioritize new opportunities in higher-resource areas such as the southwest, far north, and far east sides of the city.
- In **Program 23**, the City will continue to participate in the Fresno County Homebuyer Assistance Program and will conduct program outreach focused on lower-income areas of the city with a higher concentration of qualifying households, including the north and east sides of the city, as well as parts of the downtown area.
- In **Program 25**, the City will work with the Housing Authority to disseminate information to landlords and property owners on incentives for participating in the HCV program throughout the city to promote housing opportunities for all residents. Targeted additional outreach will be made to landlords and property owners in higher-opportunity areas, including the Riverbottom neighborhood along the Kings River just south of Reedley College; the River Ridge neighborhood; and the Reedley Estates, Kingswood Estates, Frankwood Heights, and Hollywood neighborhoods in northern Reedley.

In 2021 TCAC and HCD designated Central City East as moderate resource, with a low economic outcome indicator, educational attainment in the 63rd percentile and a moderate environmental score; and the southeast Columbia/East Early neighborhood section of the city as high resource, with low to moderate economic outcome, moderate to high educational attainment scores, and positive environmental conditions. While there are indicators of lower quality of life in this section of the city, and potential indicators of segregation, based on these characteristics, these neighborhoods likely reflect moderate to high access to resources for residents in the context of the greater region as reflected in the 2021 TCAC/HCD Opportunity Map. In contrast, when taken only in the smaller context of the Fresno COG in the 2022 methodology, the quality of life indicators may not reflect as positive access to resources when compared against the higher scoring conditions in Fresno and Clovis and the higher rates of non-White residents and poverty may meet the definition of an Area of High Segregation, although underlying moderate and higher quality of life conditions remain consistent with those in the 2021 methodology. Therefore, the 2021 TCAC/HCD Opportunity Map likely more accurately represents access to resources when compared to the larger region.

It is worth noting that the use of the TCAC/HCD Opportunity Maps are just the basis of the Assessment of Fair Housing, and a more detailed analysis of specific conditions within the jurisdiction provides a more comprehensive understanding of current patterns. The Opportunity Maps, and the full Assessment, inform programs to improve access to resources throughout the city.

Income Distribution

The City of Reedley consists of 12 block groups and 5 census tracts, one of which contains unincorporated areas outside of the city boundaries. The San Joaquin Valley Railroad divides the city into east and west sections. Locally, the TCAC/HCD Opportunity Maps designate most census tracts in the City of Reedley as moderate, high, and highest resource (**Figure 1L-2, Local TCAC/HCD Opportunity Areas**). However, an area in the northeast corner of the city—north of East Springfield Drive, south of West Parlier Avenue,

east of North Frankwood Avenue, and west of North Buttonwillow Avenue—is designated High Segregation and Poverty. This area includes the Rosewood Estates, TL Reed, N. Haney, East Manning Avenue, and Red Beaut Avenue neighborhoods. The census tract bounded by North Street, South East Avenue, and the San Joaquin Valley Railroad has been designated moderate resource. This area is largely light industrial, warehousing, institutional, and business uses along the rail line, with commercial uses and services on either side of 11th Street and in the vicinity of the intersection of 11th Street and G Street and older residential neighborhoods in Central City East.

Three areas in the city are designated highest resource, as shown on Figure 1L-2. These include the Riverbottom neighborhood along the Kings River just south of Reedley College; the River Ridge neighborhood; and the Reedley Estates, Kingswood Estates, Frankwood Heights, and Hollywood neighborhoods in northern Reedley. Each of these neighborhoods is predominantly larger single-family homes, with many of them in northern Reedley still under construction. The remainder of the city is designated high resource, except the tract west of the San Joaquin Valley Railroad and east of South Reed Avenue, and north of West Dinuba Avenue, that includes the Central City West neighborhood, commercial light industrial west of the rail line, and the Washington Elementary School; this tract has no resource opportunity designation. However, TCAC/HCD's Economic Domain and Educational Domain scores for this tract indicate less positive expected outcomes, which may indicate that this tract has some characteristics that are more reflective of a lower resource designation. (Figure 1L-3, Local TCAC/HCD Educational Domain Score).

18 19 41 E-Springfield-Ave-W-Dinuba-Ave-E Floral Ave Reedley City Limits TCAC Opportunity Areas 2021 - Composite Score (Tract) Fresno County Boundary Resource Category **RHNA Sites Highest Resource** Above Moderate Income High Resource Moderate Income Moderate Resource (Rapidly Low Income Changing) Mixed Income Moderate Resource Low Resource High Segregation & Poverty Missing/Insufficient Data

FIGURE 1L-2 LOCAL TCAC/HCD OPPORTUNITY AREAS

Source: TCAC/HCD, 2021; City of Reedley, 2023

-W-North-Ave-W-Dinuba-Ave-E Floral Ave TCAC Opportunity Areas 2021 - Education Reedley City Limits Score (Tract) Fresno County Boundary Education Domain Score (by region) **RHNA Sites** < .25 (Less Positive Education Affordability Category Outcomes) Above Moderate Income .25 - .50 Moderate Income .50 - .75 Low Income > .75 (More Positive Education Outcomes) Mixed Income No Data

FIGURE 1L-3 LOCAL TCAC/HCD EDUCATIONAL DOMAIN SCORE

Source: TCAC/HCD, 2021; City of Reedley, 2023

W-Parlier-Ave-E-Parlier-Av -W-North-Ave-E-Springfield-Ave-W-Dinuba-Ave-E-Dinuba Ave Reedley City Limits TCAC Opportunity Areas 2021 - Economic Score (Tract) Fresno County Boundary Economic Domain Score (by region) **RHNA Sites** < .25 (Less Positive Economic Affordability Category Outcome) Above Moderate Income .25 - .50 Moderate Income .50 - .75 > .75 (More Positive Economic Low Income Outcome) Mixed Income No Data

FIGURE 1L-4 LOCAL TCAC/HCD ECONOMIC DOMAIN SCORE

Source: TCAC/HCD, 2021; City of Reedley, 2023

According to ACS, the citywide median household income in Reedley was \$48,850 in 2020, well below the statewide median of \$78,672 and the Fresno County median of \$57,109. The census tracts where household incomes fall below \$30,000 are found in Central City East, including the affordable Paseo 55 complex on the east side the San Joaquin Valley Railroad in a moderate resource area and a median household income of \$27,217, and the adjacent block group to the east, which includes the Reedley Elderly age-restricted affordable apartments and Sunset Terrace affordable housing units in a high resource area and a median household income of \$26,563 (Figure 1L-5, Local Median Income). Block groups surrounding these two areas to the north and east fall within the \$30,000 to \$55,000 median income range. Four of these block groups are TCAC/HCD designated as High Segregation and Poverty areas, with median incomes from \$36,213 to \$48,173. These areas include the Rosewood Estates, Duff, Buttonwillow, North Haney, Camacho Park, and East Pecan Avenue neighborhoods and their adjacent uses. The affordable Riverland Apartments and Sierra View Homes Retirement community are in these areas of high segregation and poverty.

There are four additional block groups north and south of the central core of the city with incomes between \$30,000 and \$55,000 with high-resource designations. These include the Reedley College campus; the affordable Mountain View, Reedley Family, and Springfield Manor Apartments; and the market rate Willow Glen Apartments. Block groups with median incomes between \$55,000 and the state median of \$87,100 are in the South Columbia/East Early Avenue neighborhood (\$55,953), the Central City West neighborhood (\$61,375), the River Ridge neighborhood (\$77,614), above Parlier Avenue along the northern edge of the city (\$86,964), and the TL Reed neighborhood (\$80,521). The Riverbottom neighborhood at the western edge of the city adjacent to the Kings River is designated highest resource and has the highest income in the city at \$90,406. Three of the higher income block groups include neighborhoods that are primarily in areas farthest from commercial uses and in planned residential subdivisions on larger lots. This indicates that the City of Reedley is a community with residents who earn a wide range of incomes and with distinct higher- and lower-income areas. However, residents throughout Reedley generally experience higher access to resources compared to other jurisdictions in the county. Though access does not consistently correspond to income, this may reflect differences in access to specific opportunity factors, including the TCAC/HCD Economic and Educational Domain scores.

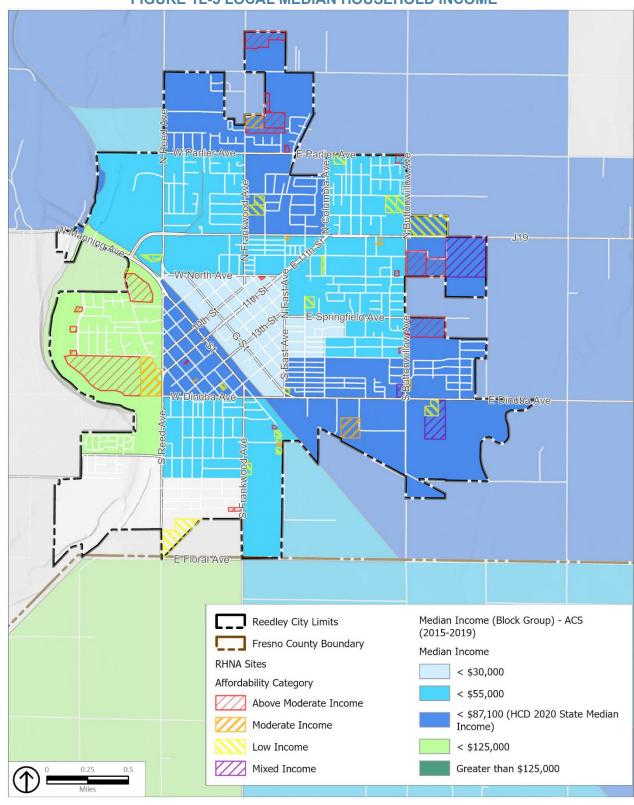


FIGURE 1L-5 LOCAL MEDIAN HOUSEHOLD INCOME

Source: 2015-2019 ACS; City of Reedley, 2023

In the City of Reedley, 18.4 percent of households have an income below the poverty level. The highest rate of poverty (30.3 percent) is found east of the San Joaquin Valley Railroad in Central City East, Duff and Buttonwillow, and South Columbia/East Early Avenue neighborhoods. This area includes older residential housing close to the city's industrial, business park, and corridor-oriented commercial uses, four affordable housing resources, and Fresno Housing Authority units (Figure 1L-6, Local Poverty Rate). The census tract designated High Segregation and Poverty has a poverty rate of 28.4 percent; the western side of the city, with high- and highest-resource area designations, has a poverty rate of 14.4 percent; and the northeastern tract, inclusive of Reedley College and the Hollywood and North Hope Avenue neighborhoods, has an 18.3 percent poverty rate. The lowest poverty rates are north of West Parlier Avenue and east of North Buttonwillow Avenue, at 6.5 percent, although this tract is primarily unincorporated county land. These findings indicate that City of Reedley households living in poverty are most likely to live in or near the regional rail transportation corridor, industrial uses, and the commercial core of the city.

The spatial distribution of household income in the City of Reedley has changed between 2014 and 2020, although block group data for the median incomes are not available for 2014, so specific comparisons cannot be made. In 2014, the two central census tracts directly east of the San Joaquin Valley Railroad had median incomes below \$40,000. The median income in the census tract designated TCAC/HCD High Segregation and Poverty was \$39,711 in 2014; the two block groups south of East Manning Avenue/East 11th Street within the TCAC/HCD High Segregation and Poverty area had lower median incomes in 2020; and the three block groups north of East Manning Avenue/East 11th Street have seen significant increases in median income since 2014. The census tract including Central City East, Duff and Buttonwillow, and South Columbia/East Early Avenue neighborhoods was \$30,144 in 2014, higher than the 2020 median income in the two lowest income city core block groups, yet significantly lower than the portion of the city south of East Duff Avenue and between East Springfield Avenue, East Duff Avenue, South Columbia/South Pecan Avenue, and South Buttonwillow Avenue. Westside neighborhoods identified as having a higher median income based on 2016-2020 ACS estimates were also the city's higher-income areas in 2014, at \$55,324, although the range of median income levels between block groups is not available for comparison at the census tract level. The data indicate that the City of Reedley has distinct higher- and lower-income areas that have subtly shifted over time in some portions of the city and significantly changed in others.

To improve access to higher opportunity areas for lower-income households and reduce concentrations of these households, the City has included **Program 7** to work with developers of multifamily and affordable housing projects to identify site opportunities in higher-resource areas and areas with higher median incomes, **Program 12** to encourage construction of ADUs in predominantly single-family neighborhoods with higher median incomes, and **Program 14** to target development of a variety of housing types in areas of predominantly single-family development and of concentrated overpayment to reduce displacement risk, promote inclusion, and support integration of housing types based on income.

W-Parlier-Ave-J19 -W-Dinuba-Ave-E-Dinuba-Ave E Floral Ave Percent of Population whose income in the Reedley City Limits past 12 months is below poverty level Fresno County Boundary < 10% **RHNA Sites** 10% - 20% Affordability Category 20% - 30% Above Moderate Income 30% - 40% Moderate Income > 40% Low Income Mixed Income

FIGURE 1L-6 LOCAL POVERTY RATE

Source: 2015-2019 ACS; City of Reedley, 2023

Racial and Ethnic Characteristics

The City of Reedley's largest demographic group is Hispanic, comprising 79.1 percent of the city's population. Overall, non-White only residents, including all Hispanic-identifying residents, comprise 84.5 percent of the city's population. White non-Hispanic residents comprise 15.5 percent, followed by Asian/Hawaiian & Pacific Islander at 2.7 percent, and Other at 2.2 percent, with all other racial and ethnic groups represented by smaller populations, each less than 1 percent of the city's population.

There appears to be a pattern indicating an uneven spatial distribution of demographic groups in Reedley, with most of the city having high rates of non-White residents except for the westernmost neighborhoods including the Riverbottom, where a slightly smaller proportion of the population identifies as non-White (Figure 1L-7, Local Racial Demographics). The highest concentrations of populations of color, primarily residents that identify as Hispanic, are found in four of the five block groups designated as High Segregation and Poverty. In these areas, 89.8 percent to 98.3 percent of the population identifies as non-White. Generally, the proportion of the population that identifies as non-White is higher in the eastern portion of the city and decreases in the western areas. Additionally, in the three block groups south of East Springfield Avenue and east of the rail line, the non-White population ranges from 88.9 percent to 97.9 percent. The adjacent block group west of the rail line also has a highly proportion of non-White residents (87.6 percent). Higher concentrations of non-White populations are also in the central core of the city, on both sides of the San Joaquin Valley Railroad, at 92.2 percent non-White on the east side and 85.5 percent non-White on the west side. The Riverbottom neighborhood adjacent to the Kings River on the western edge of the city has the lowest proportion of non-White persons, 50.7 percent, and this block group also has the highest median income in the city and a highest-resource designation. While most of the city has a large proportion of non-White residents, these patterns suggest that there is still a correlation between the socioeconomic characteristics of income and race and ethnicity.

The two block groups within and adjacent to the town core area, with median incomes below \$30,000, correspond to high representations of non-White populations, with 92.2 and 97.9 percent of the population in these areas identifying as non-White. The block groups designated High Segregation and Poverty, with non-White populations ranging from 90.0 to 98.2 percent, correlate to the block groups with incomes between \$30,000 and \$55,000. The block group containing the TL Reed neighborhood within the High Segregation and Poverty designation is an exception with a higher median income and a lower proportion of non-White residents, but it is included in the census tract with block groups that meet the TCAC/HCD criteria for a High Segregation and Poverty designation. However, the correlation between diversity and income in these areas is not consistent throughout the city.

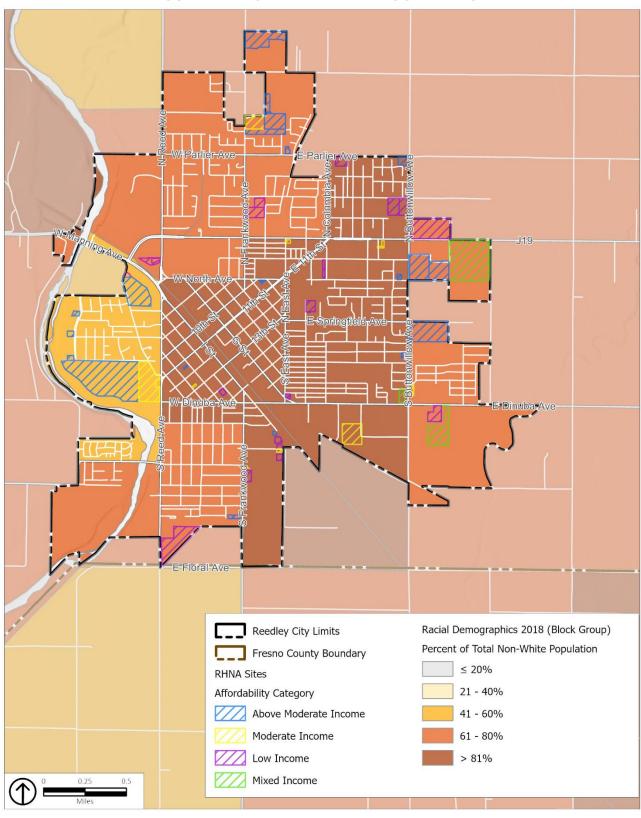


FIGURE 1L-7 LOCAL RACIAL DEMOGRAPHICS

Source: Esri, 2018; City of Reedley, 2023

The block group south of the west city core, including the Riverview/Dinuba, Rupert Street, Shimuzu/Shoemake/Beech, and South Frankwood Avenue neighborhoods, has a lower median income of \$43,914, and the southerly West Huntsman neighborhood has a median income of \$36,544. However, though the neighborhoods closer to the town core and industrial activities along the rail line have a non-White population of 87.6 percent, the West Huntsmen neighborhood block group is 68.4 percent non-White, which might be associated with the residential mix in the mobile home park, Palm Village Retirement community, or location of older, more naturally affordable housing. The two northwest corner block groups that include Reedley College and the Adventist Health facility have slightly less diverse populations, at 76.1 and 73.5 percent respectively, associated with median incomes between \$30,000 and \$55,000, at \$47,750 and \$41,585 respectively.

The proportion of non-White residents in Reedley increased between 2010 and 2020. Block groups that had between 41.0 and 60.0 percent non-White populations in 2014—which included the majority of the city with the exception of north central block groups and the Riverbottom neighborhood—had increases in those populations to more than 81.0 percent in 2020. The block group with Reedley College had a 42.0 percent non-White population in 2014 that increased by 2020 to 76.1 percent. The three northern block groups fell between 21.0 and 40.0 percent in 2010, increasing to between 68.8 percent and 77.0 percent non-White population in 2020, and the Riverbottom neighborhood, with a non-White population below 20.0 percent in 2014, increased to 50.7 percent in 2020. Approximately 55.4 percent of Reedley's housing stock is over 30 years old, which makes them typically more affordable housing options, and the city has eight affordable housing complexes; a 179-unit mobile home park; and a higher proportion of duplex, triplex, and fourplex units than Fresno County as a whole. This may contribute to the changes in the socioeconomic characteristics in the area due to affordability and rental opportunities compared to other jurisdictions.

According to the University of California Berkeley Urban Displacement Project (2021), neighborhood segregation typology categorizes the majority of the central eastern portion of the city bounded by North Buttonwillow Avenue, the San Joaquin Valley Railroad, East Parlier Avenue, and South Frankwood Avenue as concentrated mostly Latinx; low-income households comprise between 48.0 and 54.1 percent of total households; and the proportion of renter households ranges from 46.8 to 50.9 percent. However, due to the affordability of rental costs in this portion of the city compared to other jurisdictions in the region, the displacement risk is identified as low. The remainder of the city is designated Latinx/White, with a corresponding low displacement risk. The census tract including the Reedley College campus has socioeconomic characteristics generally corresponding to adjacent tracts to the east, with the exception of a lower proportion of Hispanic residents (61.7 percent) and higher representation of all other racial and ethnic groups in the city, most likely reflecting the residents associated with the college. The entire southwestern tract has slightly lower proportions of low-income households and the highest representative mix of all other racial and ethnic groups in the city. The remainder of the western and southwestern, northern, and eastern perimeter neighborhoods have significantly lower rates (low 20th percentile) of renter households, and rates of lower-income households in the 20th percentile in the northern and eastern perimeter neighborhoods.

APPENDIX 1L: CITY OF REEDLEY

There is one census tract that in 2023 was identified as an Area of High Segregation and Poverty, as defined by the U.S. Department of Housing and Urban Development (HUD), in Central City East, South Columbia/East Early Avenue, and Duff and Buttonwillow neighborhoods (Figure 1L-8 Area of High Segregation and Poverty). This area includes four affordable housing complexes on the east side of the San Joaquin Valley Railroad. In contrast, Reedley does not contain any Racially Concentrated Areas of Affluence (RCAA). Data indicate that the White-identifying proportion of the population in Reedley has decreased and household income has risen since 2010 (see Section 2: Housing Needs Assessment, "Income Distribution" section). The incidence of poverty and the increasing predominance of communities of color suggests that the city offers some housing opportunities to this segment of the Fresno County population, or conversely, may not present as much of a barrier to accessing housing as other jurisdictions in the region.

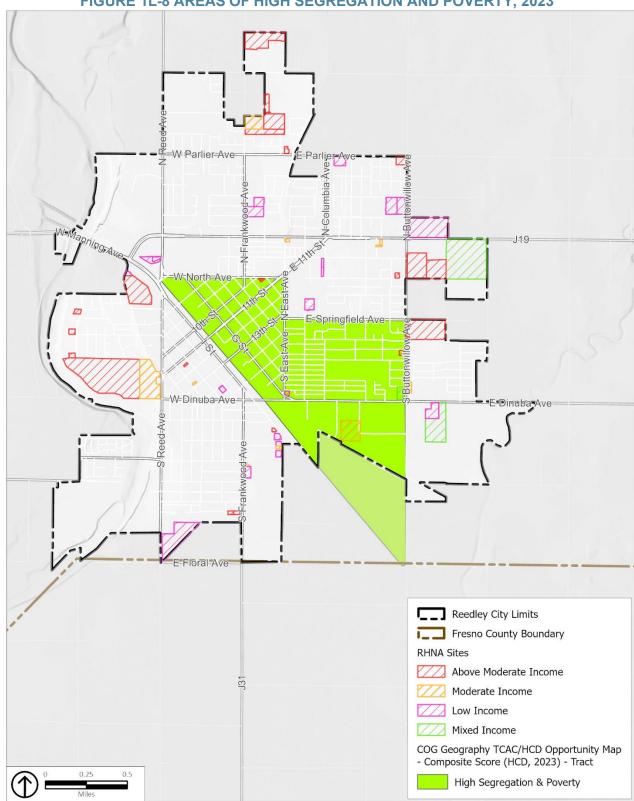


FIGURE 1L-8 AREAS OF HIGH SEGREGATION AND POVERTY, 2023

Source: California Tax Credit Allocation Committee, 2023; City of Reedley, 2023

Familial Status

Like several other jurisdictions in Fresno County, the majority of households in Reedley are family households (87.5 percent). Family households are defined by California law as a household of two or more persons, regardless of relationship status. Reedley's rate of married couple households is 57.6 percent, and an additional 6.1 percent of households are unmarried couples. In the Area of High Segregation and Poverty census tract, 49.1 percent of the population over age 18 lives in married-couple households, comparable to the proportion on the west side of the rail line and the northeastern portion of the city, both at 49.6 percent. However, in the Area of High Segregation and Poverty tract, 3.7 percent of households are in unmarried couple households, compared to 9.9 percent in the western side and 4.8 percent in the northeast High Segregation and Poverty tract. A slightly higher proportion of married couples is in the northern perimeter Hollywood Drive, East Aspen, and Victoria Square Estates III neighborhoods and the eastern perimeter River Ridge neighborhood, with the rate of unmarried couples at only 2.9 percent. The highest percentage of the married couple families is in the Reedley College northwest tract, 51.6 percent, and 5.2 percent live as unmarried couples.

Approximately 23.7 percent of Reedley households are family households headed by single adults, higher than both the Fresno County rate of 22.2 percent and the California rate of 21.0 percent. There does not appear to be a distinct correlation between TCAC designations and married or unmarried couple household family composition, with both representing approximately between 45.2 and 48.0 percent of the population (note: not households), but the east side has a slightly lower proportion of married couple families and higher proportion of unmarried couples compared to the west side; conversely, the east side has a slightly lower proportion of unmarried couples than the west side and higher proportion of married couple families.

Reedley's proportion of single female-headed households is 23.0 percent of total households, of which 30.4 percent live alone, 49.3 percent have their own children, 22.1 percent live with other related children or relatives, and 4.3 percent live with housemates. Single male-headed householders comprise 12.9 percent of total households, of which 27.4 percent live alone, 31.8 percent live with their own children, 35.2 percent live with other children or relatives, and 2.5 percent live with housemates. In the western and northeastern tracts in the city, fewer than 20.0 percent of households are female-headed with children (**Figure 1L-9**, **Local Single Parent Female-Headed Households with Children**). The remainder of the city's rates of female-headed households with children are between 20.0 and 40.0 percent. Of the census tracts with lower proportions of single female-headed households, the northeast portion of the city has a smaller proportion of persons living alone (3.4 percent) and persons living with non-relatives (5.2 percent) than the eastern side of the city, where 10.3 percent of persons live alone and 1.6 percent live with non-relatives. Approximately 4.9 percent of adults the Area of High Segregation and Poverty tract live alone, and 2.8 percent live with housemates; 8.8 percent of the perimeter neighborhood population over 18 live alone and 1.8 percent share homes with non-relatives; and 4.5 percent of the Reedley College neighborhood population over 18 live alone, with 9.1 percent sharing homes with non-relatives.

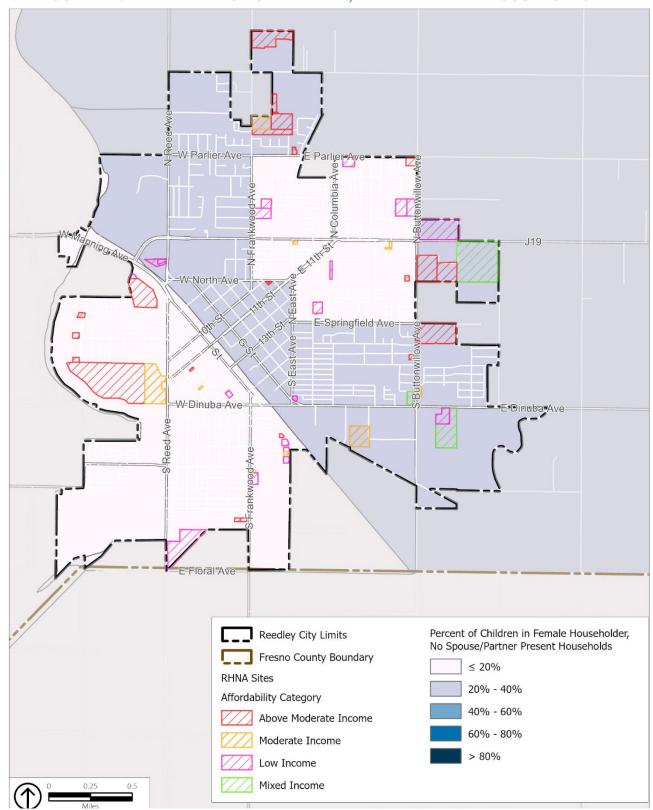


FIGURE 1L-9 CHILDREN IN SINGLE-PARENT, FEMALE-HEADED HOUSEHOLDS

Source: 2015-2019 ACS; City of Reedley, 2023

Approximately 29.5 percent of female-headed households earn household incomes below the poverty line, below the Fresno County rate of persons in poverty but higher than the statewide rate of 21.5 percent. In the census tract east of the San Joaquin Valley Railroad in Central City East, Duff and Buttonwillow, and South Columbia/East Early Avenue neighborhoods, 22.7 percent of the households are single female-headed households. In contrast, approximately 30.3 percent of single female-headed households in neighborhoods with older residential housing stock in close proximity to industrial and business uses adjacent to the rail line live below the poverty line. When overlaid with the rate of children under age 18 living in poverty (38.5 percent) and the presence of four affordable housing complexes and two public housing units in this area of the city, the data suggest that a concentration of single parent households in poverty may reside in these neighborhoods.

The relatively high rate of single female-headed households (19.7 percent) overlaid with the rate of children under age 18 living in poverty (45.2 percent) in the northeastern High Segregation and Poverty tract corresponds with a 28.4 percent poverty rate, suggesting that there also might be a concentration of single parent households in poverty residing in the North Haney, Red Beaut Avenue, Manning Avenue, TL Reed, North Pecan Avenue, and Rosewood Estates neighborhoods. The rate of single female-headed households with children in poverty in Reedley (4.8 percent of total households) is lower than the 7.3 percent of households in Fresno County, though fairly comparable to the 4.6 percent rate statewide. This may indicate that single-parent, female-headed households have greater access to affordable housing in Reedley than elsewhere in the county. In addition, all but the northeast census tract with the high segregation and poverty designation have resource opportunity designations of moderate to highest resource, which suggests that single female householders with children may be able to obtain housing in the vicinity of higher resource opportunities.

Single-person households constitute 12.4 percent of total households compared to 29.1 percent of households in Fresno County and 23.7 percent of households statewide. Seniors living alone, comprising 9.6 percent of households both county- and statewide, constitute 8.6 percent of Reedley's households and 41.5 percent of total senior households. Of the seniors living alone, 49.0 percent are homeowners and the remaining 51.0 percent are renters. Additionally, approximately 20.4 percent of all senior households have a median income below \$20,000, which is considered extremely low income for a household of two, indicating that there may also be a concentration of seniors in the eastern side of the city in areas of the city previously identified as having lower incomes and affordable housing resources within these lower income neighborhoods. This proportion of seniors living alone reflects the overall moderate presence of seniors in the city, who comprise 19.6 percent of the population and 20.6 percent of all households. These percentages are higher than eight of the other jurisdictions in the county and comparable to Fresno County's 19.5 percent senior population. These findings suggest that seniors may have aged in place and remain in their homes, both owner and renter, and there may be some available rental units accessible to seniors living alone: age restricted (Reedley Elderly, Sierra View Homes Retirement Community, Palm Village Retirement Community), affordable complexes, or market-rate rental properties. Additionally, access to services and amenities catering to senior needs appears to exist in the city as well as in the nearby city of Fresno, and

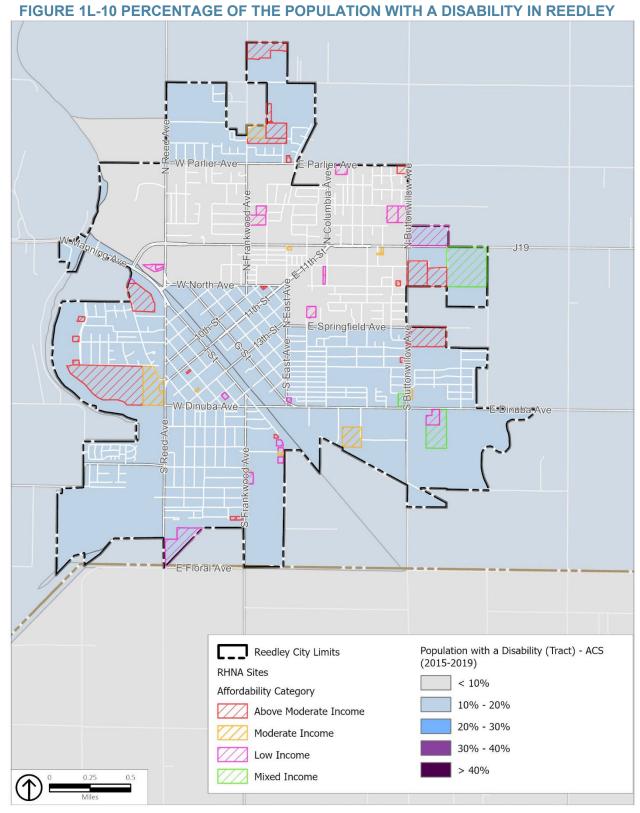
seniors may have more positive access to services and facilities compared to residents in the western part of the county.

To address the need for a variety of housing types and sizes the City has committed to **Programs 7, 12,** and **14** to encourage and facilitate development of a variety of housing types in predominantly single-family neighborhoods and areas of with higher rates of overpayment, including multi-bedroom units and ADUs, to provide an increased supply of affordable units throughout the city.

Disability Rates and Services

Persons with disabilities typically have special housing needs due to physical or developmental capabilities, fixed or limited incomes, and higher health costs. Seniors typically experience disabilities at higher rates. Approximately 11.1 percent of Reedley's population lives with one or more types of disabilities, less than the Fresno County rate of 12.9 percent and slightly above the state rate of 10.7 percent. The population of older residents (19.6 percent) in the city is comparable to the rate in Fresno County. Similarly, 40.6 percent of seniors experience one or more disabilities, also comparable to Fresno County's rate at 41.6 percent.

Residents living with disabilities on the western side of the city comprise 9.7 percent of the population, of whom 32.2 percent are seniors. Although seniors comprise only 8.1 percent of the total population in the western portion of the city, 37.7 percent report a disability, and many of these may reside in the Palm Village Retirement Community (Figure 1L-10, Percentage of the Population with a Disability in **Reedley**). In the eastern central/southern side of the city, the overall rate of disability is 12.1 percent. Seniors comprise 11.2 percent of the population in this tract—likely due to the presence of two agerestricted and four affordable housing complexes—and 49.9 percent of this age cohort experiences one or more disabilities, or 46.3 percent of all persons with disabilities in this tract. In the northeastern census tract, the rate of persons with disabilities is lower than in the city overall, at 7.8 percent. Seniors represent 8.9 percent of the population, and 41.3 percent of this senior population experiences one or more types of disability, comprising almost one-half (47.0 percent) of total persons with disabilities in this census tract. The Reedley College census tract in the northwest corner of the city has the lowest rate of disability (6.8 percent) and the lowest representation of seniors (7.6 percent). Approximately 24.7 percent of the disabled population are seniors, or 21.8 percent of the senior population are disabled in that tract. The spatial distribution of Reedley residents living with disabilities suggests that services and amenities, such as transit opportunities, facilities for disabled populations, and the existence of affordable living facilities are more accessible on the east side of the San Joaquin Valley Railroad.



Source: 2015-2019 ACS; City of Reedley, 2023

The incidence of persons with disabilities shifted between 2014 and 2020, decreasing in the northeastern census tract, remaining constant in the central and southeastern census tract, and increasing in the western, northern and eastern perimeter of the city. In 2014, the western side of the city had a disability rate of 10.4 percent compared to 12.9 percent in 2020, with seniors comprising 14.0 percent of the residents and 43.4 percent of total disabilities in this tract. The overall disability rate in the central and southeastern side remained stable, although the rate of disability among seniors increased slightly from 48.3 percent to 49.9 percent and represented 46.3 percent of total disabilities in 2020 compared to 37.9 percent in 2014. In contrast, the rate of persons with a disability decreased in the northeastern census tract, from 10.6 percent in 2014 to 7.8 percent in 2020. However, the representation of seniors residing in the tract increased from 7.2 percent to 8.9 percent, with a corresponding increase in the proportion of seniors comprising the disabled population, from 28.9 percent in 2014 to 47.0 percent in 2020. The overall rate of disability in the northwestern Reedley College census tract also decreased from 8.4 percent in 2014 to 6.8 percent in 2020, with a significant decrease in the proportion of seniors with a disability, from 45.5 percent of total persons with a disability in the tract to 24.7 percent, and from 30.8 percent of seniors residing in the area experiencing a disability to 21.8 percent in 2020.

As shown in Table 2-32, Disability by Type (2020), in Section 2: Housing Needs Assessment, ambulatory disabilities were the most prevalent type of disability in the City of Reedley, with 49.8 percent of the population with a disability reporting this difficulty. This was followed by independent living difficulties at 38.3 percent, cognitive problems at 35.9 percent, and hearing difficulties at 30.9 percent. Vision difficulties and self-care problems were reported at rates of 24.5 percent and 20.4 percent, respectively. The City of Reedley has a small population of residents with developmental disabilities (1.3 percent of total population), and approximately 63.3 percent are under 18 years of age and live at home with parents or a caregiver.

Residents with disabilities in the City of Reedley 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, and The Arc of Fresno and Madera Counties, located in Fresno, which serves and protects people with intellectual and developmental disabilities. Reedley residents also have access to the Dial-A-Ride program, operated by the local FCRTA subsystem, which offers transportation services to the elderly (65+), disabled, low income, and general public. Dial-A-Ride services are wheelchair equipped and operate Monday through Friday between 8:30 am and 4:15 pm, with fares of \$1.00 one-way or \$2.00 round trip. 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 provides connections to programs, services, and resources elderly residents can use to maintain and improve their quality of life as they age. For ongoing care, Reedley has 5 adult residential care facilities with a combined 28 beds, and an assisted living facility with 6 beds.

Access to Opportunity

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.

Reedley residents are served by the Fresno County Rural Transit Agency (FCRTA), providing fixed-route service on the Orange Cove Transit, Sanger-Reedley College Transit, Kingsburg-Reedley College Transit, as shown in **Figure 1L-11**, **Sites Inventory with FCRTA Bus Routes and Stops**. The City is also served by the Dinuba Connection, an FCRTA route provided in partnership with Dinuba Area Regional Transit (DART) (see Figure 3-24, Fresno County Rural Transit Agency Intercounty Routes).

Orange Cove Transit provides weekday service between Reedley and Fresno. Buses make two round trips daily, stopping in Reedley at the Reedley Shopping Center on the northwest corner of Manning Avenue and Buttonwillow Avenue, the Reedley Community Center, and Reedley College. Trips originate in Orange Cove and stop in Reedley at approximately 7:20 a.m. and 1:10 p.m. before traveling on to Parlier, Sanger, and Fresno. Return service departs from Fresno at approximately 10:00 a.m. and 3:45 p.m., stopping in Sanger and Parlier before arriving in Reedley at approximately 11:15 a.m. and 5:00 p.m., then traveling on to Orange Cove. Service is provided on 30-passenger, ADA wheelchair-accessible buses. Monthly passes for general service between Reedley and Fresno are \$112.00, with discounted fares available for senior, youth, and disabled residents at \$56.00 monthly. Transit service to Orange Cove, Sanger, and Parlier has the potential to be an important connection for farmworkers working at agricultural operations in these cities.

The Kingsburg-Reedley Transit line provides service between Reedley College and Kingsburg on weekdays, departing from Kingsburg at 7:00 a.m., 11:00 a.m., and 2:30 p.m. and making stops in Selma, Fowler, and Parlier before arriving at Reedley College after approximately 60 to 65 minutes. Return service departs from Reedley College at 9:15 a.m., 12:20 p.m., and 3:45 p.m., stopping again in Parlier, Fowler, and Selma before arriving in Kingsburg after approximately 60 to 65 minutes. Service is provided on 30-passenger, ADA wheelchair-accessible buses. Monthly passes for general service between Reedley College and Kingsburg are \$94.00, with discounted monthly student bus passes available through Reedley College at \$35.00. Transit service from Reedley to Parlier, Selma, and Kingsburg has the potential to be an important connection for farmworkers working at agricultural operations in these cities.

W-Parlier-Ave E-Springfield-Ave= -W-Dinuba-Ave E-Dinuba-Ave FCRTA Transit Routes RHNA Sites Coalinga Transit Affordability Category Dinuba Connection (DART) Above Moderate Income •• Huron Transit Moderate Income Kingsburg-Reedley Low Income Orange Cove Transit Mixed Income Sanger Express Reedley City Limits Southeast Transit - Westside Transit Transit Stops 1/2 Mile from Transit Stop

FIGURE 1L-11 SITES INVENTORY WITH FCRTA BUS ROUTES AND STOPS

Source: Caltrans 2020; FCRTA, 2023; City of Reedley, 2023

The Dinuba Connection is a route connecting Reedley and Dinuba, developed by the FCRTA in partnership with DART. Buses travel between Dinuba and Reedley on weekdays. Stops include the Dinuba Vocational Center, Adventist Medical Center, Reedley College, Palm Village Retirement Community, and Walmart. Dinuba Connection buses make approximately 14 round trips daily, departing hourly from Dinuba Transit Center at five minutes past the hour between 7:05 a.m. and 8:05 p.m. Reedley residents can use this line to access shopping, educational, and employment opportunities. Additionally, farmworkers may find it a useful connection to Dinuba-area agricultural operations. During the summer, service ends early, with the last bus departing Dinuba at 2:05 p.m.

With daily access to the city of Fresno, the FCRTA also provides Reedley residents with access to employment opportunities and connections to regional transit services, including Amtrak, Greyhound, and Fresno Area Express (FAX), which in turn provide connections within the metropolitan Fresno area and to Stockton, Bakersfield, and other regional hubs.

An additional vanpool service, CalVans, provides an agricultural vanpool service for \$2 per ride. Sponsored by California Vanpool Authority, CalVans supplies qualified drivers with late-model vans to drive themselves and others to work or school. The California Vanpool Authority pays for the gas, maintenance, repairs, and a \$10 million insurance policy. This program provides workers opportunities to live in one residence throughout the season regardless of where they are needed to work in the fields or packing plants.

AllTransit is a transit and connectivity analytic tool developed by the Center for Neighborhood Technology for the advancement of equitable communities and urban sustainability. The tool analyzes the transit frequency, routes, and access to determine an overall transit score at the city, county, and regional levels. AllTransit scores geographic regions (e.g., cities, counties, Metropolitan Statistical Areas) on a scale of 0 to 10, with 10 being complete transit connectivity. **Figure 1L-12**, **Reedley AllTransit Performance Score**, shows Reedley's AllTransit Performance score, including metrics representing average household transit access. Reedley's score is 2.2, demonstrating "very low" connectivity. **Table 1L-8**, **Fresno County Jurisdictions AllTransit Performance Scores**, shows transit accessibility in Reedley in relation to other Fresno County jurisdictions. Reedley's score is the second highest among cities in Fresno County, reflecting better connectivity to resources and opportunities for residents of Reedley. Further, as described in Section 3: Regional Assessment of Fair Housing, the AllTransit methodology may not fully reflect the transit opportunities available through private service providers. Among Fresno County jurisdictions, the city of Fresno represents an outlier both in terms of population size, degree of urbanization, and transit accessibility.

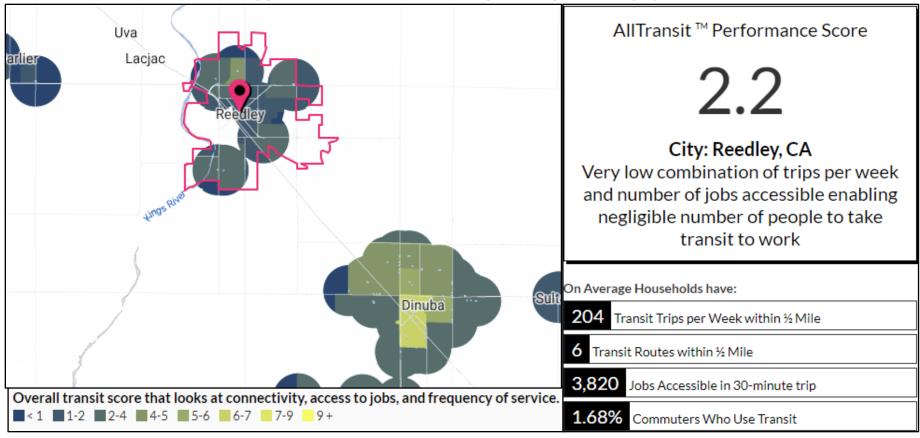


FIGURE 1L-12 REEDLEY ALLTRANSIT PERFORMANCE SCORE

Source: AllTransit.cnt.org, 2022

Table 1L-8 Fresno County Jurisdictions AllTransit Performance Scores

Jurisdiction	Score			
City of Fresno	5.0			
Fresno County	3.2			
Reedley	2.2			
Fowler	1.5			
Huron	1.2			
Clovis	1.1			
Coalinga	1.1			
Parlier	1.0			
Firebaugh	1.0			
Mendota	0.9			
Sanger	0.9			
Selma	0.7			
Kingsburg	0.7			
Kerman	0.1			
San Joaquin	0.0			

Source: AllTransit.cnt.org, 2022

Housing Mobility

Approximately 41.9 percent of occupied households in Reedley are renter-occupied, and rates of renter occupancy are unevenly distributed in Reedley. Renting households are found at the highest rates in the census tract to the northeast of the railroad and south of North Avenue (59.8 percent). Lower rates are found southwest of the railroad (26.6 percent), north of Parlier Avenue, and east of Buttonwillow Avenue (18.6 percent). As shown in Section 2: Housing Needs Assessment, Table 2-18, for 2022 the California Department of Finance (DOF) reported an overall vacancy rate of 6.8 percent in Reedley. Vacancy data are not available by tenure through the DOF; the 2020 ACS 5-year estimate indicates a rental vacancy rate of 0.4 percent and an ownership unit vacancy rate of 2.2 percent, with an overall vacancy rate of 5.0 percent, inclusive of units identified as other vacant units, such as seasonal homes and units not on the market. A healthy housing market is generally considered to have a 5.0 percent vacancy rate. ACS 5-year estimate vacancy rates draw on large sample sizes and may not precisely represent vacancy on the ground. Instead, these rates are presented as general estimates of approximate conditions in the local housing market.

In Reedley, a substantial proportion of vacant properties were categorized as being for seasonal use (either recreational or for seasonal laborers) or "other vacant," a category of properties that are vacant but not available for rent or purchase. Properties may be "other vacant" due to factors such as ongoing legal proceedings, active renovation or repair, abandonment, or an owner's preference for vacancy, among others. These categories of vacancy are accounted for in the overall vacancy rate estimate but are not included in the rental and ownership vacancy rate estimates, which only consider units immediately available for rent or purchase.

Reedley's very low rental vacancy rate indicates a tight rental market with few housing mobility opportunities for current and prospective renters. Similarly, the low ownership unit vacancy rate indicates an absence of available homes for sale in Reedley for prospective homebuyers.

The 2020 ACS 5-year estimate indicates that median gross rent is \$973 in Reedley, slightly lower than \$1,029 reported for Fresno County (see Section 2: Housing Needs Assessment). However, Reedley's vacancy rates and median rent are consistent with several other comparable Fresno County jurisdictions (see Section 2: Housing Needs Assessment). This suggests that residents in Reedley have similar mobility options overall as other parts of the region. Approximately 43 households in Reedley are reported as utilizing Housing Choice Vouchers (HCVs); however, several census tracts that intersect the jurisdiction do not have HCV data, suggesting that this figure may not be accurate.

Median rent in Reedley rose from \$799 in 2010 to \$973 in 2020, reflecting an increase of 21.8 percent over the ten-year period and indicating that renting costs have risen in recent years. Similarly, as found in Section 2: Housing Needs Assessment, Table 2-22, Home Sales Recorded in 2021-22, home prices in Reedley increased by 4.9 percent between 2021 and 2022. Additionally, a shortage of available housing units for rent and for sale may indicate limited mobility options for prospective and existing Reedley residents seeking ownership opportunities.

As of the 2016-2020 ACS, 24.3 percent of Hispanic or Latino households of any race in Reedley had incomes under the poverty line, as did 35.3 percent of Asian households and 20.1 percent of Black or African-American households, compared to 6.6 percent of White, non-Hispanic households. Therefore, encouraging housing mobility through the use of Housing Choice Vouchers can also help to mitigate the potential for any racial and ethnic isolation that could result from overconcentration of lower-income households in any one area.

In response to rising housing costs, the City has included several programs to promote construction of affordable housing options and facilitate mobility for lower- and moderate-income households. These programs include **Program 7** to facilitate the expansion of the affordable housing inventory, **Program 23** to connect lower-income families with homebuyer assistance resources, and **Program 25** to work with the Housing Authority to disseminate information to landlords and property owners on incentives for participating in the HCV program and encouraging them to market their properties as accepting HCVs.

Employment Opportunities

The HUD jobs proximity index measures employment accessibility in residential neighborhoods by calculating distances to potential job locations within the area, with larger employment centers weighted more heavily, and factoring in the population size of the local workforce. According to this index, most primarily residential areas in Reedley score between the 19th and 42nd percentiles, indicating moderate to low proximity to employment opportunities (**Figure 1L-13**, **Jobs Proximity Index**). A small section of the city in the downtown area scores the lowest, and areas west of Reed Avenue score the highest. Reedley is relatively close to the city of Fresno, the region's primary employment center and 24 miles to the northwest,

suggesting that Reedley residents may have closer access to employment opportunity than is reflected in the HUD index.

Reedley's primary industry is agriculture. Additionally, Reedley College serves as a stable, long-term driver of local economic activity. Approximately 79.6 percent of Reedley residents commute outside of the city for work, and 20.4 percent of residents both live and work within city limits. This figure has remained consistent over time—in 2010, 78.8 percent of Reedley residents commuted outside of the city for work.² Reedley residents primarily work in Agriculture, Forestry, Fishing and Hunting (21.6 percent), Health Care and Social Assistance (13.7 percent), and Educational Services (11.8 percent).³ Reedley is in a central location in Fresno County relative to several other jurisdictions and includes or is near several employment opportunities. In total, 71.3 percent of residents live within 24 miles of their workplace, an area that includes the cities of Fresno, Parlier, Dinuba, and Sanger. This includes approximately 43.7 percent of Reedley residents who live within 10 miles of their place of employment. Though 19.5 percent travel more than 50 miles to work, this is a lower proportion than the populations of many jurisdictions in the county. According to the ACS, the jobs-housing ratio in Reedley is relatively balanced at 0.94, remaining consistent with the ratio of 0.93 in 2010. Given that nearly three-quarters of Reedley residents live near their place of employment, this jobs-housing ratio likely suggests that the supply of housing units in Reedley meets the needs of most employees in the area. However, there is still a slight shortage of housing to support the entire employee base.

Commercial activity within Reedley is focused along 11th Street, Manning Avenue, and in the areas along the rail line. Given the nature of the city's main industries, many Reedley residents will likely continue to work outside of the city. The City's zoning map (**Figure 1L-14, Zoning in Reedley**) shows that the majority of land in the city is designated for residential uses. The prevalence of residential uses with strong access to Fresno's job market reflects the city's relatively high scores for HUD's jobs proximity index.

To facilitate access to economic opportunities, the City has included **Program 8** to provide housing for farmworkers and their families, particularly during peak harvest seasons, **Program 9** to require 15 percent of new assisted affordable units be prioritized for qualified farmworker households, and **Program 27**, to coordinate with FCRTA to help connect seniors and other residents to services and employment in the city and throughout the county, facilitate place-based revitalization through the City's Capital Improvement Plan, and take measures to facilitate positive learning environments.

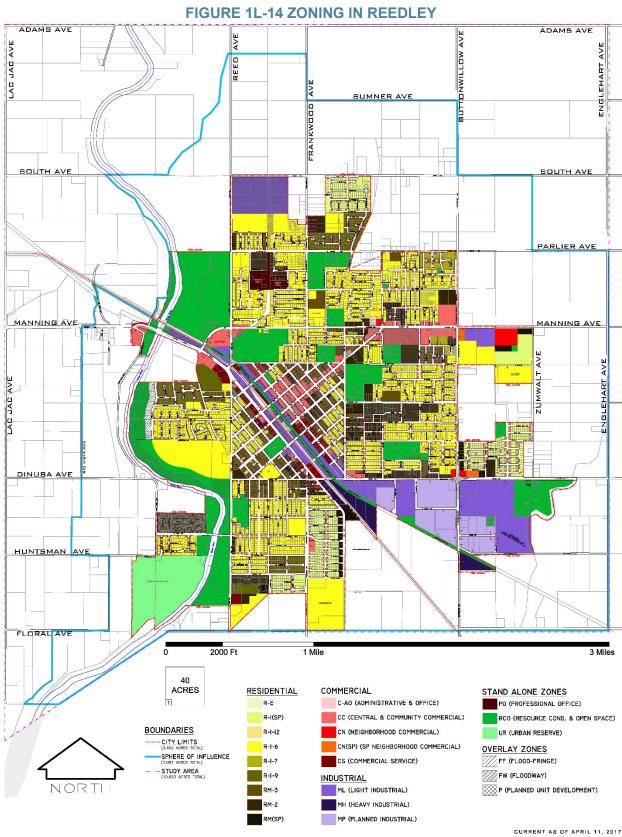
² U.S. Census Bureau, LEHD Origin-Destination Employment Statistics (2002-2019), LODES 7.5, Washington, DC: U.S. Census Bureau, Longitudinal-Employer Household Dynamics Program, 2022, accessed September 2022, https://onthemap.ces.census.gov.

³ U.S. Census Bureau, LEHD Origin-Destination Employment Statistics (2002-2019), LODES 7.5, Washington, DC: U.S. Census Bureau, Longitudinal-Employer Household Dynamics Program, 2022, accessed September 2022, https://onthemap.ces.census.gov.

E-Springfield-Ave W-Dinuba-Ave-E Floral Ave Reedley City Limits Jobs Proximity Index (2014-2017) - HUD (Block Group) Fresno County Boundary < 20 (Furthest Proximity) **RHNA Sites** 20 - 40 Affordability Category 40 - 60 Above Moderate Income 60 - 80 Moderate Income > 80 (Closest Proximity) Low Income Mixed Income

FIGURE 1L-13 JOBS PROXIMITY INDEX

Source: 2014-2017 HUD; City of Reedley, 2023



Source: City of Reedley, 2017; accessed October 2022

Educational Opportunities

Reedley students are served by the Kings Canyon Unified School District (KCUSD), which has 19 public schools reported on by the California Department of Education (CDE), including 11 elementary schools, 3 middle schools, and 2 high schools. Additionally, the KCUSD offers several alternative and early education programs, including Kings Canyon Adult School, Kings Canyon Online, KC Kids, the Guiding and Learning Center, and the Early Learning Program. KCUSD schools are in the cities of Reedley and Orange Cove as well as surrounding communities.

Of the seven schools within Reedley city limits for which English Language Arts (ELA) and Mathematics performance scores were available in 2019, CDE reported that Thomas Law Reed Elementary, Jefferson Elementary, General Grant Middle, and Reedley High scored above state grade-level standards for ELA, All other scores for schools in Reedley were below the state-grade level standards for ELA, mathematics, or both (see Table 1L-9, Performance Scores for Kings Canyon Joint Unified School District, 2019).

The proportion of the student population at each school within Reedley that was considered socioeconomically disadvantaged in 2019 was generally high, ranging from 72.7 percent at Thomas Law Reed Elementary to 96.4 percent at Lincoln Elementary. Thomas Law Reed Elementary is in an area with a median household income of \$80,521 and a TCAC/HCD Education Domain Score in the 65th percentile. Lincoln Elementary is in an area where median household income is \$45,066, though the TCAC/HCD Educational Domain Score is similarly in the 64th percentile. Within the jurisdiction of Reedley, TCAC/HCD Education Domain Scores range between the 57th and 66th percentiles. Within Reedley, the spatial distribution of schools in relation to household median income does not appear to impact educational outcomes, and students living in different parts of Reedley have access to similar education outcomes (Figure 1L-3, Local TCAC/HCD Educational Domain Score).

Table 1L- 9 School Performance Scores in Reedley

School Name	ELA Score	Math Score	Chronic Absenteeism Rate	Suspension Rate	Socio- economically Disadvantaged	Foster Youth	English Learners
General Grant Middle	+19.7	-2.3	2.2%	2.8%	90.3%	0.2%	22.5%
Jefferson Elementary	+1.2	-3.0	7.2%	0.2%	93.6%	0.0%	58.4%
Lincoln Elementary	-37.0	-45.0	6.6%	1.4%	96.4%	0.0%	56.6%
Mountain View (Alternative)	-133.0	-207.6	32.6%	0.0%	89.7%	1.4%	26.0%
Reedley High	+60.4	-21.4	-	5.5%	80.8%	0.1%	8.0%
Thomas Law Reed Elementary (K-8)	+10.2	-4.1	3.3%	1.0%	72.7%	0.3%	29.7%
Washington Elementary	-21.5	-28.1	5.6%	2.1%	88.8%	0.6%	43.8%

Source: California Department of Education, 2019

In addition to educational opportunities for youth, Reedley residents have access to the Reedley Training Center, which provides online and in-person training in a variety of skills-based topics to promote skills for employment, productivity, and performance. Courses include professional development, medical programs, agriculture and Farm Labor Contractor classes, and continuing and new education.

Environmental Health

The Office of Environmental Health Hazard Assessment (OEHHA) reports CalEnviroScreen 4.0 scores for Reedley demonstrating relatively adverse environmental conditions, with census tracts in and around Reedley scoring between the 79th and 95th percentiles (**Figure 1L-15**, **CalEnviroScreen Scores**). In Reedley, areas on the northeast side of the city have more adverse environmental conditions than other areas, especially the southwest side. This pattern is consistent with the spatial pattern demonstrated by other indicators of access to opportunity, such as median household income, poverty status, and proximity to jobs. This indicates that residents in Reedley have widely varying access to positive environmental conditions, dependent on the section of the city they live in.

The primary indicators leading to high scores as reported by OEHHA's CalEnviroScreen, are, in order of significance, ozone, PM_{2.5}, pesticides, lead in housing, groundwater threats, and hazardous waste. Reedley is in a sparsely populated area, with few industrial uses and relatively low pollution from vehicular emissions. However, commercial agriculture and natural resource extraction close to Reedley may contribute to adverse environmental conditions. Most residential areas in Reedley fall within the boundaries of areas considered SB 535-qualifying disadvantaged communities, that is, in the 25 percent highest scoring census tracts in CalEnviroScreen 4.0, census tracts previously identified in the top 25 percent in CalEnviroScreen 3.0, and census tracts with high amounts of pollution and low populations. SB 535 communities in Reedley are found in all areas of the city aside from the neighborhoods immediately to the east of Reedley College and areas east of North Buttonwillow Drive. This indicates that, compared with statewide averages, Reedley represents an area of potential concern regarding fair housing and disproportionate exposure to environmental hazards and a concentration of vulnerable populations.

The Federal Emergency Management Agency (FEMA) develops flood maps that identify areas with the highest risk of flooding, differentiating by the degree of severity and frequency of flooding anticipated. In Reedley, the western edge of the city along the Kings River has been identified as Zone AE, or areas with a 1 percent annual chance of flooding (**Figure 1L-16**, **Flood Hazard Zones**). These areas tend to have comparatively higher median incomes and lower rates of poverty than the western and southern portions of the city, suggesting that lower-income households are not disproportionately concentrated in flood-prone areas. Flooding from the Kings River is not uncommon and can inundate recreational facilities and properties along the river.

To improve environmental conditions and concentrations of vulnerable populations and provide flood prevention protection, **Program 5** commits to maximize the use of the City's CDBG allocated share to address deficient or non-existent infrastructure in support of housing and **Program 27** includes posting information about flood-related resources on the City's website and targeting outreach to neighborhoods at risk of flooding. Through **Program 28**, the City shall promote environmental justice and maintain and revitalize neighborhoods citywide, with a particular focus on areas of lower opportunity and concentrated poverty, including the north and east sides of the city, as well as parts of the downtown area. Efforts shall include implementing the City's General Plan Community Health Policies and Conservation, Open Space, Parks and Recreation Policies.

The intent of these programs is to facilitate place-based revitalization and promotion of healthy environments for new and existing housing.

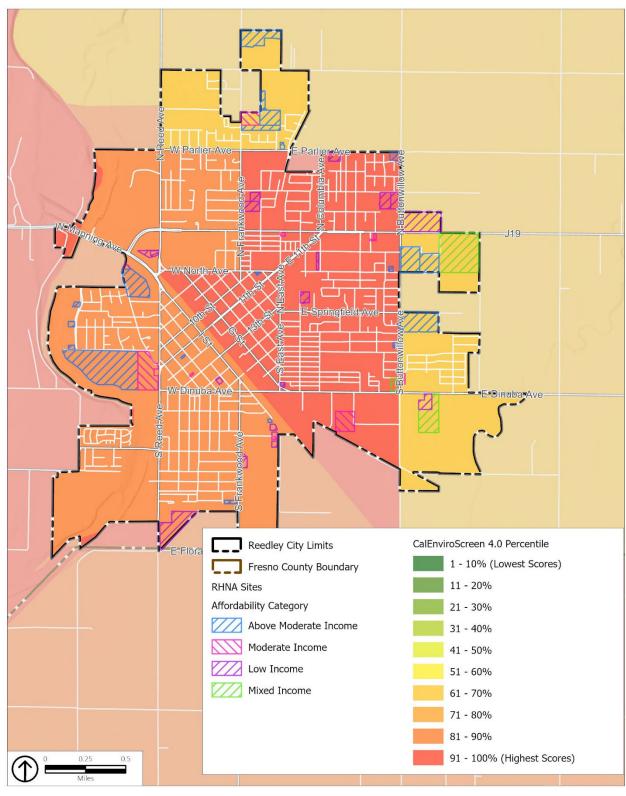


FIGURE 1L-15 CALENVIROSCREEN SCORES

Source: OEHHA, 2021; City of Reedley, 2023

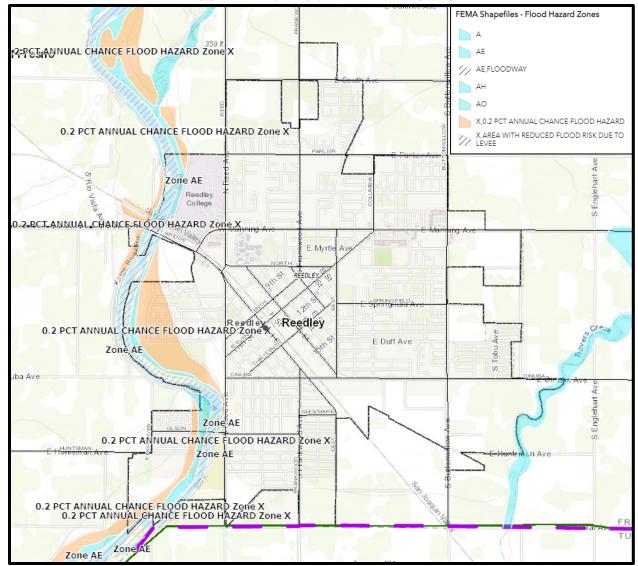


FIGURE 1L-16 FLOOD HAZARD ZONES

Source: FEMA 2021; Fresno County, 2021; accessed November 2022

Disproportionate Housing Need and Displacement Risk

Overcrowding

Overall, approximately 7.7 percent of households in Reedley are considered overcrowded, which is a higher proportion than in Fresno County as a whole (6.1 percent). However, 3.2 percent of Reedley households are considered severely overcrowded, similar to the 3.6 percent of households in Fresno County. Renter households in Reedley experience overcrowding at almost twice the rate (10.5 percent) of homeowners (5.7 percent), and experience severe overcrowding at a notably higher rate, with 5.7 percent of renters considered severely overcrowded compared to 1.3 percent of homeowners.

As shown on **Figure 1L-17**, **Overcrowding in Reedley**, the ACS estimates that there is a significantly higher rate of overcrowding in the eastern portion of the city northeast of the Southern Pacific Railroad and east of N. Frankwood Avenue, with approximately 20.9 to 21.9 percent of households in this area experiencing overcrowding. Most of the city's multifamily apartment housing is in this area, which may explain the higher rate of overcrowding because multifamily units are typically smaller than single-family homes and therefore are more likely to be overcrowded. However, according to the 2016-2020 ACS, approximately 66.3 percent of housing units in Reedley have three or more bedrooms, which typically reduces the need for occupants to share rooms. Therefore, the rate of overcrowding may be attributed to the cost of housing rather than the availability of larger units. High costs may prevent lower-income households from securing larger units even when available.

The rate of overcrowding in Reedley has decreased significantly over time, from 14.2 percent in 2010 to 7.7 percent in 2020. However, the rate of severe overcrowding has increased from 2.5 percent of households to 3.2 percent. While both renters and homeowners have been impacted by this, renters have been impacted at a higher rate. As previously discussed, the decrease in standard overcrowding and increase in severe overcrowding may be indicative of rising housing costs, presenting a barrier to securing housing in general, and particularly larger units for larger families.

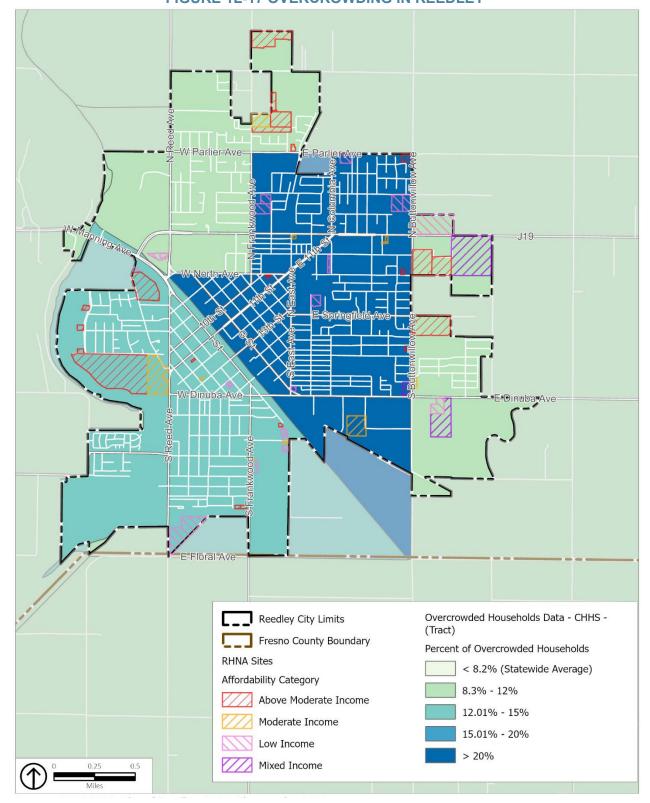


FIGURE 1L-17 OVERCROWDING IN REEDLEY

Source: California Health and Human Services, 2022; City of Reedley, 2023

Overpayment

In Reedley, 23.0 percent of households are cost burdened, and 18.4 percent are severely cost-burdened, for a total of 41.4 percent of all households (Table 1L-10, Cost Burden in Reedley, 2010-2018). Of these households, approximately 56.1 percent are renters, though renters comprise only 41.9 percent of households in the city. In total, 32.8 percent of renters are cost burdened and 27.0 percent are severely cost burdened, compared to 17.4 percent and 13.0 percent of homeowners, respectively. The disproportionately high rate of overpayment among renters is reflected in Figure 1L-18, Percentage of Renters Overpaying. In Reedley, renter overpayment is prevalent throughout most of the city, though highest to the east of the railroad in areas with the highest rates of poverty (see Figure 1L-6, Local Poverty Rate) and neighborhoods identified as Areas of High Segregation and Poverty (Figure 1L-8, Area of High Segregation and Poverty), indicating a disproportionate displacement risk for lower-income renters in this area of the city. In contrast to the prevalence and concentrations of renter overpayment, homeowner overpayment is relatively low and consistent throughout Reedley (Figure 1L-19, Percentage of Homeowners Overpaying). Unlike neighboring cities of Parlier, Selma, and Dinuba, there are no areas within Reedley in which more than 40 percent of homeowners are overpaying for housing.

Table 1L- 10 Cost Burden in Reedley, 2010-2018

	Cost Burdened			Severely Cost Burdened		
Household Type	2010	2018	Percent Change	2010	2018	Percent Change
All Households	20.2%	23.0%	2.8%	18.4%	19.1%	0.7%
Renters	28.3%	32.8%	4.6%	27.0%	30.6%	3.6%
Homeowners	15.0%	17.4%	2.4%	13.0%	12.3%	-0.8%
Lower-Income Households	31.0%	37.6%	6.6%	38.4%	37.4%	-1.0%
Renters	37.2%	38.9%	1.8%	38.3%	43.2%	4.8%
Homeowners	20.7%	35.8%	15.1%	37.9%	30.4%	-7.5%
Moderate-Income Households	25.5%	25.3%	-0.3%	4.8%	5.6%	0.7%
Renters	21.3%	35.8%	14.5%	0.0%	0.0%	0.0%
Homeowners	27.6%	20.6%	-6.9%	7.1%	8.4%	1.3%
Above Moderate-Income Households	8.2%	4.8%	-3.4%	2.9%	1.6%	-1.3%
Renters	0.0%	4.5%	4.5%	0.0%	0.0%	0.0%
Homeowners	9.9%	4.8%	-5.0%	3.4%	1.9%	-1.5%

Sources: CHAS 2006-2010 and 2014-2018

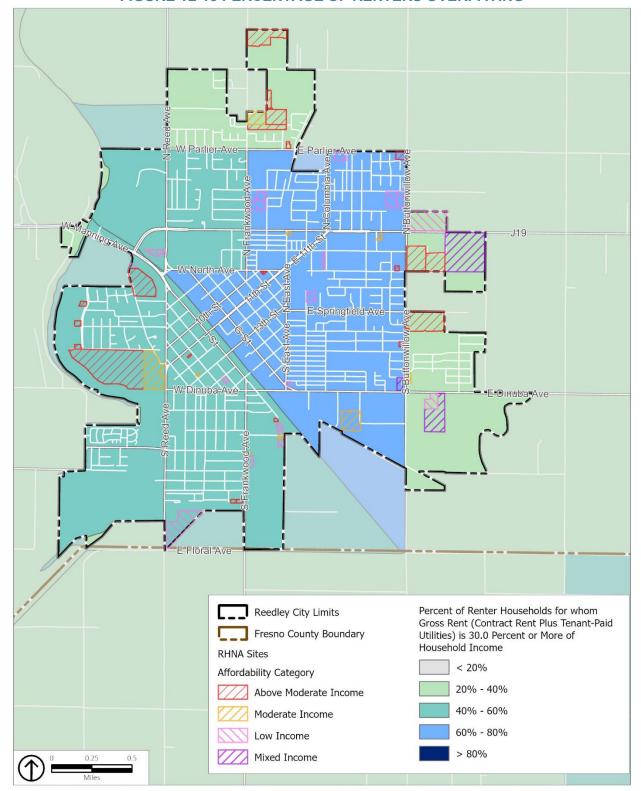


FIGURE 1L-18 PERCENTAGE OF RENTERS OVERPAYING

Source: 2015-2019 ACS; City of Reedley, 2023

E-Parlier-Ave -W-Parlier-Ave-J19 -W-North-Ave-E-Springfield-Ave--W-Dinuba-Ave E-Dinuba Ave E Floral Ave Reedley City Limits Percent of Owner Households with Mortgages whose Monthly Owner Costs are Fresno County Boundary 30.0 Percent or More of Household Income **RHNA Sites** < 20% Affordability Category 20% - 40% Above Moderate Income 40% - 60% Moderate Income 60% - 80% Low Income > 80% Mixed Income

FIGURE 1L-19 PERCENTAGE OF HOMEOWNERS OVERPAYING

Source: 2015-2019 ACS; City of Reedley, 2023

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. These households are most at risk of displacement due to more limited flexibility in responding to changes in income or rent. In Reedley, 37.6 percent of all lower-income households are cost burdened and 38.4 percent are severely cost burdened, for a total of 76.0 percent of all lower-income households experiencing some degree of cost burden (**Table 1L-10**, **Cost Burden in Reedley**, **2010-2018**). Lower-income renters experience overpayment at a slightly higher rate, with 38.9 percent of renters overpaying compared to 25.8 percent of homeowners. Overpayment rates drop to 25.3 percent of moderate-income households and 4.8 percent of above moderate-income households, reflecting the concentration of overpayment in neighborhoods with the highest rates of poverty.

Since 2010, lower-income households as a whole have experienced an increase in overpayment while moderate- and above moderate-income households have experienced a decrease. However, severe overpayment rates have increased for both lower- and moderate-income households. The highest rate of increase in overpayment has impacted lower-income homeowners and moderate-income renters. As both moderate- and above moderate-income homeowner overpayment has decreased, lower-income homeowners face the greatest risk of displacement among all income groups and the greatest barriers to purchasing a home. Given the concentration of poverty in eastern Reedley, this may suggest a shortage of affordable homeownership opportunities as well as a concentration of relatively affordable housing options in this area of the city.

While home value data from 2010 are not available, in May 2014, the median home value in Reedley was \$181,664, which had increased by 87.5 percent to \$340,642 in 2022 for an average annual increase of 10.9 percent, according to Zillow. This increase is reflected in the rising rate of overpayment among lower-income homeowners. Data on market rate rental prices is more limited in Reedley; however, an apartment rent survey conducted by City staff in 2022 supports the assumption that housing price increases have impacted rental units as well, particularly given the rising rates of overpayment among renters. Whereas the ACS estimates that the median gross rent increased from \$870 in 2015 to \$973 in 2020, for an average annual increase of 2.4 percent, the rental survey found that market rate one-bedroom units were approximately \$1,450 per month and two-bedroom units ranged from \$800 to \$1,650 per month, well above the ACS estimates for 2020. Moderate-income renters have been most impacted by rising rental costs, while the increase in median home value has primarily impacted lower-income households.

To address the challenges lower-income households may face in acquiring affordable rental and homeownership housing, the City has included **Program 11** to work with property owners of deed-restricted units to preserve affordability, **Program 23** to aid lower-income families in identifying homebuyer assistance resources, and **Program 25** to work with the Housing Authority to disseminate information to landlords and property owners on incentives for participating in the HCV program.

Substandard Housing Conditions

Approximately 59.1 percent of Reedley's housing units are over 30 years old, and 32.1 percent of units are over 50 years old (Table 2-19, Age of Housing Stock (2020), in Section 2: 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. The oldest housing units in Reedley are largely concentrated in the center of the city on either side of the railroad, between W. North Avenue to the north, W. Dinuba Avenue to the south, S. East Avenue to the east, and S. Reed Avenue to the west. This area is closest to the original and current commercial district and the railway that brough early growth to the area. While considered a moderate resource area, this portion of the city and others have a median income below the state median. Further, the portion to the north of the railroad has the highest rate of poverty in Reedley. Based on these factors, it is likely that many households do not have the financial capacity to complete needed repairs on aging homes.

Another measure of substandard housing conditions is the presence of kitchen and plumbing facilities. The 2015–2019 ACS estimated that no owner-occupied units in Reedley lack a complete kitchen or plumbing, but 40 renter-occupied units do, all of which are occupied by extremely low-income residents. These units account for approximately 0.6 percent of Reedley's total housing stock and 1.4 percent of renter-occupied units, indicating that lower-income renters, particularly extremely low-income, are disproportionately burdened by housing conditions.

To maintain the quality of existing housing in the city and reduce the risk of displacement of existing tenants or homeowners, the City will promote available housing rehabilitation resources and conduct targeted outreach to inform homeowners and rental property owners through **Programs 20, 21,** and **22**.

Homelessness

In January 2022, the Fresno-Madera Continuum of Care (FMCoC) published its Homeless Census and Survey Report (Point-in-Time [PIT]) count, which estimated 3,938 persons experiencing homelessness in Fresno County. Of that number, 1,728 persons were sheltered homeless and 2,210 were unsheltered homeless (Table 2-35, Total Unsheltered and Sheltered Homeless Count: Fresno County (2022), in Section 2: Housing Needs Assessment). Of this population, 3,397 individuals were counted in the city of Fresno and the remaining 541 in the rest of the county.

Throughout the FMCoC area, which includes Madera County, approximately 60.0 percent of the homeless population identified as male, 29.0 percent as female, and 1.0 percent as transgender. Approximately half of the population identified as Hispanic, 6.0 percent identified as Native American or Alaska Native, 3.7 percent as Asian, 15.6 percent as Black or African American, 0.8 percent as Native Hawaiian or Pacific Islander, 60.6 percent as White, and 12.8 percent as multiracial or other race. Additionally, 205 people, or 4.9 percent of the homeless population, were veterans, 15.0 percent were survivors of domestic violence, and 19.0 percent had a serious mental illness. While the age of homeless persons was reported generally, seniors were not identified. The PIT report does not distinguish the characteristics of the homeless

population in Fresno County, so it is assumed that these statistics generally represent the Fresno County population. Further, the 2022 PIT does not identify the locations of individuals in the remainder of the county. However, in 2021 the County of Fresno released a Homelessness Update that identified 30 homeless persons in Reedley, approximately 15.3 percent of the homeless population in the "rural informal county," which includes the cities of Coalinga, Firebaugh, Fowler, Huron, Kerman, Kingsburg, Mendota, Orange Cove, Parlier, Reedley, Sanger, and Selma and the unincorporated communities of Raisin City and West Park. In January 2023, the City of Reedley Police Department Homeless Outreach Supervisor estimated that 38 homeless individuals live in or near Reedley, including 8 within city limits and 30 on the edges of the city.

Table 1L-11, Demographic Characteristics of Homeless Population, 2022, identifies the proportion of each of protected characteristics identified in the 2022 PIT compared to the proportion in each Fresno County jurisdiction's population, to identify whether any protected classes are disproportionately represented as part of the homeless population. The percentages for a protected characteristic population in **bold** are overrepresented in the homeless population compared to that jurisdiction's total population. It is worth noting that, given the small size of the homeless population in Reedley, it is unlikely that all protected characteristics are represented. There are currently no emergency shelters within the city, and the nearest shelter is in the nearby city of Dinuba. Potential emergency shelter sites identified in Table 1L-22 are within walking distance from essential services such as schools, Head Start programs, community centers, and employment opportunities. This is also true of many other areas zoned ML, CS, CC, or CN, which permits emergency shelters. City Staff noted that community members experiencing homelessness frequently congregate near several shopping centers in the city as well as the Reedley Parkway in downtown area, which puts them in close proximity to commercial areas and greenspace. The Fire Department has indicated that some community members experiencing homelessness also sometimes camp in privately-owned orchards in the area near the intersection of South Buttonwillow and Manning Avenues. There are grocery stores and other commercial centers in this area as well as a health care center. This area is also along the transit route that connects to the city of Dinuba.

Table 1L- 11 Demographic Characteristics of the Homeless Population, 2022

Jurisdiction	diction Veteran Mental Hispanic American/Alaska Native		Asian Black/African American		Native Hawaiian/Pacific Islander	White	Other/Multiple Races			
Total Homeless	4.9%	19.0%	50.0%	6.0%	3.7%	15.6%	0.8%	60.6%	12.8%	
Clovis	7.0%	4.7%	32.7%	0.2%	10.7%	2.6%	0.2%	49.5%	4.0%	
Coalinga	4.4%	5.1%	62.0%	2.0%	1.9%	2.9%	0.5%	28.2%	2.6%	
Firebaugh	1.3%	2.2%	94.1%	0.0%	0.1%	0.0%	0.0%	5.8%	0.1%	
Fowler	6.4%	3.9%	65.2%	0.3%	9.9%	0.4%	0.0%	19.8%	4.4%	
Fresno	5.1% 6.3% 49.7% 0.5%		0.5%	14.0%	6.9%	0.1%	26.1%	2.7%		
Huron	1.1%	1.8%	94.5%	1.8%	0.0%	0.3%	0.0%	3.4%	0.0%	
Kerman	3.9%	5.7%	81.7%	0.0%	4.4%	0.3%	0.0%	12.0%	1.4%	
Kingsburg	7.0%	4.0%	47.7%	0.0%	7.9%	0.3%	0.0%	41.0%	2.7%	
Mendota	0.5%	2.2%	96.0%	0.1%	0.0%	0.0%	0.0%	3.6%	0.3%	
Orange Cove	7.0%	2.6%	95.3%	0.0%	0.0%	1.2%	0.3%	3.0%	0.1%	
Parlier	1.1%	2.4%	97.7%	0.0%	0.2%	0.0%	0.0%	1.8%	0.2%	
Reedley	4.1%	4.0%	79.3%	0.2%	2.3%	1.5%	0.1%	14.2%	2.4%	
Sanger	3.6%	3.6%	80.5%	0.5%	3.0%	0.0%	0.3%	15.0%	0.7%	
San Joaquin	0.8%	1.5%	97.5%	0.0%	0.0%	1.0%	0.0%	1.5%	0.0%	
Selma	3.6%	3.5%	85.0%	0.1%	1.8%	0.9%	0.0%	10.7%	1.6%	
Unincorporated County	5.7%	4.8%	47.7%	0.6%	7.5%	2.0%	0.1%	39.6%	2.5%	

Sources: FCOG Data Packet, 2022; Fresno/Madera Continuum of Care, 2022; 2016-2020 ACS

As seen in **Table 1L-11**, **Demographic Characteristics of Homeless Population**, **2022**, all protected characteristics are overrepresented in the majority of Fresno County jurisdictions, and individuals with mental disabilities and residents that identify as Native American, Alaska Native, Black, African American, Native Hawaiian, Pacific Islander, White, or Other/Multiple Races are overrepresented in all Fresno County jurisdictions. 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 1L-12**, **Services to Address Homelessness**.

Table 1L- 12 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	
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	

Service/Resource	Description	Operator	Location	
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	
Reedley College Tiger Pantry	Food pantry service available to students at Reedley College.	Reedley College	Reedley	
Family Assistance in Transitional Housing (FAITH House)	Emergency services to displaced families, such as short-term housing, food, clothing, life skills training, coaching, and spiritual guidance.	Serve Reedley	Reedley	
Community Resource Network	Hub to connect people to resources and training opportunities, and for residents to seek assistance from others.	Serve Reedley	Reedley	

Emergency shelters also include Marjaree Mason Center, Fresno Rescue Mission, Evangel Home Inc., and Plaza Terrace.

To address the housing needs of the homeless population in the city and region, the City has included **Program 3** to work with neighboring cities, the County, and other agencies to complete a biannual Point-in-Time count and develop programs targeting homelessness, and **Program 15** to remove barriers to the provision of emergency shelters.

Farmworkers

As discussed in the Regional Assessment of Fair Housing, farmworkers are considered a special needs group because they traditionally earn low wages and often migrate between farms, resulting in many farmworkers living in overcrowded and substandard housing conditions. Although Fresno County's overall economy has historically been largely based on agricultural operations, the number of farmworkers living in each of the jurisdictions in the county in more recent years varies depending on location, size, and diversification of their individual economic base. Further, prior to the COVID-19 pandemic, the industry started shifting toward recruiting and employing H-2A visa workers, many of whom are from Mexico and Central America. However, farmworkers are essential to Fresno County's and Reedley's economies as well as to local and national food supplies, and their needs for safe and affordable housing resources must be addressed.

The 2017 Census of Agriculture identifies 306 farm operations within the 93654 zip code, which includes Reedley and unincorporated land, particularly to the northeast between Orange Cove and Parlier, extending to the northeast beyond State Route 180. There are also 51 farm operations west of Reedley in the adjacent 93648 zip code, which includes the city of Parlier. While some of the farm operations in these zip codes are outside of the City of Reedley, it is possible that some of these facilities, particularly those close to Reedley, employ farmworkers that reside or use resources in the city.

According to the 2016-2020 ACS, 27.2 percent of the labor force in Reedley is employed in agriculture, forestry, fishing and hunting, and mining, a lower proportion than in other western jurisdictions in Fresno County (see Table 2-39, Estimated Farmworkers 2020, in the HNA). While it is possible that not all the workers in this sector are engaged in farm labor, the data allows comparisons between jurisdictions and within Reedley to gauge segments of the population at risk of overpayment, overcrowding, substandard housing conditions, or displacement.

Based on the most recent (2022) farmworker employment figures collected by the California Employment Development Department (EDD), there are 96,300 farmworkers employed throughout the county, yet housing facilities for only 2,540 occupants were contracted by H2-A employers, and farm operators, according to the HCD Employee Housing Facilities Permit Services database. Although this is equivalent to only about 2.6 percent of farmworker employment countywide, it is important because H2-A workers must be provided with housing accommodations. 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.

The Phase 1 COVID Farmworker Survey Report by the California Institute for Rural Studies, published in February 2021, estimates that undocumented workers comprise approximately 50 percent of workers statewide. They are predominantly Mexican, and the majority are Mixteco and Trique indigenous non-Spanish-speaking people. According to "In the Valley of Fear," published in December 2018 on workingimmigrants.com, most of the farmworkers in the San Joaquin Valley have been working the fields for at least a decade and have established families in the vicinity of their workplace.

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, the County surveyed 240 farmworkers and 170 farm employers. There were no respondents to the Fresno County Farmworker Survey who lived in Reedley. Countywide, 37.0 percent of respondents reported being citizens, 38.2 percent reported being permanent residents, 16.0 percent identified their status as undocumented workers, 6.3 percent did not respond, and 1.3 percent had H-2A visa status. Due to the lack of respondents residing in or near Reedley, a definitive determination of the proportion of undocumented workers cannot be made; therefore, it is likely that the survey's representation of undocumented workers throughout Fresno County may apply to the farmworker population in Reedley and surrounding communities.

According to the EDD, the most recent data from 2014 measured median wage for farmworkers at \$13.44 per hour or approximately \$25,804 per year for full-time work, which is considered extremely low income, correlating with the 2019 poverty threshold of \$25,750. Seasonal workers without a year-round income could have lower incomes. The median income in Reedley is \$45,850, and 18.4 percent of the population live below the poverty threshold. While 79.1 percent of the households in the city are Hispanic, 92.1 percent of the total households in poverty are Hispanic households. The findings from the Farmworker Survey indicate that 99.6 percent of farmworkers surveyed countywide are Hispanic. When the ACS 2016-2020 data that 27.2 percent of the labor force in Reedley are employed in agriculture are combined with the EDD wage and poverty data, it suggests that a portion of the labor force employed in agricultural industries is Hispanic (see Table 2-10, Employment by Industry, in the HNA), and it is likely that many of these workers have incomes below the poverty threshold.

The HCD Employee Housing Facilities Permit Services database reports that there are no dedicated farmworker housing units in the city. While there is one H-2A visa housing facility for five residents, it is just outside Reedley (**Table 1L-13**, **Farmworker Housing in Reedley**). With the high proportion of persons engaged in the agricultural industries in Reedley, the lack of farmworker housing facilities suggests that the farmworkers residing in the city may have difficulty finding affordable, appropriately sized housing.

Table 1L- 13 Farmworker Housing in Reedley

Facility Name	Location	Units	Maximum Occupancy								
H-2A Visa Housing Facilities											
Manning House	17352 Manning Avenue	1	5								

Source: HCD Employee Facilities Permit Services Database, January 2023.

Note: Facilities reported in operation as of December 31, 2022.

Given the shortage of farmworker housing units in Reedley, many farmworkers are likely forced to pay market rate for their housing or find other options, such as sleeping in vehicles or garages. Farmworkers that are citizens and permanent residents may have access to the federally or locally assisted affordable multifamily housing opportunities in Reedley, although they must compete with other lower-income households for the limited number of units. There are 369 affordable HUD, USDA, state, or locally assisted affordable housing opportunities in the city, and 43 HCVs were available for rental units. For undocumented workers, options are more limited, and a large portion of farmworkers, even permanent residents, may live in spaces not intended for human habitation, such as shacks, outbuildings and sheds, and converted garages, often in severely overcrowded conditions.

Permanent farmworker households are included in ACS estimates and therefore part of the CHAS housing needs. Consequently, the housing needs of lower-income farmworker households would not be differentiated from other lower-income households experiencing overpayment, overcrowding, and substandard housing (28.4 percent of all households citywide). With 27.2 percent of the labor force in Reedley reported to be employed in agricultural operations, farmworkers may comprise a portion of extremely low- and very low-income households experiencing one or more of these housing problems. Based on the Fresno County Farmworker Survey, 81.7 percent of respondents from throughout the county reported an income below \$2,500 per month, which corresponds to an extremely low-income household of four. Although none of the respondents to the survey were from Reedley, it is likely that farmworkers in Reedley earn similar wages to those countywide and would have similar challenges securing affordable housing.

Based on socioeconomic and demographic characteristics of the farmworker population in Fresno County, it is likely that many farmworkers reside in the older neighborhoods, such as the City Center East neighborhoods where the median income is \$27,217, and the Columbia/East Early Avenue neighborhood with a median income of \$26,563. Further, the Red Beaut Avenue, Duff and Buttonwillow, and Rosewood Estates neighborhoods also have low median incomes, rates of poverty between 34.3 and 40.0 percent, and high proportions of Hispanic households (greater than 90.0 percent of the population), and they are identified by TCAC/HCD as Areas of High Segregation and Poverty.

Citizens, noncitizens with permanent status, and H-2A visa workers are eligible for public housing, HCVs, USDA rural rental assistance, and Section 8 project-based rental assistance. Section 214 of the Housing and Community Development Act of 1980, as amended, makes certain categories of noncitizens eligible for assistance, including most categories of immigrants, but excludes unauthorized immigrants (e.g., undocumented) and those in temporary status (e.g., tourists and students). Section 214 applies to specific programs, primarily federal rental assistance programs administered by HUD and the USDA, including Public Housing, Housing Choice Voucher, Section 8 project-based rental assistance programs, and rural rental assistance.

Undocumented residents are subject to eligibility requirements based on whether Section 214—covered programs are administered by HUD or USDA, which implement different regulatory treatment for mixed-status households depending on householder status. For HUD Section 214 projects, an ineligible noncitizen may reside with family members who are eligible to qualify for affordable housing (such as an undocumented single parent with U.S. citizen children or an undocumented worker married to an eligible householder), although Section 8 benefits are prorated depending on the number of undocumented household members. For USDA Section 214 projects, an undocumented householder would not be eligible to participate in the Housing Choice Voucher program, and therefore would not qualify to live in any of the USDA-assisted affordable multifamily housing complexes (i.e., Riverland Apartments, Springfield Manor and Reedley Senior Apartments). However, a family with an eligible householder that includes undocumented household members (such as a U.S. citizen householder married to an undocumented worker) would qualify to reside in these properties and receive full HCV benefits. This population of assistance-ineligible households is considered underserved and at higher risk of overpayment, overcrowding, and displacement compounded by the legal complexities of eligibility and language barriers.

Similar to most jurisdictions in Fresno County, the majority of the residential opportunities in Reedley are single-family detached and attached units, which comprise 71.3 percent of the housing stock. Multifamily units, including duplex units, comprise 22.4 percent of the housing stock, and 19.5 percent of those are deed restricted or subsidized as affordable units. Reedley has a moderate proportion of mobile homes at 3.0 percent of the housing stock, which are naturally more affordable than single-family residential units and may serve as a valuable housing resource for workers unable to qualify for market rate or affordable rental housing, or other accommodations.

The proportion of renters in these neighborhoods exceeds 60.0 percent of households, suggesting that a portion of single-family units are renter occupied. The high renter rate in single-family neighborhoods may support findings of the Farmworker Survey, where respondents countywide indicated their preference for single-family units regardless of owner or renter status. According to the survey, 95.6 percent of the renters responded that they desired to be homeowners. Further, 78.4 percent of the farmworker renter households consisted of three or more persons, of which 93.6 percent had resided in the U.S. for 10 or more years, 3.7 percent less than 10 years, and 2.7 did not respond. The prevalence of households with three or more persons, coupled with the longevity in the U.S. of the majority of the renters and the preference for single-family-unit type, further substantiate the need for housing to accommodate families. However, the lower

proportion of owner-occupied housing units suggests that the cost of homeownership, with a median home price of \$320,000 (see Table 2-22, Home Sales Recorded in 2021-22, in the HNA) is more than the majority of households in the city can pay, including farmworkers, based on the 2016-2020 ACS employment by industry count and representational incomes reported in the Fresno County Farmworker Survey and EDD. For this reason, farmworkers seeking homeowner opportunities may choose to live in communities where the cost of housing is lower.

The average household size is slightly higher in Reedley (3.6 persons) than in the county and state overall; further 26.8 percent of households in the city have more than five persons. The Farmworker Survey found that the average household size among farmworkers was 3.9 persons, larger than in Reedley. Average household size in the lower income block groups in the city range between 3.8 persons to 5.0 persons. Unlike most cities in Fresno County, homeowner households have a smaller household size (3.5 persons per household) than renters (3.7 persons per household). In Reedley, 33.5 percent of rental units have three or more bedrooms, whereas 89.7 percent of owner-occupied homes have three or more bedrooms, which typically better accommodate larger households without overcrowding. Farmworker survey results indicated that 58.4 percent of the farmworkers in the county were living in overcrowded conditions, with renter households facing greater challenges finding affordable larger options. The rate of overcrowding citywide is 10.9 percent, higher than the county and statewide average. Of the total households in the city, 7.0 percent are overcrowded homeowners and 16.2 percent are overcrowded renters. Over 20.0 percent of households in the eastern and northeastern portions of the city—which have the majority of affordable multifamily rental complexes—are overcrowded, suggesting that farmworker households and other large households, particularly renters, may face challenges finding adequately sized units within their ability to pay in Reedley, resulting in households sharing a dwelling or multiple family members sharing rooms.

In response to the observed need for continued support and housing resources for local farmworkers, the City has included **Programs 8** and **9** offer technical support in applications for funding construction of farmworker housing and include a preference for farmworker households in 15 percent of new units.

Displacement Risk

The Urban Displacement Project, a joint research and action initiative of the 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. Levels of displacement risk range from "probable displacement" to "extreme displacement," with four levels of displacement risk if risk is present. The Urban Displacement Project has not identified any areas of elevated risk in Reedley, though much of the western portion of the city has been identified as a "vulnerable community," corresponding with the areas identified as Area of High Segregation and Poverty (**Figure 1L-20, Vulnerable Community Designation**). Vulnerability is defined as areas in which the share of very low-income residents is above 20 percent and the tract meets at least two of the following criteria:

- Share of renters is above 40 percent.
- Share of people of color is above 50 percent.

- Share of very low-income households that are severely rent burdened households is above the county median.
- They or areas in close proximity have been experiencing displacement pressures.

Displacement pressures are defined as a percentage change in rent greater than the county median for rent increases. While the Urban Displacement Project does not specify the conditions that led to the vulnerability determination for Reedley, it can be assumed that residents in much of western Reedley experience heightened displacement risk compared to residents in the eastern areas and elsewhere in the county due to a combination of incomes and housing prices.

As found in the analysis of overpayment, for-sale home costs have increased by an average of 10.9 percent annually since 2014, and rental costs have increased by an average of 2.4 percent annually since 2015. In contrast, the ACS estimates that, since 2014, the median income in Reedley has decreased by an average of 0.1 percent annually. When comparing change in median income to change in home prices, it is clear that the increase in housing costs far outpaces any changes in wages, indicating increasing displacement risk for residents of Reedley. Given the rapid increase in home values, current and prospective homeowners are likely impacted the greatest by changes in housing cost. In comparison, median incomes countywide have increased by approximately 4.4 percent annually, and rents have increased by 3.2 percent on average. While Zillow does not report countywide home values, the ACS estimates that these have increased by 3.9 percent annually, on average. Therefore, in contrast to conditions in Reedley, there may be a countywide decrease in displacement risk due to home costs. The inflated displacement risk resulting from discrepancies in wages and housing costs in Reedley reflects a disproportionate need for affordable options in the city.

To expand access to affordable options in higher opportunity areas for lower-income households, The City has included **Program 7** to provide incentives for development of affordable housing in higher resource or higher income areas, **Program 12** to encourage construction of ADUs in predominantly single-family neighborhoods, **Program 14** to target development of a variety of housing types in areas of predominantly single-family development and of concentrated overpayment, and **Program 15** to adopt a compliant Density Bonus provision and promote the use of density bonuses for lower-income units, encourage the development of SROs and other special housing arrangements.

-W-Parlier-Ave E-Parlier-Ave J19 -W-North-Ave E-Springfield-Ave--W-Dinuba-Ave-*E*Dinuba*Ave E Floral Ave Reedley City Limits Fresno County Boundary RHNA Sites Affordability Category Above Moderate Income Moderate Income Low Income Mixed Income Sensitive Communities - UCB - Urban Displacement Project Vulnerable

FIGURE 1L-20 VULNERABLE COMMUNITY DESIGNATION

Source: Urban Displacement Project, 2021; City of Reedley, 2023

Other Relevant Factors

In addition to the indicators analyzed above, there are several other factors that can influence housing mobility and access to opportunity in a jurisdiction. For example, historical development patterns may have resulted in neighborhoods that are largely or exclusively made up of single-family homes, or historical discrimination may have influenced a city's racial and ethnic composition. Further, given current market trends, newer market rate neighborhoods may not be financially accessible to lower-income households without overpayment or overcrowding. Other factors may include public and private investment, local regulatory or economic development plans, and historical policies. The factors that are considered relevant vary between jurisdictions and are described at the local level following.

Land Use and Zoning Patterns

According to the 2016-2020 ACS, 71.3 percent of Reedley's housing stock consists of single-family units, inclusive of single family attached units, a proportion comparable to other Fresno County jurisdictions. Duplex, triplex, and fourplex unit types make up approximately 12.2 percent of Reedley's housing units. Approximately 6.9 percent of the housing stock consists of multifamily units in structures of five to nine units, and 6.6 percent in structures with 10 or more units. Mobile homes, a housing type that is often more affordable, comprise 3.0 percent of the housing stock, a slightly smaller proportion than in other Fresno County jurisdictions, with the majority of the units in the Kings River Mobile Home Park. Approximately 41.9 percent of households in Reedley are renters, indicating that a significant portion of the housing stock is available as rental property, regardless of unit type.

While in most communities single-family zoning can create desirable places to live, higher entry costs associated with this housing type can pose a barrier to access for lower- and even moderate-income households, restricting access to economic, educational, and other opportunities that may be available in single-family neighborhoods. In October 2022, the price of available single-family units for purchase listed on Zillow.com generally exceeded the price threshold of lower-income households, even the single-family residential areas in the vicinity of the downtown east of the rail line, where the concentration of households with the lowest median income are found. Additionally, the single-family residential areas in the northeastern corner of the city have been designated by TCAC and HCD as an area of High Segregation and Poverty and, therefore, may not necessarily offer more positive access to educational, services, employment, and businesses resources than areas with multifamily units. Additionally, the central downtown and older residential neighborhoods on the east side of the San Joaquin Valley Railroad, including residential uses adjacent to a concentration of industrial uses, have been identified as an Area of High Segregation and Poverty.

Affordable housing development in the current market typically requires high density zones to support construction; therefore, zones limited to a single dwelling unit on each lot generally do not support affordable development. As shown in **Figure 1L-14**, **Zoning in Reedley**, there are two zones for higher density multifamily housing. The RM-2 district is a high density zone that accommodates attached homes, duplexes to fourplexes, apartment buildings, and condominiums, and the RM-3 district is intended primarily

for medium density residential uses, such as small-lot single-family homes, detached zero lot line developments, duplexes, triplexes and fourplexes, townhouses, condominiums, and garden apartments as well as older, primarily single-family residential areas of the community where vacant property has been bypassed because of excessive size, irregular shape, or difficulty in providing public access.

The high-density RM-2 and RM-3 multifamily zones in Reedley are spread throughout the city, with a higher incidence in the North Haney, Red Beaut Avenue, and East Early Avenue neighborhoods east and northeast of the core downtown area, where four of the affordable multifamily complexes are. In the northwest area near Reedley College, a large parcel with three multifamily complexes is zoned RM-2 adjacent to a hospital zoned as Professional Office (PO). Additionally, a number of parcels are zoned for RM-2, many still vacant, adjacent to the Community Commercial (CC) zoned properties along Manning Avenue at one of the main entries to the city. Residential uses permitted in any RM district are also permitted in mixed-use products within the CN, CC or CS district, or as part of a Specific Plan project. Integration of higher density residential within the CN, CC or CS zones would provide increased access to services, businesses, and employment opportunities as well as intercity transit in key locations within the downtown core, along Manning Avenue at the entries to the city, and along Dinuba Avenue. Further, higher density residential serves as a transition between commercial uses and adjacent residential, fostering more mixed-income integration opportunities. Within the newer neighborhoods at the southwestern corner of the city, a large parcel has been zoned for high density residential, with several multifamily complexes, which offers an opportunity for income integration and access to resources within this high resource designated tract.

The location of RM-2 and RM-3 parcels on the zoning map suggest some opportunities for income-integrated neighborhoods, as they are located adjacent to commercial and office/professional uses and have been strategically located near parks and recreation uses and school sites, thus providing accessibility to resources and services. However, much of the R-3 zoning falls within older neighborhoods in and adjacent to the downtown core that have been identified as an Area of High Segregation and Poverty. The Reedley Family Apartments have been sited on a parcel adjacent to the rail line, across the tracks from heavy industrial uses and vacant land on the west at the southern edge of the city, which concentrates lower-income households near less environmentally healthy uses. While there are opportunities for infill and potential reuse of a portion of properties in the older sections of the city at higher densities to accommodate lower-income households, mixed-income development would help reduce the socioeconomic factors contributing to the designation of High Segregation and Poverty in these neighborhoods.

When compared to **Figure 1L-2, Local TCAC/HCD Opportunity Areas,** the distribution of high density zones is consistent with a countywide pattern of multifamily housing, particularly affordable complexes, primarily in lower-resource areas. In the case of Reedley, there are higher concentrations of planned affordable multifamily properties within the Area of High Segregation and Poverty and a large proportion of high-density zoned properties in the areas of High Segregation and Poverty. Additionally, although there are many smaller multifamily units within the R-3 zones, primarily duplex through fourplex unit types, that are integrated throughout the older neighborhoods within and surrounding the central core area in the Area

of High Segregation and Poverty, they may not offer affordable housing options. This suggests that, in the current housing market, market rate rental properties in these lower resource areas may exceed lower-income households' ability to pay, resulting in the high proportions of overpayment among lower-income renters. However, this pattern is not consistently applicable to zoning in the northwest and southwest portions of the city, as discussed above.

Historical Development Patterns

Thomas Law Reed settled in the present site of Reedley to take advantage of the demand for wheat in response to the Gold Rush in the mid-1800s. Like many other jurisdictions in the San Joaquin Valley, the extension of branch lines of the Southern Pacific Railroad in 1888 was the impetus for the foundation of the original Reedley settlement at a rail station distribution site. Reed deeded a half-interest in a 360-acre town site to the Pacific Improvement Company, a Southern Pacific subsidiary, and in return they established a rail depot at 11th Street. Railroad officials commemorated his donation by naming the settlement in his honor.

The original town site, based on the 1892 Thomas Guide, consisted of six blocks on the east side of the Southern Pacific Railroad line and five block on the west. The foundation of the community was laid out in a diagonal pattern, 11 blocks in length, similar to many other jurisdictions in Fresno County that originated as rail stops. The initial town site area is bounded by North Avenue to the north and South Avenue (now East Dinuba Avenue) to the south, East Avenue to the east, and West Avenue (now Reed Avenue) to the west. The city boundaries extended two property blocks along the north perimeter surrounding the city core to what is now Manning Avenue, and the same to the east, laid out in a traditional grid pattern. The commercial center of the city was established on the east side of the rail line along G and 11th Streets, with six churches interspersed with residential uses and a school just outside the core area. Scattered commercial uses were found on the west side adjacent to the rail line, as were churches and two schools. The original township area east of the railroad line currently coincides with portions of a High Segregation and Poverty TCAC/HCD designation, reflecting the availability of less costly older housing stock in these sections of the city. Reed built and owned the town's first hotel, livery stable, and blacksmith shop. He established the first warehouse using a 500-foot-long building hauled in from Traver. He donated land and helped establish the area's first school (Washington School) and church. Reed was a founding director of the Alta Irrigation District (which assumed control of the canal system of the 76 Company) and was among the first to lobby for building a dam on the Kings River.

When the mining fever began to fade, wheat demand slackened. Kings River water was diverted for crop irrigation, and the region began its over-100-year tradition of field crops and tree and vine fruit farming. With water and railroad services in place, farming families of European immigrants were recruited. An important element in the early town was a colony of German Mennonites, whose strong traditions and values still shape Reedley's culture. The building that houses the Opera House was built in 1903 after a fire destroyed two blocks of downtown Reedley. Danish grain merchant, Jesse Jansen, rallied the downtown shopkeepers to rebuild Reedley's downtown out of brick. The Opera House itself was built at Jansen's

personal expense to serve as a cultural and community center. In 1913, the population of Reedley met at the Opera House to vote for incorporation. The city embraced improvements such as the development of cement sidewalks and sewer systems. In the same year, the first steel water tower was built. After the early 1920s, movies replaced live theatre as a major form of entertainment, and the building went into disuse until restoration in 1986. The building was donated to the City of Reedley in 2002.

Reedley College has played an instrumental role in the growth of the city. The school was established in 1926 as Reedley Junior College, sharing the Reedley High School campus just north of the central core. In 1936, a separate building on the Reedley High School campus was built to house the junior college administration and additional classrooms. By the late 1940s the governing board decided the time was right for the college to develop a separate campus and a separate identity. The board began negotiation to purchase the current campus site at Reed and Manning Avenues, once part of the historic Thomas Law Reed Ranch, and in September 1956, the college moved to its present site, now encompassing 420 acres, including the school's 300-acre farm adjacent to the main campus.

By the opening of the new college campus, the city's acreage had expanded to include most properties north of Manning Avenue up to Cypress Avenue and as far east as Buttonwillow Avenue; east of the central core along Springfield Avenue as far east as Buttonwillow Avenue, including the Jefferson School; as far west as South Hope Avenue; and as far south as West Shoemake Avenue.

Since 1946, Reedley has been known as the Fruit Basket of the World, leading the nation in the shipping of fresh fruit. Thirty fruit and vegetable packing and cold storage facilities, including the world's largest plant, and nearby wineries supply tree and vine fruit products. Because the city does not have a regional auto circulation route bisecting its original town center to draw commercial revenue away from the downtown, the historical Reedley commercial center has maintained its role, offering various specialty shops, dining, and entertainment, and larger scale regional commercial uses have been established along the gateways to the city at Manning Avenue. However, although community commercial zoning permits mixed use with residential and the RM-3 zone offers opportunities for infill and medium density multifamily uses, these tools can be further maximized to provide mixed-income or new market rate residential to foster reduction of concentrations of populations of color, low-income households and persons experiencing poverty, which in turn would further promote place-based revitalization of the downtown area.

Public Investment Patterns

Public and private investment typically includes construction, maintenance, and improvements to public facilities, including infrastructure, acquisition of land, and major equipment. Historically, investment in the City of Reedley has been prioritized based on need and available funding, which has prevented disinvestment in any particular area of the city. The City's Engineering Department utilizes the National Pavement Condition Index standards to evaluate the condition of arterial, collector, and residential streets. Continued enhancement of pavement conditions provides a safer environment for traffic, bicyclist, and pedestrian movements.

Infrastructure or facilities in need of improvement are identified for investment in the City's 5-Year and annual Capital Improvement Plan (CIP). The CIP is funded from a variety of sources that can each be used for specific purposes. The criteria used to qualify a project for the CIP include:

- Elimination of potentially hazardous or unsafe conditions and potential liabilities.
- Replacement of high-maintenance and inefficient/ineffective infrastructure.
- Improvement to and/or creation of new public services.
- Outside agency regulatory requirements and mandates.
- Stimulation of the local economy/eliminate blighted conditions.
- Compliance with the City's General Plan.
- Preservation of existing assets.

These funds are allocated to improve roadways and other transportation infrastructure, redevelopment projects, and install infrastructure support for new construction, as well as other projects, including:

- Rail to Trail Repairs. The City improved pedestrian and bicycle networks throughout the city
 to improve accessibility and navigability and promote access to healthy outdoor spaces through
 bicycle trails.
- Safety Improvements. Relocated, removed, replaced, and/or installed approximately 433 street signs to improve accessibility through wayfinding, and repaired sidewalks on Manning Avenue and Downtown and Manning Avenue to improve pedestrian safety and connectivity.
- Safe Routes to Schools. The City continued to fund and work with the Jefferson Elementary
 to implement programs to promote Safe Routes to School in an effort to improve access to
 school and safety for children and parents.
- Water and Wastewater Improvements. To support future development and service capacity, the City allocated funding for upgrades to the Olson Avenue Wastewater Main and construction of off-site treatment facilities and TCP (chemical contaminant) removal treatments for water wells and rehabilitated the Wastewater Treatment Plan Influent Pump Station.
- Downtown Vibrancy Project. The City funds and implements improvements to Downtown, including adding or improving street lighting, upgrading wayfinding and navigation, and other improvements to support a strong economic core and facilitate place-based revitalization.
- Park and Recreation Improvements. The City rehabilitated or constructed new facilities at several parks throughout the city, including the Sports Complex and the band shell at Pioneer Park to promote access to safe and healthy outdoor spaces for residents and visitors.

Priority is based on projects that will result in the greatest community benefit, mitigate existing issues, and address public demand and need, focusing on creating more public facilities, public safety, and recreational amenities for residents of the city; expanding the capacity of the water, sewer, and roadway infrastructure network; and preparing for expansion of the city's development of industrial, commercial, and residential uses. There has not been any disproportionate investment or disinvestment in any particular area of the city. The annual CIP provides funding for new facilities to handle expanding growth and targets the central older

core of the city with roadway improvements, parks improvements and general maintenance, and infrastructure rehabilitation throughout the city.

Local Knowledge

The City, in concert with Reedley Downtown businesses, has undertaken the task of revitalizing Downtown through improving urban design and expanding amenities. The Reedley Downtown Parking and Street Improvement Area ("Downtown Streetscape District") was formed in 1986 by Downtown business leaders to provide improvements to and maintain the city's streetscape in the Downtown area, generally along 9th Street between the G to F Street alley and the G to I Street alley. Investment in the Downtown area will help attract new businesses, promote planned integration of residential uses into the Downtown commercial fabric, and facilitate place-based revitalization, while increasing access to centrally located commercial, service, and office resources.

In 2001, the City of Reedley adopted the Reedley Specific Plan to guide future development along the edges of the existing Reedley Planning Area in the sphere of influence. The prezoned acreage still remains primarily within the sphere of influence, and the acreage at the southern edge of the city that has been annexed into the city with high density residential unit potential remains undeveloped, The stated goals are toward achieving the highest quality development that addresses issues such as protecting farmland by increasing residential densities to maximize development potential, where applicable; improving air quality; building a strong sense of community; using energy efficient design; and encouraging development that accommodates alternative transportation modes such as walking and bicycling. There are several housing strategies to foster housing mobility and income-integration opportunities, increase access to resources, and facilitate reduction of concentrations of socioeconomic characteristics associated with the High Segregation and Poverty designation in the southeast portion of the city. These strategies include the Reedley Specific Plan, which identifies the potential for future infill and higher density residential uses in mixed-income contexts; infill, redevelopment, and optimization of permitted zoning densities in the RM-2 zone, which still includes vacant parcels; and mixed-use residential in community commercial zones in the city core and at main entryways to the city. The Reedley Specific Plan contained goals and policies for residential and commercial growth which were evaluated and incorporated into the General Plan 2030 Update.

In 1986, the Southeast Industrial Area Specific Plan was adopted by the City Council to address land use, circulation, and public facilities for an approximately 640-acre area in the southeast portion of Reedley. The General Plan 2030 Update reflects the goals and policies that focus on maintaining adequate acreage for industrial development and emphasis on the importance of industrial land as an economic tool for Reedley. While residential uses are not proposed in this Specific Plan, annexation and development of this area in the future would provide increased access for residents to employment opportunities. The General Plan 2030 Update reflects the goals and policies in the Southeast Industrial Area Specific Plan that focus on maintaining adequate acreage for industrial development and emphasis on the importance of industrial land as an economic tool for Reedley.

In October 2002, the City Council adopted the Rail Corridor Master Plan to guide development in the area around the Reedley Parkway (Rail Trail) from Manning Avenue at the Kings River to Dinuba Avenue to the south. The Rail Trail has been completed in the Downtown area, fostering improved access to recreation amenities for existing and future residents in the neighborhoods within and surrounding the Downtown. Primarily, the master plan provides the framework to encourage development of parcels that complement the parkway and will transition to higher value uses and away from underutilized industrial parcels. The goals and policies from the Rail Corridor Master Plan were incorporated into the General Plan 2030 Update.

The City of Reedley continues to process applications for residential subdivisions and projects throughout the city, annexing parcels at the periphery of the city on Manning Avenue that have potential for affordable housing development in commercial mixed-use and high density residential zoning, completing Downtown improvements fostering mixed-income residential projects, and promoting opportunities for affordable housing throughout the city.

Enforcement and Outreach Capacity

Compliance with Fair Housing Laws

In addition to assessing demographic characteristics as indicators of fair housing, jurisdictions must identify how they currently comply with fair housing laws or identify programs to become in compliance. The City of Reedley enforces fair housing and complies with fair housing laws and regulations through a twofold process: review of local policies and codes for compliance with state law, and referral of fair housing complaints to appropriate agencies. The following identify how the City complies with fair housing laws:

- Density Bonus Law (Government Code Section 65915). The City has included Program 15 to amend the density bonus ordinance to allow up to a 50.0 percent increase in project density depending on the proportion of units that are dedicated as affordable, and up to 80.0 percent for projects that are completely affordable, in compliance with state law.
- No-Net-Loss (Government Code Section 65863). The City has identified a surplus of sites available to meet the Regional Housing Needs Assessment allocation. In total, the City's surplus unit capacity is 408, composed of 19 lower-income units, 88 moderate-income units, and 301 above moderate-income units.
- Housing Accountability Act (Government Code Section 65589.5). The City does not condition the approval of housing development projects for very low-, low-, or moderate-income households or emergency shelters unless specified written findings are made. Further, the City currently allows emergency shelters by right, without limitations, in the CN, CC, CS, and ML zoning districts.
- Senate Bill 35 (Government Code Section 65913.4). The City will comply with SB 35 by establishing a written policy or procedure, as well as other guidance as appropriate, to streamline the approval process and standards for eligible projects by September 2024 (Program 18).

- Senate Bill 330 (Government Code Section 65589.5). The City complies with SB 330, relying on regulations 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 City adopted a compliant SB 330 application that is available on the City's website.
- California Fair Employment and Housing Act and Federal Fair Housing Act. The City provides protections to residents through referrals to legal assistance organizations, such as California Rural Legal Assistance, and has included Program 26, Housing Discrimination Monitoring and Referral.
- Review Processes (Government Code Section 65008). The City reviews affordable development projects in the same manner as market-rate developments, except in cases where affordable housing projects are eligible for preferential treatment, including but not limited to residential sites subject to AB 1397.
- Assembly Bill 686 (Government Code Section 8899.50). The City has completed this
 Assessment of Fair Housing and identified programs to address identified fair housing issues
 in Table 1L-15, Factors Contributing to Fair Housing Issues.
- Equal Access (Government Code Section 11135 et seq.). The City provides translation services for all public meetings and materials and offers accessibility accommodations to ensure equal access to all programs and activities operated, administered, or funded with financial assistance from the state, regardless of membership or perceived membership in a protected class.

Fair Housing Outreach

Regional outreach efforts for the Multi-Jurisdictional Housing Element included interviewing Fair Housing of Central California (FHCC) for feedback on housing need, fair housing concerns, and opportunities to affirmatively further fair housing throughout the county. FHCC is a non-profit, civil rights organization dedicated to the elimination of discrimination in housing and the expansion of housing opportunities for all persons. They accomplish this through advocacy, assistance for victims of discrimination, and enforcement of fair housing laws.

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. 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.

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.

In response to the feedback received, the City has included **Program 26** to improve fair housing outreach capacity and multilingual accessibility to all public resources, information, and meetings, including fair housing resources. This program also includes steps to establish a procedure to connect residents with fair housing organizations, make information readily available and accessible on the City's website and in public buildings, and conduct biannual trainings for landlords on fair housing laws, rights, and responsibilities.

Discrimination Cases

In its 2020 Annual Report, the California Civil Rights Department (previously Department of Fair Employment and Housing) reported that it received nine housing complaints from residents of Fresno County, approximately 1.0 percent of the total number of housing cases in the state that year (880). As part of the Fair Housing Assistance Program (FHAP), the Civil Rights Department also dual-files fair housing cases with HUD's Region IX Office of Fair Housing and Equal Opportunity (FHEO), reporting them by the origin of the issue.

HUD FHEO reported that there were no cases filed by residents of the City of Reedley between January 2013 and April 2021. However, two inquiries were made, one against a public entity (e.g. the Fresno County Housing Authority or City of Reedley). This inquiry was determined to have no valid basis, and the other was not pursued further as the claimant failed to respond to HUD. While there were no cases in Reedley, this does not necessarily mean that there is no discrimination. In some cases, residents may be hesitant to report discrimination, such as in the case of undocumented residents that fear retaliation or may not be aware of fair housing legal assistance available to them.

To address fair housing discrimination issues in the city, **Program 26** includes language to coordinate with the Housing Authority, Fresno Council of Governments (FCOG), and other Fresno County jurisdictions to develop Spanish-language printed materials to improve accessibility to fair housing resources for residents, provide fair housing information on the City's website and in printed materials available in public buildings in both English and Spanish, and establish a procedure to refer residents with fair housing questions or issues to the Fair Housing Council of Central Valley (FHC-CC), California Rural Legal Aid (CLRA), and other fair housing organizations.

Sites/Fair Housing Analysis

The location of housing in relation to resources and opportunities is integral to addressing disparities in housing needs and opportunity and to fostering inclusive communities where all residents have access to opportunity. This is particularly important for lower-income households. AB 686 added a new requirement for housing elements to analyze the location of lower-income sites in relation to areas of high opportunity.

Table 1L-14, RHNA Capacity by Census Tracts in Reedley presents the RHNA capacity by census tracts in the city, and the existing conditions of each tract as they relate to indicators of fair housing. Figure 1L-21, Census Tracts in Reedley, shows the location of each census tract within the city. Tract 63 includes land within the city as well as land within adjacent unincorporated county to the north and east. As shown, sites with units at varying income levels have been identified in four of the census tracts within Reedley, with one tract (66.03) identifying only lower-income unit capacity. Tract 66.05 does not include any unit capacity and therefore is not included in Table 1L-14. Tract 67 is large and encompasses several neighborhoods, including the Riverbottom neighborhood, which is adjacent to the Kings River on the western edge of the city. This neighborhood has the lowest proportion of non-White persons, 50.7 percent, and this block group also has the highest median income in the city and a highest-resource designation.

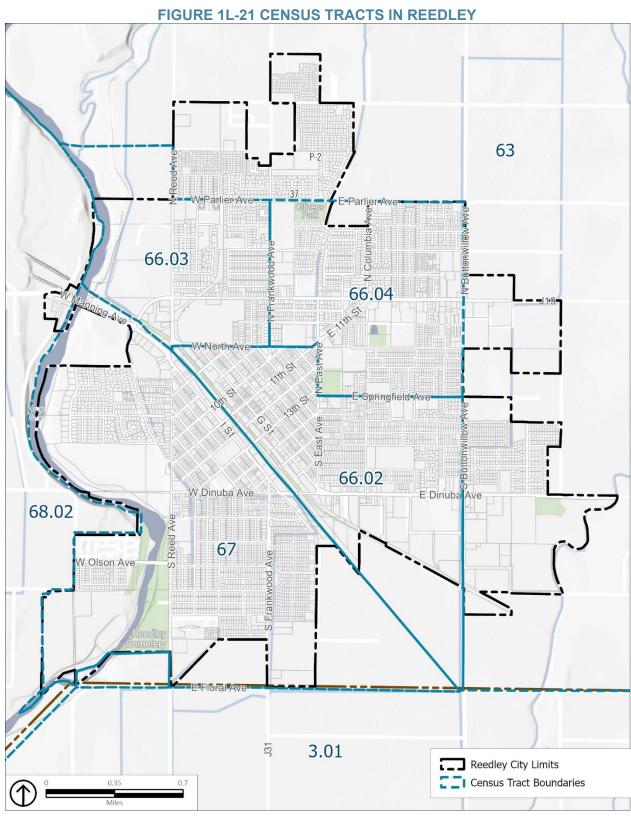
As identified in the analysis of Patterns of Integration and Segregation, according to the 2022 COG Geography TCAC analysis there is one tract (66.02) in central/southeast Reedley that meets the criteria of being considered an Area of High Segregation and Poverty. This concentration of poverty and non-White population includes land within the downtown area east of the San Joaquin Valley Railroad, as well as southeast of downtown in the older portions of the city; compounded by a 20.9 percent overcrowding rate, a high CalEnviroScreen score in the 94th percentile, ranking the tract as a disadvantaged community, and high renter rates, of which 63.2 percent of renters are cost burdened. To address the displacement risk for lower-income households, 1.1 percent of the RHNA unit capacity is identified in this tract, including 0.2 percent of lower-income unit capacity, 2.4 percent of moderate-income unit capacity, and 1.3 percent of above moderate-income unit capacity to foster income-integration and mixed-income neighborhoods.

Table 1L- 14 RHNA Capacity by Census Tracts in Reedley

Census Tract	Existing Households	RHNA Capacity			AFFH Indicators											
		Low	Mod.	Above Mod.	Integration & Segregation				Access to Opportunity			Displacement Risk				
					Median Income	Poverty Rate	Low- to Mod- Income Population	Non-White Population	R/ECAP Status	Resource Designation (2021)	Jobs Proximity Index	CalEnviroScreen Percentile	Overcrowding Rate	Renter Overpayment Rate	Homeowner Overpayment Rate	Percent Renter Households
63	2,112	150	130	472	\$78,295	6.5%	25.5%	55.3%	15.2%	Highest	7 - 36	63.6	10.1%	35.2%	33.4%	18.6%
66.02	1,428	1	6	11	\$41,806	30.3%	58.8%	92.1%	12.1%	Moderate - High	19 - 36	94.5	20.9%	63.2%	31.6%	59.8%
66.03	589	3	0	0	\$44,375	18.3%	29.1%	71.3%	6.8%	High	35	71.7	8.3%	56.5%	36.7%	49.4%
66.04	1,816	343	8	12	\$44,444	28.4%	55.6%	93.8%	7.8%	High Segregation & Poverty	17 - 29	91.4	21.9%	67.1%	32.3%	46.8%
67	1,895	100	102	325	\$45,195	14.4%	41.9%	77.5%	12.9%	High - Highest	21 - 42	79.4	14.1%	59.7%	30.6%	26.6%

Sources: 2015-2019 ACS; Esri, 2018; TCAC/HCD 2021; HUD, 2020; OEHHA, 2021; CHHS, 2022

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Source: U.S. Census Bureau, 2010

Tract 66.04 was designated by TCAC/HCD as an Area of High Segregation and Poverty in its 2021 analysis, but not in 2022. In this tract, approximately 55.6 percent of the population are lower- and moderate-income households and the median income is \$44,444. Paired with a predominantly non-White population (93.8 percent of the population), the highest rate of overcrowding in the city (21.9 percent), low proximity to jobs, high renter overpayment rates, and a high CalEnviroScreen score (91.4), this tract shows characteristics of vulnerability to displacement and disproportionate housing need. The City has identified a total of 21.8 percent of the RHNA capacity in this tract. To reduce displacement risk for these households, the City proposes the integration of 57.4 percent of lower-income unit capacity to facilitate housing mobility, as well as 3.3 percent of moderate-income and 1.5 percent of above moderate-income unit capacity to facilitate mixed-income and more integrated, diverse neighborhoods, combat patterns of concentrated poverty, and foster improved access to resources and opportunities for lower-income households.

The tract with the highest percentage of RHNA unit capacity (45.2 percent) is tract 63, which includes the area north of Parlier Avenue and east of North Buttonwillow Avenue. In this tract, the City has identified capacity for 25.1 percent of lower-income unit capacity, 52.6 percent of moderate-income capacity, and 57.5 percent of above moderate-income capacity. This tract has the highest median income and lowest poverty rate in the city, suggesting income integration within the tract for lower-income households to live in these newer, primarily single-family homeowner, high resource neighborhoods with relatively low rates of overpayment (below 35.2 percent for both tenures). These sites will include multifamily and single-family residential development, as well as access to a variety of amenities including parks, trails, open space, and commercial resources. The inclusion of lower-income unit capacity will foster improved housing mobility and access to opportunities for lower-income residents; and additional housing stock to provide mobility options for existing and future moderate and higher-income households in a high resource designated area.

Tract 67 also identifies a significant portion of the RHNA unit capacity (31.6 percent) west of the San Joaquin Railroad, where newer residential subdivisions are being built. This tract is projected to accommodate 16.7 percent of lower-income capacity, including a mixed-income pipeline project on Manning Avenue and large vacant site at the southern edge of the city; 39.6 percent of above moderate-income unit capacity, and 41.4 percent of moderate-income unit capacity.

The City has included **Programs 7** and **12** to support construction of higher-density housing in areas with better access to opportunities and encourage integration of a variety of unit types to facilitate mixed-income neighborhoods, combat patterns of income segregation, and provide housing mobility opportunities for a range of households. The distribution of sites identified in **Table 1L-14** is based on the availability of sites and potential for development during the planning period, including five pipeline projects.

Figures 1L-21 through **1L-28** compare the distribution of projected units by income category of the following indicators compared to citywide patterns to understand how the projected locations of units will affirmatively further fair housing: TCAC opportunity areas, median income, predominant population, disability rates, educational score, environmental health, and overpayment. The following sites inventory discussion includes an analysis of the number of projected units by income category, total RHNA capacity, and city acreage by income category to further assess the potential impacts of the sites inventory to affirmatively further fair housing.

Potential Effect on Patterns of Integration and Segregation

TCAC Resource Category

Figure 1L-22, Percentage of Unit Capacity by TCAC Resource Category (2021), presents the breakdown of unit capacity in Reedley by resource opportunity designation compared to citywide patterns. Approximately 4.0 percent of the total unit capacity identified to meet the RHNA is in high resource areas, with 73.0 percent in the highest resource designation, and 21.8 percent in an area of High Segregation and Poverty. There is only one site with capacity for one moderate-income in the moderate resource area, and as there are no low resource areas designated in the city, the low resource designation is not reflected on Figure 1L-22.

The high resource areas in Reedley are in the northern, eastern, and southern sections of the city. However, while the eastern portion of the high resource designation is also identified by TCAC/HCD as an Area of High Segregation and Poverty, it is likely based on income and racial and ethnic characteristics of the population only and may not account for proximity to commercial, employment, services, environmental conditions, potential educational outcome, and amenities which are integrated into the determination of a TCAC/HCD resource designation. Additionally, it should be noted that the TCAC/HCD resource categories are developed based on comparison of indicators between jurisdictions within the Central Valley region, many of which are lower income communities with high rates of poverty. Therefore, while tracts may be determined as high resource, it should be considered in the context of comparison to opportunities and potential outcomes within other cities within the Fresno County region.

In the high resource areas, opportunity for 7.7 percent of lower-income unit capacity has been identified on vacant parcels, therefore not risking displacement of existing residents. Site 5 is adjacent to the downtown core, and site 3 is in the vicinity of the western Manning Avenue entrance to the city; both are located with access to commercial, office, services and transit amenities. Three of the sites (10, 11, and 12) are identified for mixed-income moderate/low-income developments which fosters income-integration, reducing potential for further concentration of poverty and segregation of populations of color in the Area of High Segregation and Poverty, and provide housing mobility opportunities in higher resource neighborhoods. Moderate-income unit capacity, 5.3 percent, is also identified in the high resource designation. Only a very small amount (0.9 percent) of above moderate-income unit capacity is identified on high resource designated sites.

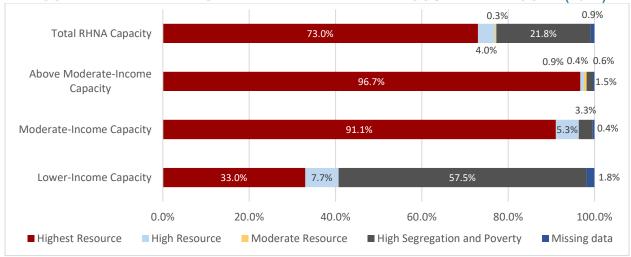


FIGURE 1L-22 PERCENT UNIT CAPACITY BY TCAC RESOURCE CATEGORY (2021)

Source: California Tax Credit Allocation Committee, 2021; City of Reedley, 2023

The highest resource designated areas consist of the central northern portion of the city neighborhoods east of Buttonwillow Avenue, and west of Reed Avenue, with a portion extending to S. Frankwood Avenue south of West Huntsmen Avenue. Approximately 33.0 percent of the lower-income RHNA capacity is identified in areas with this designation. As well, site #20 at Reed Avenue and Floral Avenue the southwestern portion of the city and sites #1 and Reedley I pipeline project (P-4) west of Buttonwillow Avenue include 20.9 percent of the lower-income RHNA unit capacity. The majority (96.7 percent) of above moderate-income RHNA capacity is identified in the highest resource designation, with the largest concentration of above moderate-income potential west of Reed Avenue and north of West Dinuba Avenue adjacent to the Kings River. Inclusion of 28.8 percent of the total above moderate-income RHNA capacity, including in mixed-income projects, north of West Parlier and east of Buttonwillow Avenue helps to facilitate mixed-income neighborhoods and encourages future integration of moderate and lower-income housing mobility opportunities in highest resource areas.

Sites within the Area of High Segregation and Poverty account for 21.8 percent of the total RHNA, including 57.5 percent of lower-income unit capacity, 3.3 percent of moderate-income unit capacity, and 1.5 percent of above moderate-income unit capacity. The moderate- and above moderate-income sites help to facilitate mixed-income neighborhoods and encourage future integration in areas that are currently designated as pockets of poverty and high rates of non-White populations, while the lower-income units counter potential displacement of existing residents by increasing the stock of affordable housing opportunities.

Income

As previously discussed, Reedley is a community with a range of household income levels distributed between higher- and lower-income sections of the city, although household income falls below the statewide median in all census tracts except tract 67, regardless of TCAC/HCD resource designations. These relatively lower-income neighborhoods feature older, small-lot residential housing with some multifamily properties, including affordable housing complexes.

As shown in **Figure 1L-23**, **Percentage of Unit Capacity by Median Income**, a larger percentage of the unit capacity (54.8 percent) has been identified on sites within the lower-income category. Capacity for 74.9 percent of lower-income units is identified on sites at or below the 2022 Fresno County median income, which expands the more affordable housing stock resources and provides mobility opportunities for residents who want to move yet remain within their existing neighborhoods, thereby preventing displacement. Additionally, it facilitates de-concentration of lower-income households from the central portions of the city with a median income at the poverty threshold to higher income portions of the city with potential to mature into a higher resource-designated area. The inclusion of 47.2 percent of the moderate-income unit potential in scattered vacant sites and 42.4 percent of above moderate-income units will help to facilitate mixed-income neighborhoods and encourage future income integration in areas that are currently designated as Areas of High Segregation and Poverty, and those with a predominance of lower-income households, and also has the potential to raise the income and revitalize lower-income existing neighborhoods.

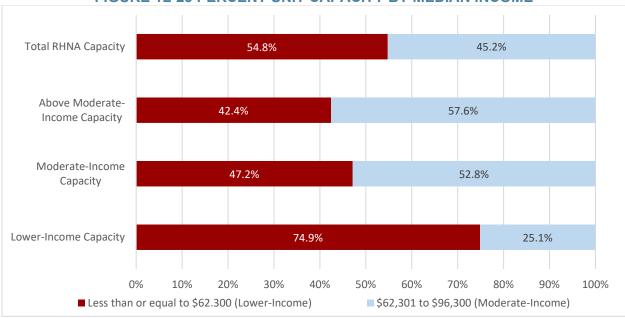


FIGURE 1L-23 PERCENT UNIT CAPACITY BY MEDIAN INCOME

Source: 2015-2019 ACS; City of Reedley, 2023

Conversely, 42.4 percent of the RHNA capacity is found in tracts north of West Parlier Avenue, west of Reed Avenue, and east of Buttonwillow Avenue which have median incomes predominantly in the moderate- and above moderate-income range. This includes identification of sites for 52.8 percent of moderate-income unit capacity, and 54.8 percent of above moderate-income unit capacity, fostering additional housing mobility opportunities in high resource areas. Future construction potential of 25.1 percent of lower-income RHNA units in higher-income neighborhoods not only integrates income mix in higher-income neighborhoods and facilitate housing mobility for lower-income households with increased access to resources, but it also aims to reduce existing income patterns and pressure on housing shortages in areas of concentrated need.

As presented in Figure 1L-24, Percentage Unit Capacity by Poverty Rate, approximately 45.2 percent of RHNA unit capacity is identified north of Parlier Avenue with poverty rates below 10.0 percent and 31.9 percent of the RHNA capacity is identified in the northwest Reedley College tract and east of Buttonwillow Avenue with poverty rates of 14.4 and 18.3 percent, respectively. Further, 21.8 percent of the RHNA capacity is identified in the North Haney, Red Beaut Avenue, and East Early Avenue neighborhoods east and northeast of the core downtown area with a poverty rate of 28.4 percent, and the remainder of the unit capacity is identified in corresponding to the Area of High Segregation and Poverty designation where 30.3 percent of the population has an income below the poverty threshold. Approximately one-fourth of lowerincome unit capacity (25.1 percent) is identified on sites in the northern and eastern tracts to encourage the development of housing mobility opportunities for lower-income households in more stable neighborhoods while reducing the concentration of households in poverty in the Area of High Segregation. The remainder of the lower-income site capacity is projected in areas with an existing need for an increased supply of affordable housing for lower-income and overcrowded households to remain in their neighborhoods and reduce risk of displacement. Construction of these lower-income units in these areas will help to alleviate existing patterns of overpayment and overcrowding and encourage place-based revitalization through development of vacant, often unsightly parcels, providing new, safe housing in areas of more concentrated poverty.

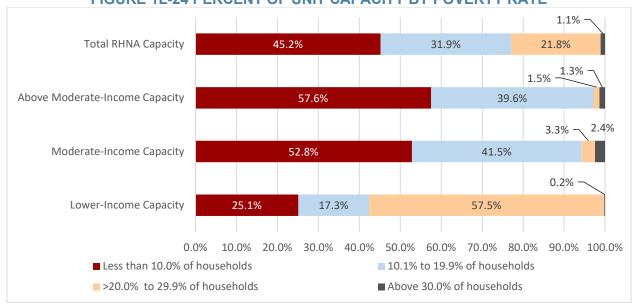


FIGURE 1L-24 PERCENT OF UNIT CAPACITY BY POVERTY RATE

Source: 2015-2019 ACS and City of Reedley, 2023

In addition to these lower-income units, 5.8 percent of moderate-income units and 2.8 percent of above moderate-income units are projected in high-poverty neighborhoods (those with rates of poverty greater than 20 percent) to affirmatively further fair housing through mixed-income neighborhoods and deconcentration of extremely low-income households in tracts on the eastern side of the city and Area of High Segregation and Poverty. In addition, the City has included **Program 12** to actively promote construction of ADUs in moderate-resource and high median income areas and monitor affordability of new ADUs to lower- and moderate-income households.

The combination of this program and facilitating the development of high-density housing, in a community that has historically been dominated by single-family units, will help ameliorate patterns of segregation. The development of these sites with a mix of housing units will make Reedley more accessible to households with a wider range of incomes, while simultaneously increasing housing mobility opportunities and de-concentrating areas of poverty and low-income households.

Race and Ethnicity

As discussed previously, Reedley is among Fresno County's moderately diverse jurisdictions, with communities of color comprising 79.1 percent of the population. As shown in **Figure 1L-7 Racial Demographics**, there is a pattern of lower concentration of non-White households at the city's northern, western and eastern edges, coinciding with areas of relatively higher income and resources, and more racially segregated areas closer to the city's center and older neighborhoods, generally coinciding with the Area of High Segregation and Poverty, lower-income, and Area of High Segregation and Poverty.

As shown in Figure 1L-25, Percentage of Unit Capacity by Percent Non-White Population, 22.9 percent of the capacity to meet the RHNA is located in areas where the more than 80.0 percent of the population identifies as non-White. Of the lower-income unit capacity, 25.1 percent is identified on sites in areas in which 40.0 to 59.9 percent of the population identifies as non-White, with 17.3 percent of lower-income units in areas in which 60.0 to 79.9 percent of the population identifies as non-White. This offers an opportunity for lower-income, non-White households that may have been priced out and excluded from housing mobility opportunities to access resources in higher-income neighborhoods while facilitating income integration and reducing concentrations of non-White populations in the central, southeastern and northeastern areas of the city designated as High Segregation and Poverty. The remaining 57.6 percent of lower-income sites are located within the tracts with higher concentrations of non-White households to increase housing resources for residents who may otherwise be priced out and are vulnerable to displacement in their own neighborhoods.

POPULATION Total RHNA Capacity 45.2% 31.9% 22.9% Above Moderate-Income 57.6% 39.6% 2.8% Capacity Moderate-Income 52.8% 41.5% 5.7% Capacity Lower-Income Capacity 25.1% 17.3% 57.6% 0.0% 20.0% 40.0% 60.0% 80.0% 100.0% ■ 40% to 59.9% of the population ■ 60% to 79.9% of the population

FIGURE 1L-25 PERCENTAGE OF UNIT CAPACITY BY PERCENT NON-WHITE

Source: 2015-2019 ACS; City of Reedley, 2023

As shown in **Figure 1L-25**, much of the moderate- and higher-income unit capacity (47.2 and 42.4 percent) is identified on sites in areas that have non-White populations above 60.0 percent, which will facilitate income integration and housing mobility opportunities, through a more diverse range of housing types, which in turn fosters the potential to raise the resource designation. Additional moderate- and above moderate-income units in areas with lower proportions of non-White population will increase housing mobility opportunities in the highest resource areas of the city.

Disability

Approximately 11.1 percent of Reedley's population lives with one or more types of disability, as shown on Figure 2-32, Percentage of Population with a Disability in the Housing Needs Assessment. As discussed previously, data indicates that a smaller proportion of residents in Reedley's high- and highest-resource areas are living with disabilities compared to lower-income, lower-resource areas, and that those residents who are living with a disability are found at higher rates in lower-income areas.

As illustrated by Figure 1L-26, Percentage of Unit Capacity by Disability Rate, approximately 22.0 percent of the total RHNA capacity identified in the sites inventory is in areas in which fewer than 10.0 percent of residents have a disability in the northwest and northeast tracts of the city, 32.8 percent in west of the San Joaquin Valley Railroad, the downtown and in the southeast areas in which 10.0 to 14.9 percent of residents have a disability, and 45.2 percent in areas north of Parlier Avenue and east of Buttonwillow Avenue in which more than 15.0 percent of residents have a disability. As stakeholders identified, high housing costs and a shortage of permanently supportive housing in the county has generally increased displacement risk for residents with disabilities and presents a barrier to persons with disabilities.

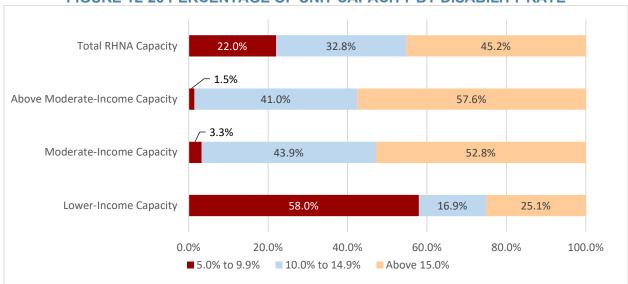


FIGURE 1L-26 PERCENTAGE OF UNIT CAPACITY BY DISABILITY RATE

Source: 2015-2019 ACS; City of Reedley, 2023

Approximately 58.0 percent of the lower-income unit capacity and 3.3 percent of moderate-income capacity is identified in the northwest tract in the vicinity of Reedley College, the commercial and office node at the western entry to the city on Manning Avenue, and the northeast neighborhoods in the Area of High Segregation and Poverty. Locating units affordable to lower- and moderate-income residents in and around this major commercial center will help to improve access for and accommodate the needs of persons living with disabilities, who benefit from close access to services and amenities as well as proximity to transit.

An additional 16.9 percent of the lower-income unit capacity, as well as 43.9 and 41.0 percent of moderate-and above moderate-income unit capacity, respectively, has been identified on sites where the rate of disabilities ranges from 10.0 to 14.9 percent of the population, providing housing mobility and additional affordable housing supply opportunities in the vicinity of the downtown to access resources for all income categories. Neighborhoods where more than 15.0 percent of the population experience disabilities in the northern- and eastern-most portions of the city, have the highest proportion of above moderate-income unit capacity (57.6 percent), 52.8 percent of moderate-income capacity, and 25.1 percent of lower-income unit capacity, providing housing opportunities for persons with disabilities at all income levels.

Familial Status

As previously discussed, 7.3 percent of the households in the city are single females with children, of whom 29.5 percent had incomes below the poverty level, which suggests that single-parent, female-headed households may have more limited access to housing. The spatial distribution of single-parent, female-headed households with children as a percentage of total households is generally consistent with TCAC/HCD Opportunity Area designations and median household incomes.

Within the city's Area of High Segregation and Poverty, and the northwestern and eastern portions of the city, rates of single female-headed households with children range between 20.0 and 40.0 percent, corresponding to most of the city's affordable housing resources. As presented in Figure 1L-27, Percentage of Unit Capacity by Percentage of Children in Female-Headed Households, approximately 46.5 percent of lower-income unit capacity is in areas with the highest rate of children in female-headed households. Housing unit potential on these sites increases the opportunities for female-headed households currently experiencing overpayment and/or overcrowding to acquire affordable and adequately sized housing with access to downtown and Manning Avenue businesses and services. Additionally, 55.3 percent of the moderate-income anticipated units and 58.9 percent of above moderate-income unit capacity in the areas with higher representations of children in female-headed households will increase housing mobility opportunities for moderate-income single, female-headed households, as well as all other household types, to find appropriate units within Reedley, while contributing toward de-concentration of high rates of poverty, inclusive of female-headed households with children with incomes below the poverty level. Overall, female-headed households of any economic status will have access to new housing opportunities, as well as other single-parent households, persons living alone, seniors, lower-income families, and other households.

FEMALE-HEADED HOUSEHOLDS **Total RHNA Capacity** 53.5% 46.5% Above Moderate-Income 41.1% 58.9% Capacity Moderate-Income Capacity 55.3% 44.7% Lower- Income Capacity 74.2% 25.8% 0.0% 20.0% < 10.0% of households 60.0% 80.0% 20.0% to 29.9% of households 40.0% 100.0%

FIGURE 1L-27 PERCENTAGE OF UNIT CAPACITY BY PERCENTAGE OF CHILDREN IN

Source: 2015-2019 ACS; City of Reedley, 2023

Potential Effect on Access to Opportunity

Job and Transit Proximity

Reedley residents are served by the Fresno County Rural Transit Agency (FCRTA), providing fixed-route service on the Orange Cove Transit, Sanger-Reedley College Transit, Kingsburg-Reedley College Transit, and the Dinuba Connection, an FCRTA route provided in partnership with Dinuba Area Regional Transit (DART) (see Figure 3-19, Fresno County Rural Transit Agency Intercounty Routes). However, some neighborhoods remain less accessible by transit, including those north of West Parlier Avenue, east of North Buttonwillow, and the southwest portion of the city.

The prevalence of residential uses with strong access to Fresno's job market and a large proportion of persons commuting outside of the city for employment is reflected in the index scores between the 20th to 40th percentile in the majority of the city, with higher ranking scores in the higher income and highest resource western portions of the city. The central and northeastern portion of Reedley reflect the lowest job proximity percentiles, scoring below the 20th percentile. As shown in **Figure 1L-28**, **Percentage of Unit Capacity by Jobs Proximity Index Scores**, 24.1 percent of the RHNA unit capacity is sited in areas with the highest jobs proximity index score on the western edge of the city, including 38.2 percent of moderate-income and 37.2 percent of above moderate-income unit capacity, thus improving access to employment opportunities at the Manning Avenue commercial area and north towards Fresno. As the city is predominantly residential, siting of unit capacity in the higher proximity areas will aid in improving access to employment opportunities both inside and outside of the city and will locate housing near more highly trafficked areas that are currently serviced by intra-city transit providers, providing close proximity to transit for occupants of these units and potentially decreasing the city's cumulative level of vehicle miles traveled to access jobs and the associated environmental impacts of this travel.

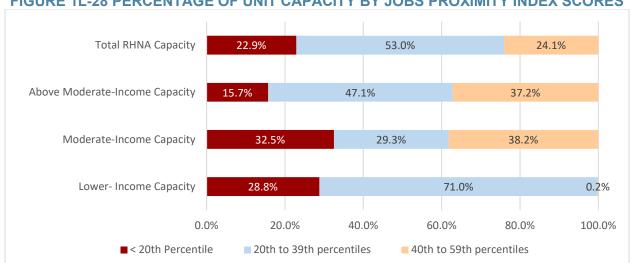


FIGURE 1L-28 PERCENTAGE OF UNIT CAPACITY BY JOBS PROXIMITY INDEX SCORES

Source: HUD (2014-2017); City of Reedley, 2023

While a greater share of lower-income (71.0 percent), moderate-income (29.3 percent) and above moderate-income (47.1 percent) unit capacity is projected in areas scoring between the 20th and the 40th percentile, these units provide improved housing mobility opportunities for all residents. An additional 22.9 percent of the units are identified in areas with the lowest jobs proximity index scores. The lower scores in the eastern City Center East may partially be attributed to the differential in the type of employment the residents of this neighborhood are engaged in, compared to the types of employment available in the downtown. When considering where to locate future housing for all income levels, and particularly lower-income units, sites with access to Manning Avenue to connect towards SR 99 and Fresno offers the most convenient access to jobs available within the city and transit to other parts in the region. Further, construction of these sites will help to further improve the jobs-housing ratio with residential development in and near commercial and transit corridors as well as mixed-income development, thus improving jobs proximity for current and future residents of Reedley.

Environmental Health

As previously discussed, and shown on **Figure 1L-15**, **CalEnviroScreen Scores**, census tracts on the northeast side of the city score between the 91st and 95th percentiles for environmental conditions, compared to the 71st percentile in the northwest corner and the 63rd percentile within the northern and eastern communities. This pattern is consistent with the spatial pattern demonstrated by other indicators of access to opportunity, such as median household income, poverty status, and proximity to jobs. Although scores in the southwest side range between the 76th to 80th percentiles, proximity to the Kings River, agricultural and resource extraction activities, and groundwater threats likely contribute to the higher scores. This indicates that residents in Reedley may have varying access to environmental conditions, depending on the area of the city in which they live.

Further, the residential areas in the City center, as well as the western portion of the city adjacent to the river fall within the boundaries of areas considered SB 535-qualifying disadvantaged communities - the 25 percent highest scoring census tracts in CalEnviroScreen 4.0. This indicates that, compared with statewide averages, portions of Reedley represent an area of potential concern regarding fair housing and disproportionate exposure to environmental hazards and a concentration of vulnerable populations.

As presented in Figure 1L-29, Percent of Unit Capacity by CalEnviroScreen Percentiles, approximately 45.2 percent of the sites inventory capacity has been identified in neighborhoods scoring in the 60th to 75th percentiles north of West Parlier Avenue and east of Buttonwillow Avenue, and the northwest corner of the city including Reedley College. These sites have capacity for 57.6 percent of above moderate-income unit capacity, 52.8 percent of the moderate-income capacity, and 25.1 percent of lower-income capacity, including one mixed-income site (site 29). The majority of these sites are in areas at the edges of the city, adjacent to agricultural uses, which suggests these factors influence the environmental outcome score.

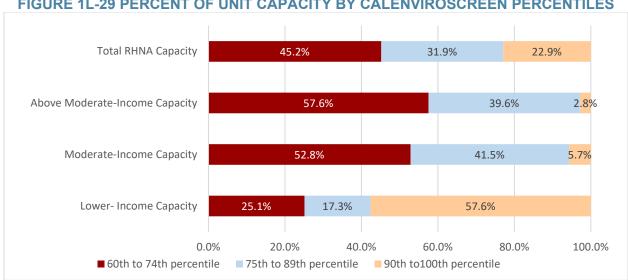


FIGURE 1L-29 PERCENT OF UNIT CAPACITY BY CALENVIROSCREEN PERCENTILES

Source: California OEHHS 2021; City of Reedley, 2023

The majority of site capacity for all income levels (54.8 percent) is identified in areas scoring at or above the 75th percentile. Development potential in the higher scoring (disadvantaged community) areas is envisioned to improve environmental conditions through incorporation of outdoor spaces, transitional buffers and screening between residential and non-residential uses, and promotion of pedestrian and bicycle facilities, thus promoting environmental sustainability. Investment in the least positive-scoring areas in the City Center East, Columbia/East Early, Red Beaut Avenue, Duff and Buttonwillow, Rosewood Estates, North Haney, East Manning Avenue, North Pecan Avenue, and TL Reed neighborhoods through development of vacant sites with capacity at all income levels will facilitate place-based revitalization and will increase the supply of affordable housing in an area susceptible to displacement due to housing costs while also encouraging income integration in new development. As well, 42.4 percent of the above moderate-income capacity is identified in the western side of the city where scores are above the 75th percentile, providing above moderate-income housing mobility opportunities in the high resource area of the city. The distribution of 17.3 percent of the lower-income unit capacity in the western Shimzu, Shoemake and Beech, South Frankwood Valley, West Huntsman and Washington neighborhoods facilitates housing mobility opportunities in higher resource neighborhoods with improved access to commercial, employment and services, and promotes a reduction of concentration of poverty and lower-income households in the Area of High Segregation and Poverty neighborhoods with the least positive environmental scores.

Potential Effect on Displacement Risk

Overcrowding

As discussed previously, the rate of overcrowding is highest in the Area of High Segregation and Poverty and Area of High Segregation and Poverty, with 21.9 percent of households experiencing this problem, with the issue more prevalent among renters. As presented in **Figure 1L-30**, **Percentage Unit Capacity by Overcrowding**, the largest proportion of the unit capacity, 45.4 percent, is identified in areas of the city with lower overcrowding rates (below 12.0 percent) in the northwest Reedley College tract and the neighborhoods north of East Parlier Avenue and east of North Buttonwillow Avenue. In contrast, approximately 5.7 percent of moderate-income units and 57.6 percent of lower-income units are in areas with the highest rates of overcrowding to help to alleviate this issue by increasing the housing supply. The remainder of the lower- and moderate-income capacity will facilitate housing mobility opportunities throughout the city near services and resources in the Manning Avenue commercial area and in higher resource neighborhoods. Additionally, the inclusion of 42.4 percent of above moderate-income sites in the portions of the city with rates of overcrowding above 12.0 percent will ease pressure on the housing stock, thus potentially reducing displacement risk and overcrowding for these households as well as more units become available.

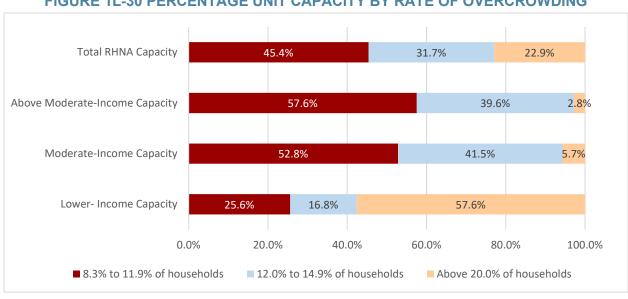


FIGURE 1L-30 PERCENTAGE UNIT CAPACITY BY RATE OF OVERCROWDING

Source: CHHS 2020; City of Reedley, 2023

Overpayment

Owners and renters throughout Reedley are overpaying for housing, likely due to increases in housing costs that have outpaced wage increases, with 23.0 percent of the households experiencing some level of overpayment, as shown by **Figure 1L-18**, **Renter Overpayment**, and **Figure 1L-19**, **Homeowner Overpayment**. Lower- and moderate-income households are most at risk of displacement due to overpayment, particularly renter households. Moderate-income renters have been most impacted by rising rental costs, while the increase in median home value has primarily impacted lower-income households.

Generally, the areas with poverty levels greater than 28.0 percent within the Area of High Segregation and Poverty also correlate with higher rates of rental overpayment rates, between 63.0 and 67.0 percent, which also aligns with high rates of homeowner overpayment. Although all census tracts in Reedley have homeowner overpayment rates between 30.0 and 40.0 percent, the highest rates of homeowner overpayment are found in the northwestern tract which includes Reedley College and the northern and eastern perimeter neighborhoods where newer single-family residential subdivisions are developing, although poverty rates are lower than in the central portion of Reedley. Additionally, previous analysis identified that special-needs populations, including female-headed households, large families, persons with disabilities and seniors, often fall into the lower-income category and may be particularly at risk of displacement when housing opportunities at affordable costs, sizes, or access to resources are not available.

As shown in Figure 1L-31, Percentage Unit Capacity by Rate of Renter Overpayment, the distribution of RHNA unit capacity identifies 57.6 percent of lower-income units, 5.7 percent of moderate-income units, and 2.8 percent of above moderate-income unit capacity in areas with the highest rates of renter overpayment in the Area of High Segregation and Poverty. An increase in the supply of lower- and moderate-income units throughout the city, particularly those in close proximity to commercial and services in the downtown, will help to alleviate conditions that contribute to overpayment by reducing the gap between supply and demand for this type of housing. The siting of the above moderate-income units in these neighborhoods will facilitate income-integration. As well, the identification of 25.1 percent of lower-income unit capacity in the northern and eastern perimeter neighborhoods also facilitates income-integration and increased access to resources.

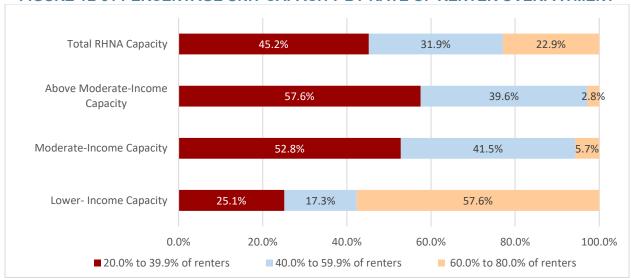


FIGURE 1L-31 PERCENTAGE UNIT CAPACITY BY RATE OF RENTER OVERPAYMENT

Source: 2015-2019 ACS; City of Reedley, 2023

As all of the city has homeowner overpayment rates between 30.0 and 40.0 percent of homeowners, all of the unit capacity falls within this homeowner overpayment range. However, 0.5 percent of the lower-income unit capacity is identified in tract 66.03 which has the highest rate of homeowner overpayment (36.7 percent) to help alleviate overpayment, while there are no moderate- or above moderate-income sites. Typically, above moderate-income units are unaffordable to cost-burdened households yet will provide housing mobility opportunities for higher-income households that may be overpaying due to limited availability of housing stock, while lower- and moderate-income housing units can help alleviate overpayment. Sites for new units have been identified across a range of overpayment rates for both owners and renters with the intent of increasing the supply of affordable housing for all income categories, thus reducing risk of displacement due to overpayment for all Reedley residents.

Special-needs groups that may be disproportionately affected by high housing costs include large families, single-parent households, and seniors. As discussed in the Overcrowding analysis, large family households often face housing challenges due to a lack of adequately sized affordable housing available. The higher costs of homes with multiple bedrooms can result in larger families experiencing a disproportionate cost burden and increase the risk of housing insecurity. The ACS also reports that single-parent households comprise 23.7 percent of the total households in Reedley, the majority of which are female single parents. Of female-headed, single-parent households, 29.5 percent are below the poverty threshold, indicating that these households may have to spend a greater percentage of their income on housing and are at risk for displacement without assistance. However, the identification of 41.0 percent of lower-income unit capacity in tracts with higher resource opportunity provides additional housing supply to alleviate overpayment suggests that single female householders with children may be able to obtain housing in the vicinity of higher resource opportunities.

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Seniors, comprising 20.6 percent of Reedley's households, often face increased displacement risk due to overpayment as this population more frequently relies on fixed incomes, such as retirement savings or social security, with approximately 35.1 percent of seniors falling in the extremely low-income category. Additionally, 72.8 percent of all seniors are homeowners, a portion of which are likely to be lower income, indicating a need for affordable ownership units that accommodate the needs of seniors, as well as other persons with disabilities or special needs. Therefore, the addition of these units will 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, as well as responding to meeting demand of special-needs populations. Further, the site capacity and distribution of units by income category will facilitate mobility opportunities for all households.

Contributing Factors

Through discussions with stakeholders, fair housing advocates, and this assessment of fair housing issues, the City identified factors that contribute to fair housing issues, as shown in **Table 1L-15**, **Factors Contributing to Fair Housing Issues**. While there are several strategies identified to address the fair housing issues, the most pressing issues are the presence of High Segregation and Poverty conditions and characteristics and a citywide disproportionate housing need for renters. The combination of these factors presents challenges to housing and economic mobility in the short and near term for many households, particularly lower-income households. Prioritized contributing factors are **bolded** in **Table 1L-15** and associated actions to meaningfully affirmatively further fair housing related to these factors are **bold and italicized**. Additional programs to affirmatively further fair housing are included in **Section 1L-1**, **Action Plan**.

Table 1L-15 Factors Contributing to Fair Housing Issues

AFH Identified Fair Housing Issue	Contributing Factor	Meaningful Actions
Exposure to adverse environmental conditions	Proximity to commercial agricultural and natural resource extraction	Evaluate transitional buffers between residential and agricultural uses and highways (Program 27)
	Proximity to State Route 99 traffic	
Displacement risk due to overcrowding in the northeastern portion of	Low housing vacancy rate for both owners and renters	Incentivize development of affordable housing to meet a range of housing needs and sizes (Program 7)
the city	Rising rental prices	Encourage the construction of ADUs, particularly in higher income single-family areas (Program 12)
		Encourage a variety of housing types (Program 14)
		Develop a marketing program to educate housing providers on the benefits of accepting HCVs (Program 25)
Area of High Segregation and Poverty	Concentration of affordable housing complexes	Incentivize development of affordable housing to meet a range of housing needs and sizes (Program 7)
	Older housing stock which tends to be naturally more affordable	Facilitate the provision of farmworker housing (Programs 8 and 9)
	Costs of home repairs and rehabilitation	Incentivize development of housing for extremely low-income households (Program 10)
	High housing costs	Encourage the construction of ADUs, particularly in higher income single-family areas (Program 12)
		Encourage a variety of housing types (Program 14)

AFH Identified Fair Housing Issue	Contributing Factor	Meaningful Actions	
		Provide repair and rehabilitation assistance (Programs 20 and 21)	
		Improve housing conditions in areas of need through code enforcement (Program 22)	
		Develop a marketing program to educate housing providers on the benefits of accepting HCVs (Program 25)	
Disproportionate displacement risk for	Low housing vacancy rate for both owners and renters	Preserve affordable housing stock at risk of conversion (Program 11)	
renters	Rising rental prices increasing overpayment Rising sales prices as a possible barrier to homeownership Focus on affordable development means a shortage of market-rate units	overpayment Rising sales prices as a possible barrier to homeownership Focus on affordable development	Encourage a variety of housing types to address the housing needs of a variety of household types, sizes, and incomes. (Program 14)
			Meet with developers to ensure fees to do not constrain development of multifamily housing (Program 17)
		Promote the availability of the Homeowners Down Payment Assistance Program particularly in areas with concentrations of renters (Program 23)	
		Rental property owner and management company education on benefits of HCVs. (Program 25)	

SECTION 1L-4: CONSTRAINTS

Land Use Controls

General Plan

Analysis

Reedley recently adopted its 2030 General Plan. The General Plan includes four residential land use designations and two commercial land use designations that allow residential, as shown in **Table 1L-16**.

Table 1L- 16 Land Use Designations

Designation	Allowable Density (units per gross acre)	Typical Uses	Compatible Zoning					
Residential Designations								
Suburban Residential	1.0-4.0	Single Family detached residential development; not to exceed a minimum 10,890 sq. ft. to maximum 1-acre lot area (1–4 dwellings/per acre).	Low Density Residential					
Low Density Residential	4.1-8.0	Single Family detached residential development; not to exceed a minimum 5,445 sq. ft. lot area (4–8 dwellings/per acre).	Suburban Residential Medium Density Residential					
Medium Density Residential	8.1–15.0	Single Family detached or Multiple-family residential development; not to exceed a minimum 2,904 sq. ft. to maximum 5,445 sq. ft. lot area (8–15 dwellings/per acre).	Low Density Residential Suburban Residential					
High Density Residential	15.0–29.0	Single Family detached residential development; not to exceed 1,500 sq. ft. (15–29 dwellings/per acre)	Low Density Residential Suburban Residential Medium Density Residential Administrative and Office Commercial Community Commercial Neighborhood Commercial					
Commercial Des	ignations							
Central Downtown Commercial Community Commercial Service Commercial	15.0–29.0	Outside the central core, wide range of retail business and compatible services designed to serve the entire community.	Low Density Residential Suburban Residential Medium Density Residential Neighborhood Commercial Central and Community Commercial District Service Commercial					
Office Commercial Neighborhood Commercial	8.0 – 15.0	Administrative, business, medical, professional, and general offices Various intensities of commercial activities serving a local area; not to exceed 5-acres in size.	Professional Office Administrative and Office District					

Source: City of Reedley 2022.

Conclusion

The City offers a range of housing densities in the community, from one dwelling unit per acre (du/ac) to 29 du/ac in residential designations. The Central Downtown designation permits densities up to 30 du/ac. These densities allow for a variety of housing types, including high-density affordable housing.

Recommended Action

None required.

Zoning Ordinance

Analysis

The City's Zoning Ordinance provides for three residential districts and encourages mixed-use development in six nonresidential zones in an effort to promote a walkable environment in a locale where residential uses are in close proximity to places of employment and commerce. Mixed-use projects are allowed by right in the commercial zones listed in **Table 1L-17** and as a conditional use in the industrial zone. Mixed-use projects can either be arranged as vertical mixed-use (i.e., commercial on the ground floor and residential above) or as horizontal mixed-use (i.e., separate but adjacent buildings containing commercial and residential uses). Mixed-use zones do not allow 100 percent residential projects but have no minimum requirement for commercial; therefore, a project can be 99 percent residential and 1 percent nonresidential. Typically, as described further in **Section 1L-2**, **Sites Inventory**, mixed-use projects in Reedley are almost entirely residential with a small nonresidential component.

Table 1L- 17 Residential Zoning Districts

Zoning District	Allowable Density (du/acre)		Purpose
Residential Estate (RE)	0.15	5 du/ac	The RE District is designed as an area of transition or changing character between the rural agricultural area and more urban areas.
One-Family Residential (R)	R-1-6 R-1-7 R-1-9 R-1-12	7.26 du/ac 6.22 du/ac 4.84 du/ac 3.63 du/ac	The R Districts are intended primarily to provide living areas at locations designated by the General Plan for low and medium density involving single-family dwellings.
	RM-2	21.78 du/ac	The RM-2 district is intended for areas designated by the general plan for high density.
Multifamily Residential (RM)	RM-3	14.52 du/ac	The RM-3 district is intended primarily for areas designated by the general plan for medium density, and in older, basically single-family residential areas of the community where vacant property has been bypassed because of excessive size, irregular shape, or difficulty in providing public access.
Multifamily Residential Specific Plan (RM-SP)	RM-2	21.78 du/ac	When the City adopted the 2030 General Plan, the City incorporated policies from the 2008 Reedley Specific Plan into the General Plan. Such policies include properties that are zoned RM-SP are required to be consistent with the High Density Residential General Plan Designation and RM-2 zone district. Since there are fewer than 20 parcels in the City zoned as RM-SP, per Program, 15, the City will remove RM-SP from the zoning map. Affected parcels will be zoned RM-2.
Professional Office District (PO)	d Multifaı	amily: 7.28 lu/ac mily: 21.78 lu/ac	The PO professional office district is intended to provide opportunities for professional and commercial offices in close relationship to one another in areas designated for combined professional office use, including high density use, by the general plan. Any use permitted in any R or RM district is permitted in this district. A mixed-use project is a "by right" use, and the integrated residential use must be developed in accordance with the Medium Density Residential General Plan land use designation.
Administrative and Office District (C-AO)	21.78 du/ac		The C-AO administrative and office commercial district shall provide for the development of an integrated professional district where related and complementary types of uses and facilities may be located in areas adjacent to or in the vicinity of residential uses and act as a land use and architectural buffer between residential neighborhoods and more intense uses of land.
Neighborhood Commercial District (CN)	21.78 du/ac		The CN neighborhood commercial district is intended exclusively for the provision of retail and personal service facilities to satisfy the convenience goods needs of the consumer relatively close to their place of residence and at locations designated neighborhood commercial by the general plan.
Central and Community Commercial District (CC)	15.	1–29.0	The CC central and community commercial district is intended to be applied to the central commercial core of the city and to community commercial areas outside of the central core, as designated by the general plan. These areas constitute the primary commercial districts of the community where a wide range of retail, financial, governmental, professional, business, service, and entertainment activities and uses are encouraged to concentrate to serve the entire community. Community commercial areas outside

Zoning District	Allowable Density (du/acre)	Purpose
		of the city's commercial core are intended to be developed into unified commercial centers wherever possible. (Ord. 94-016, 7-12-1994)
Service Commercial District (CS)	15.1–29.0	The CS service commercial district is intended primarily for establishments engaged in servicing equipment, materials and products, but which do not require the manufacturing, assembling, packaging or processing of articles or merchandise for distribution and retail sale. Land requirements for most commercial service uses generally dictates its application along arterial streets of the city which generally lie close to central commercial and industrial districts, in accordance with the general plan. (Ord. 622, 9-2-1980).
Light Industrial District (ML)	$8.0-20.0^{1}$	The M industrial districts are included in this title to achieve the following purposes: to reserve appropriately located areas for various types of industrial plants and related activities; to protect areas appropriate for industrial use from intrusion by residences and other inharmonious uses; to protect residential and commercial properties and nuisance-free nonhazardous industrial uses from noise, odor, dust, dirt, smoke, vibration, heat, glare, fire, explosion, noxious fumes, radiation, and other hazardous and objectionable influences incidental to certain industrial uses; to provide opportunities for certain types of industrial plants to concentrate in mutually beneficial relationships to each other; to provide adequate space to meet the needs of modern industrial development, including off-street parking and truck-loading areas; and to provide industrial employment opportunities for residents of the city.
Resource Conservation and Open Space District (RCO)	0.2 du/ac	The RCO resource conservation and open space district is intended to provide for permanent open spaces in areas of the community that exhibit significant vegetation, scenic qualities, wildlife, or recreation potential and that are designated open space or school and college sites by the general plan.
Urban Reserve District (UR)	0.1 – 3.6 du/ac1	The purposes of this district are to: preserve the availability of lands required for future urban expansion; expedite the limited conversion of such lands to urban uses consistent with the general plan through the granting of a conditional use permit in lieu of requiring change of zone (amendment) procedure prior to actual development; and to prevent the premature development of lands where the range of municipal type services required by the general plan is not yet available.

Source: City of Reedley Municipal Code 2022, accessed October 2022.

¹ Minimum residential density varies based on acreage of the site in the ML district: 4–10 net acre site, 8 du/ac minimum; 11–15 net acre site, 15 du/ac minimum; 16+ net acre site, 20 du/ac minimum. The municipal code does not provide a maximum density.

Planned unit developments (PUD) are also encouraged to achieve a more functional and harmonious environment than otherwise might be possible by strict adherence to zoning regulations. A PUD may include a combination of different dwelling types and/or a variety of land uses that are designed to complement each other and harmonize with existing and proposed land uses in the vicinity. A PUD may be in any district on the granting of a conditional use permit.

Conclusion

The City's Zoning Ordinance provides for a range of housing options and offers several opportunities for higher-density residential and mixed-use development by right.

Recommended Action

None required.

Residential Development Standards

Analysis

Table 1L-18 summarizes basic residential development standards for Reedley. The table indicates the minimum lot size requirements, minimum site area per unit, setbacks, height restrictions, and parking and open space requirements that apply in each of the city's residential zoning districts. Consistent with Government Code Section 65940.1(a)(1) related to transparency requirements, the zoning and development standards for all parcels in the city are available on the City's website.

Table 1L- 18 Development Standards in Zones Allowing Residential and Mixed Use, Reedley

Zone District	Min. Lot Area	Density (du/acre)	Height (ft.)	Minimum Lot Dimensions (ft.) Minimum Yard Setback (ft.)		Lot Coverage	Space Between			
	(sq. ft.)	,	,	Width	Depth	Front	Side	Rear	,	Structures
RCO	5 acres	5 acres	35			No lin	nitations			
UR	n/a	4–15	n/a			INO IIII	ilitations	i		
RE	300,000	1–4	40	175	150	40	20	20	45%	
R-1-12	12,000		35	90	120	25	5	10	40%	
R-1-9	9,000	4–8 du/ac	35	70	70 100 25 5 10 40%					
R-1-7	7,000	4-8 du/ac	35	65	95	20	5	10	40%	
R-1-6	6,000		35	60	90	20	5	10	40%	10
RM-3	3,000	8.1-15.0	35	50	100	15	5	5	50%	10
RM-2	2,000	15–29	35	50	100	15	5	5	60%	
PO	n/a	8–15		50	100	15	5	5	65%	
C-AO	n/a	8–15	35	n/a	n/a	15	n/a	n/a	n/a	
CN	n/a	8–15	50	n/a	n/a	15	n/a	n/a	n/a	
CC	n/a	15–29	75	n/a	n/a	0	n/a	n/a	n/a	
CS	n/a	15–29	75	n/a	n/a	0	n/a	n/a	n/a	
ML	n/a	8+ du/ac1	75	n/a	n/a	10	n/a	n/a	n/a	

Source: City of Reedley Zoning Ordinance 2022.

Note: Consult the City of Reedley Zoning Ordinance for detailed information for each zone district.

Parking

Table 1L-19 summarizes residential parking standards in Reedley. The City allows shared parking or "joint use" parking for mixed-use developments with Planning Commission approval. The City also waives off-street parking requirements in the Downtown Commercial District, which applies to any parcel in the area bounded by 10th and 12th Streets and the first alleys east and west from G Street (Reedley Municipal Code, Chapter 9, Downtown Parking and Business Improvement Area). As denoted below the City has included **Program 15** to reduce parking standards for multifamily dwellings to mitigate possible constraints on development.

¹ Minimum residential density varies based on acreage of the site in the ML district: 4–10 net acre site, 8 du/ac minimum; 11–15 net acre site, 15 du/ac minimum; 16+ net acre site, 20 du/ac minimum. The municipal code does not provide a maximum density.

Table 1L- 19 Residential Parking Standards, Reedley

Residential use	Required Parking Spaces
One-Family Dwellings	2 spaces per dwelling unit
Two-Family, Three-Family, and	1.5 spaces per dwelling unit + 2 spaces per dwelling unit, one of
Multifamily Dwellings	which must be covered
Elderly Housing	1 space per dwelling unit, provided that sufficient space must be set aside for 1.5 spaces per dwelling unit in the event of a change of use
Accessory Dwelling Unit	1 additional uncovered off-street parking space per unit or per bedroom
Emergency Shelters	No established standards ¹

Source: City of Reedley Zoning Ordinance 2022.

Open Space and Park Requirements

The City's current development impact fee schedule requires the payment of a Parks and Recreation Impact fee that varies depending on the unit type and density and area of the city. The development impact fee ranges from \$3,335.91 to \$6,671.77 for single family units, \$3,204.23 to \$6,408.41 for multifamily units, and \$833.98 to \$1,667.94 for accessory dwelling units (**Table 1L-20**). The City has a commercial rate of \$766.91 to \$1,533.81 per thousand square feet of development, an industrial/warehouse rate of \$210.69 to \$421.38 per thousand square feet of development, and public/institutional rate of \$117.99 to \$235.97 per thousand square feet of development. The development impact fee is designed to ensure the City achieves its park standard of four acres of parks per 1,000 persons.

Table 1L- 20 Parks and Recreation Development Impact Fee

Residential Use	Fee (per dwelling unit)						
Residential Ose	Expansion Area City Center		Infill Area				
Single Family	\$6,671.77	\$3,335.91	\$5,003.84				
Multifamily	\$6,408.41	\$3,204.23	\$4,806.32				
Accessory Unit	\$1,667.94	\$833.98	\$1,250.96				

Source: City of Reedley Master Fee Schedule, 2022.

¹ Concurrently with this Housing Element update, the City is updating the Zoning Code to establish development standards for emergency shelters, including parking requirements. **Program 15** has been included to ensure compliance with state law.

Cumulative Impact of Development Standards

The City evaluated the cumulative impact of its land use controls on the cost and supply of housing, including development standards that limit sites' building envelope (setbacks, private open space, and parking) and lot coverage restrictions. Based on this evaluation, none of the land use controls in conventional residential zoning districts would prevent an applicant from reaching the maximum density allowed for single-family developments in single-family zones and multifamily developments in all zones where multifamily is allowed, or otherwise constrain housing development. Current development standards for the residential zones that permit multifamily housing were applied to theoretical sites of varying size. The results confirmed the above conclusion, and each scenario achieved the respective zone's maximum allowable density.

On sites from one-quarter acre to one-half acre, a multifamily housing development in the RM-2 and RM-3, Central and Community Commercial (CC) designations could achieve maximum density with a mix of studio, one-, and two-bedroom units served by on-site covered and uncovered (screened) parking. Sites larger than one-half acre were not evaluated, as development standards do not become more restrictive as parcel sizes increase. The City also analyzed theoretical development capacity on minimum lot size parcels in the RM-2 and RM-3 zones. Even on the smallest sites, maximum density could be achieved with a mix of studio and one-bedroom units served by a combination of covered and uncovered (screened) parking. Covered parking is counted toward the maximum building footprint, and uncovered parking is not. Density bonus units are not factored into the calculations.

The City currently requires 2 parking spaces for each One-Family Dwelling and 3.5 parking spaces for each Two-Family, Three-Family, and Multifamily Dwelling. However, per **Program 15**, the City will reduce parking standards for multifamily dwellings to mitigate possible constraints on development. As demonstrated herein, setbacks do not preclude achieving maximum densities, however according to City staff, the most typical type of waiver requested is for a reduction in setback requirements. Setback waivers are not difficult to obtain and therefore are not considered a constraint. They are approved with the same process described in this chapter in the subsection called Conditional Use Permit Process and Variance, unless the request is for a change that is less than 10 percent of the requirement, in which case they would be considered a minor deviation. Section 10-6C-5 of Reedley's Municipal Code establishes a site area per dwelling unit requirement consisting of 3,000 sq. ft. in the RM-3 zone and 2,000 sq. ft. in the RM-2 zone. However, according to City staff, the densities established by the General Plan take precedence over this requirement. Furthermore, per **Program 15**, the City will remove the site area per dwelling unit requirements in its comprehensive zoning code update.

Residential units in the CC zone are only allowed as part of a mixed-use development. Per the city's municipal code Section 10-13-9.B.2, projects in the CC zone must be developed in accordance with the RM-2 zone's development standards. As such, the City did not specifically evaluate development scenarios in the CC zone, as the analysis of the RM-2 zone would also apply to a theoretical site in the CC zone.

Similarly, residential development in the ML zone is restricted to mixed-use projects only. Given the zone's minimum project size requirement (4 acres), fairly modest setbacks (10 front, 15 back, 15 side), and maximum height allowance (75 feet) the City is confident that high-density residential projects would not be hindered by the current development standards. Therefore, the City did not specifically evaluate development scenarios in the ML zone.

All zones were evaluated with hypothetical sites in the manner described herein. Interior lots with three-story products were evaluated, as this condition enforces the most restrictive setback requirements.

The maximum allowed densities in the RM-2 and RM-3 zones are 29 units per acre and 15 units per acre, respectively. The general development standards for both the RM-2 and RM-3 zones are identical, with the exceptions of maximum lot coverage and maximum density. Comparing two hypothetical site sizes (one half acre and 6,000 sq. ft.), maximum allowed densities are achievable on sites in both zones, as demonstrated below.

The first step in the analysis was to determine the allowable building footprint given the site size and the maximum lot coverage. The next step was to determine the maximum allowed building envelope given the site area minus the required setbacks, open space, and parking. Since the RM-2 and RM-3 zones allow buildings up to 35 feet (three stories), the building envelope was multiplied by three to determine the maximum building square footage.

Hypothetical RM-2 Site A

a. Square footage: 22,000

b. Length: 200 feet

c. Width: 110 feet

d. Maximum allowed lot coverage: 0.6

- e. Maximum building footprint, given lot coverage requirement: 13,200 sq. ft.
- f. Maximum building envelope, given setbacks (15, 10, 15, and 15 feet), private open spaces (10% of lot area) and parking requirements (52.5 spaces at 200 sq. ft. each): 8,000 sq. ft.

g. Number of units: 15

h. Average unit square footage: 1,600

i. Density (units/acre): 29 allowed; 29 achievable

Hypothetical RM-2 Site B

a. Square footage: 6,000

b. Length: 100 feet

c. Width: 60 feet

d. Maximum allowed lot coverage: 0.6

- e. Maximum building footprint, given lot coverage requirements: 3,600 sq. ft.
- f. Maximum building envelope, given setbacks (15, 10, 15, and 15 feet), private open spaces (10% of lot area) and parking requirements (14 spaces at 200 sq. ft. each): 850 sq. ft.
- g. Number of units: 4

h. Average unit square footage: 638

i. Density (units/acre): 29 allowed; 29 achievable

Hypothetical RM-3 Site A

a. Square footage: 22,000

b. Length: 200 feetc. Width: 110 feet

d. Maximum allowed lot coverage: 0.5

e. Maximum building footprint, given lot coverage requirement: 11,000 sq. ft.

f. Maximum building envelope, given setbacks (15, 10, 15, and 15 feet), private open spaces (10% of lot area) and parking requirements (28 spaces at 200 sq. ft. each): 7,200 sq. ft.

g. Number of units: 8

h. Average unit square footage: 2,700

i. Density (units/acre): 15 allowed; 16 achievable

Hypothetical RM-3 Site B

a. Square footage: 6,000

b. Length: 100 feet

c. Width: 60 feet

d. Maximum allowed lot coverage: 0.5

e. Maximum building footprint, given lot coverage requirements: 3,600 sq. ft.

f. Maximum building envelope, given setbacks (15, 10, 15, and 15 feet), private open spaces (10% of lot area) and parking requirements (14 spaces at 200 sq. ft. each): 1,250 sq. ft.

g. Number of units: 2

h. Average unit square footage: 1,875

i. Density (units/acre): 15 allowed; 15 achievable

Conclusion

While most of the City's residential development standards do not act as a constraint to development of new housing and affordable housing, parking requirements for multifamily units may pose a barrier to construction of these units. In contrast, height and setback requirements relate well to the densities permitted, and lot size requirements are reasonable. The park standard is typical and does not provide a constraint to development. While densities established by the General Plan take precedence over the site area per dwelling unit requirement in Section 10-6C-5 of Reedley's Municipal Code, the City will remove these requirements in its comprehensive zoning code update.

Recommended Action

The City has included **Program 15** to establish parking requirements for emergency shelters in compliance with state law, reduce parking requirements for multifamily units and remove the site area per dwelling unit requirements in its comprehensive zoning code update.

Typical Densities for Development

The City of Reedley is a small city in Fresno County, located east of the Kings River and southeast of the City of Fresno and surrounded by agricultural land. Single-family residential lots generally vary in size from approximately 6,000 to 12,000 square feet in the low-density residential zone. Multifamily densities are typically between 20 to 30 units per acre depending on the land use designation. In the previous planning period, no sites identified to accommodate the lower-income RHNA in the inventory were developed below

the minimum allowable density of the zone in which the site is located, and the City did not receive any requests to develop below the assumed capacity in the sites inventory. In the event that a developer made this request, a map amendment would be required to develop below the minimum.

Growth Management

Analysis

The 2030 General Plan includes numerous goals and policies that promote compact development, infill development, and significant increases in residential densities. The Land Use Element also contains Policy LU 2.5.8, which states:

The City shall not support annexing land for residential development until at least eighty (80) percent of the existing residentially designated land inside the city limits is developed.

While this policy can serve to restrict the timing of future annexations, it does not impact the City's ability to accommodate its regional housing needs allocation (RHNA). On June 5, 2014, the Planning Commission received a staff report indicating that 93 percent of residentially zoned land was developed. City council affirmed this finding though Resolution No. 2014-057. Since 2014, eight annexations have occurred to support residential development. All but one of these have been for the construction of market rate, single-family housing.

Conclusion

Since the City has adequate capacity within current city limits to meet its RHNA, and the percentage of residentially zoned land in the city exceeds the requirement of Policy LU 2.5.8, the growth management policy in the Land Use Element is not a constraint to meeting the city's housing needs and does not limit future annexations.

Recommended Action

None required.

Density Bonus

Analysis

Under current state law (Government Code Section 65915), cities and counties must provide a density increase of up to 80 percent over the otherwise maximum allowable residential density of the Municipal Code and the Land Use Element of the General Plan (or bonuses of equivalent financial value) when builders agree to construct housing developments with 100 percent of units affordable to low- or very low-income households.

The City's Zoning Ordinance does not contain density bonus provisions. Currently, developers can use the State law to pursue a density increase. The City's Zoning Ordinance does provide for an increase in the number of units in a project by as much as 35 percent through the Planned Unit Development process.

Conclusion

The City of Reedley's density bonus ordinance is outdated and does not comply with current State law, which requires a density bonus of up to 80 percent.

Recommended Action

The Housing Element contains **Program 15** to adopt a density bonus ordinance in compliance with State law.

Zoning for a Variety of Housing Types

Analysis

Table 1L-21 summarizes the housing types permitted and conditionally permitted under the Zoning Ordinance.

Table 1L- 21 Residential Uses Permitted by Zone, Reedley

Residential Use	RE	R-1	RM-2	RM-3	RCO	UR	РО	CA-O	CN	СС	cs	ML
Single Family Dwelling ¹	P	P	P	P	С	С	-	-	-	-	-	-
Multifamily Housing	-	-	P	P	-	С		-	ı	-	-	С
Manufactured Housing	P	P	P	P	-	С	-	-	-	-	-	-
Mobile Home Park	-	-	С	С	-	-	-	-	-	-	-	-
Employee Housing (for 6 or fewer when located in a single-family dwelling) ²	P	P	P	P	-	-	-	-	-	-	-	-
Employee Housing (for 7 or more)	-	-	С	С	-	1	-	-	-	-	-	-
Farm Employee Housing (36 beds or fewer)	-	-	-	-	P	P	-	-	ı	-	-	-
Emergency Shelters	-	-	-	-	-	-	-	-	P	P	P	P
Transitional Housing	P	P	P	P	-	С	-	-	-	-	-	-
Supportive Housing ⁵	P	P	P	P	-	C	P	-	-	-	-	-
Single Room Occupancy	-	-	P	-	-	-	-	-	-	-	P	-
Group housing facility (6 or fewer) ³	P	P	P	P	-	С	-	-	-	-	_	-
Group housing facility (7 or more) ³	С	С	С	С	-	С	-	-	ı	-	-	-
Accessory Dwelling Unit pursuant to § 10-6D ⁴	P	P	P	P	-	С	-	-	-	-	-	-
Mixed Use	-	-	-	-	-	-	P	P	P	P	P	С

Source: City of Reedley Zoning Ordinance 2022.

P: permitted, C: conditional use permit, "-"no provisions.

¹ The City has included Program 15 to remove single-family as a permitted use in the RM-2 zone.

² The City has included **Program 15** to permit employee housing for six or fewer employees in compliance with the State Employee Housing Act (Health and Safety Code Sections 17021.5 and 17021.6).

³ The City has included **Program 15** to allow residential care facilities, regardless of size, in all zones that permit residential uses of the same type, in accordance with the state definition of family.

⁴ The City has included **Program 15** to allow ADUs in all zones that allow both single family and multifamily residential uses, in compliance with Government Code Section 65852.2(a)(1).

⁵ As part of **Program 15**, to comply with AB 2162, the City will amend its code to permit supportive housing by-right in the UR, CA-O, CN, CC, CS, and ML zones. Additionally, it will amend its code to consider both transitional and supportive housing a residential use of property subject only to those restrictions that apply to other residential dwellings of the same type in the same zone.

Following are descriptions of the City's requirements for various housing types.

Multifamily

The Reedley Zoning Ordinance provides ample opportunities for multifamily housing. Multifamily dwellings are permitted by right in the RM-3, RM-2, and PO zones and by right as part of mixed-use developments in all commercial zones: the CA-O, CN, CC, and CS zones. Multifamily dwellings are also conditionally permitted as part of mixed-use developments in the ML zone.

Manufactured Housing

In compliance with Government Code Section 65852.3(a), the City permits manufactured housing on a permanent foundation in all zones allowing single-family residential uses in the same manner as stick-built homes. The City also permits mobile home parks with a conditional use permit in the RM-2 and RM-3 zones.

Farmworker/Employee Housing

The City's agricultural uses, especially fruit trees, may use seasonal labor. The American Community Survey (ACS), 2015-2020, estimates that there were 2,509 agriculture jobs in Reedley in 2020 (see Table 2-9). Since the ACS (2015-2020) indicates a high number of agricultural jobs in Reedley, there is demand for seasonal farm worker housing because Reedley is surrounded by agricultural land. By the nature of the profession, it is difficult to determine the number of seasonal farm laborers that may be working in the agricultural areas surrounding the city.

Under California Health and Safety Code 17021.5 (Employee Housing Act), farmworker housing up to 12 units or 36 beds must be considered an agricultural use and permitted in any zone that permits agricultural uses. In addition, the Employee Housing Act requires employee housing for six or fewer employees to be treated as a single family use and permitted in the same manner as other dwellings of the same type in the same zone. The City permits agricultural uses in the Resource Conservation and Open Space (RCO) District and Urban Reserve (UR) District. The City amended the Zoning Ordinance in July 2015 to permit employee housing for six or fewer employees in all zones allowing single family units and permit farm employee housing of up to 12 units or 36 beds in the RCO and UR zones.

Emergency Shelters

In compliance with State law, the City of Reedley Zoning Ordinance defines emergency residential shelter as:

Housing with minimal supportive services for homeless persons limited to occupancy of six (6) months or less. No individual or household may be denied emergency shelter because of an inability to pay.

Government Code Section 65583(a)(4)(A), as amended by AB 2339, requires the City to identify one or more zoning designations that allow residential uses, including mixed uses, where emergency shelters are allowed as a permitted use without a conditional use or other discretionary permit and that are suitable for residential uses.. The legislation also requires that the City demonstrate site capacity in the zone identified to be appropriate for the development of emergency shelters. Within the identified zone, only objective development and management standards may be applied, given they are designed to encourage and facilitate the development of or conversion to an emergency shelter. Those standards may include:

- The maximum number of beds or persons permitted to be served nightly by the facility.
- Off-street parking based upon demonstrated need, provided that the standards do not require
 more parking for emergency shelters than for other residential or commercial uses within the
 same zone.
- The size and location of exterior and interior on-site waiting and client intake areas.
- The provision of on-site management.
- The proximity to other emergency shelters provided that emergency shelters are not required to be more than 30 feet apart.
- The length of stay.
- Lighting.
- Security during hours that the emergency shelter is in operation.

The City had included **Program 15** to establish development and managerial standards and to amend the definition of emergency shelter to include other interim interventions, including but not limited to, navigation centers, bridge housing, and respite or recuperative care.

As shown in **Table 1L-21**, emergency shelters are permitted by-right in the ML, CS, CC, and CN zones. Mixed use development is permitted by-right in the CS, CC, and CN zones, and conditionally permitted in the ML zone, ensuring that emergency shelters can be integrated into current and future residential and commercial areas, thus facilitating proximity to the same resources as all residents of Reedley. This is in compliance with the requirements of AB 2339.

According to the Reedley Police Department, there are 38 homeless individuals living in, or near the edges of, the city. In compliance with Government Code Section 65583(a)(4)(I), there is ample land area to accommodate one or more facilities with 38 beds and 200 square feet per bed. A single facility with 38 beds could be accommodated in a building of approximately 7,600 square feet. In the ML, CS, CC, or CN zones, a facility this size could be constructed on a 0.25-acre lot while meeting development standards **Table 1L-22** shows a selection of vacant of parcels of at least 0.25 acres that are zoned CS, CC, and CN, and provides a description of the location's suitability for development as an emergency shelter. This list is not exhaustive; there are currently 26 vacant parcels in these zones totaling 27.52 acres, others of which may also be suitable for an emergency site. The example parcels listed below total 3.71 acres, which is sufficient to meet the City's need for emergency shelter development.

Table 1L-22 Potential Emergency Shelter Sites, Reedley

APN	Size	Zoning	Appropriateness for Emergency Shelter
36820101	0.26	CS	Within one block of existing residential uses. Two blocks from a supermarket. In close proximity to employment opportunities. Less than 0.5 miles from Washington Elementary School and a preschool.
37009105	0.52	CC	Less than 0.5 miles from Lincoln Elementary School, a medical center, and Walgreens, as well as employment centers. Just over 0.5 miles to Reedley City Community Center.
37005049	1.8	CN	Adjacent to existing residential uses. Just over 0.5 miles to a Fresno County Head Start and Jefferson Elementary School. In close proximity to industrial employment opportunities. One block from a mini mart.
37024050	0.52	CS	Approximately 0.5 miles to a Fresno County Head Start and Jefferson Elementary School. In close proximity to industrial employment opportunities. Less than 0.25 miles from a minimart.
37010042	0.62	СС	In close proximity to employment centers and existing residential uses. Less than 0.25 mile to a Fresno County Social Services office and a grocery store. Less than 1 mile to Lincoln Elementary School.
Total	3.71		

Source: City of Reedley, 2023.

Low Barrier Navigation Centers

Government Code section 65662 requires that low-barrier navigation centers be developed as a use by right in zones where mixed-uses are allowed or in nonresidential zones that permit multifamily housing. For a navigation center to be considered "low barrier," its operation should incorporate best practices to reduce barriers to entry, which may include, but are not limited to:

- Permitting the presence of partners if it is not a population-specific site, such as for survivors of domestic violence or sexual assault, women, or youth
- Permitting pets
- Ability to store possessions
- Providing privacy, such as private rooms or partitions around beds in a dormitory setting or in larger rooms with multiple beds

Program 15 has been included to comply with State law.

Transitional and Supportive Housing

The City permits transitional and supportive housing in all zones allowing single-family residential uses (including nonresidential zones that permit single-family residential uses). Further, the City permits supportive housing in all zones where multifamily housing is permitted, in the same manner as similar uses, including nonresidential zones that permit multifamily housing. As part of **Program 15**, to comply with AB 2162, the City will amend its code to permit supportive housing by-right in the UR, CA-O, CN, CC, CS, and ML zones. Additionally, it will amend its code to consider transitional and supportive housing a residential use of property subject only to those restrictions that apply to other residential dwellings of the same type in the same zone. The City will permit transitional and supportive housing in this manner and compliance with AB 2162 until **Program 15** is implemented. The municipal code defines "transitional housing" as:

Rental housing operated under program requirements that call for the termination of assistance and recirculation of the assisted unit to another eligible program recipient at some predetermined future point which shall be no less than six (6) months. Transitional housing units are residential uses allowed in all zones that allow residential uses, subject only to those requirements and restrictions that apply to other residential uses of the same type in the same zone.

Furthermore, "supportive housing" is defined as:

Housing, with no limit on length of stay, that is occupied by the target population, linked to on site or off site services that assist 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. Supportive housing units are residential uses allowed in all zones that allow residential uses, subject only to those requirements and restrictions that apply to other residential uses of the same type in the same zone.

Single-Room Occupancy Units

Extremely low-income households typically comprise persons with special housing needs, including but not limited to persons experiencing homelessness or near homelessness, persons with substance abuse problems, and farmworkers. The Zoning Ordinance permits single-room occupancy units by right in the RM-2, PO, and CS zones.

Group Homes and Residential Care Facilities

The Zoning Ordinance permits group housing for six or fewer persons by right in all zones that allow single family uses (i.e., the R-E, R-1, RM-2, RM-3, and PO zones). The City also allows group housing for seven or more persons as a conditionally permitted use in the RE, R-1, RM-2, and RM-3 zoned, and removed a requirement that they be limited to occupancy in a single family home. **Program 15** has been included to allow group homes for seven or more persons in all zones that allow single-family uses by right in the same manner, in compliance with the State definition of family. The City does not have separation or site planning requirements for group homes and residential care facilities that differ from other residential uses.

Accessory Dwelling Units

An accessory dwelling unit is defined in Section 18.20B.030 of the Zoning Code as "an attached or detached residential dwelling unit that provides complete independent living facilities for one (1) or more persons. It includes permanent provisions for living, sleeping, eating, cooking, and sanitation on the same parcel as the single-family dwelling is situated." ADUs can include efficiency units, as defined in the Health and Safety Code Section 17958.1 and are permitted by right in all zones allowing single family residential uses. The City does not charge impact fees for ADUs under 750 square feet. The City applies state law and refers to HCD's Handbook when reviewing ADU applications since the 2018 ADU ordinance is out of compliance until the City implements **Program 15**.

Conclusion

The City provides zoning for a variety of housing types; however, the Zoning Ordinance needs to be amended to fully comply with employee housing, residential care facilities, ADUs, low barrier navigation centers, and standards for emergency shelters.

Recommended Action

The Housing Element includes **Program 15** to amend the Zoning Ordinance to address the development standards and barriers to special-needs housing:

- Permit employee housing compliant with the State Employee Housing Act. (Health and Safety Code Sections 17021.5 and 17021.6)
- Require local governments to treat group homes and residential care facilities with six or fewer residents no differently than other by-right single-family housing uses. (Health and Safety Code Sections 1267.8 and 1566.3)
- Allow ADUs in all zones that allow both single family and multifamily residential uses, in compliance with Government Code Section 65852.2(a)(1).
- Permit the development of Low-Barrier Navigation Centers (LBNC) in compliance with Government Code Section 65662, to allow LBNCs by right in zones where mixed-uses are allowed or in nonresidential zones that permit multifamily housing.
- Apply managerial standards pursuant to Government Code Section 65583(a)(4)(A).

On- and Off-Site Improvement Standards

Analysis

Requirements for on- or off-site improvements are regulated by Title 11 (Subdivision Regulations). The City requires storm drainage facilities to be provided pursuant to the City's Storm Drain Master Plan. Water and Sewer lines (Title 8; Public Utilities) must be connected to the City's main line for every lot; where lines are in streets or alleys, laterals for lots will be extended to the right-of-way lines, with the subdivider providing related parts. Fire hydrants are to be provided as necessary for adequate fire protection.

Easements are to be provided by the developer and dedicated to the City for overhead and underground utilities, including but not limited to, electrical, communication, sewer, water or gas lines, or drainage facilities. The subdivider is also responsible for related appurtenances and improvements necessary for connection of all utilities to each lot.

Local residential streets include a 60-foot right-of-way, with a paving width of 40 feet, 175 feet radius of curvature, and two 4-foot-wide sidewalks, except on specific routes where street widths and sidewalks must be wider.

Site improvements necessary to facilitate the production of housing vary greatly. Some housing developments can connect to existing infrastructure facilities, while greenfield developments are required to construct all the infrastructure necessary to support its development. While land costs are lower in greenfield areas these areas typically require a greater amount of investment in backbone infrastructure and site improvements. For example, in undeveloped areas on-site improvement costs averaged approximately \$25.1 million for both the Willow Grove and Frankwood Commons. In infill areas, site improvement costs are typically lower since the infrastructure is already in place. However, if required, the cost to repair aging infrastructure can be high and must be borne by the developer, as opposed to financing districts that can distribute the costs more evenly. For the 48 unit- Gurdian Village and Almond Grove, two infill projects in the City of Reedley, on-site improvements costs averaged approximately \$12.6 million while offsite improvement costs averaged \$700,000. As shown in Table 1L-23, on-site improvements costs for single-family development are higher in undeveloped areas and infill on and off-site improvements are less costly. To support the production of housing, the City has included **Program 5: Water and Wastewater Capacity**, to ensure adequate water capacity for new residential projects.

Table 1L-23 Example Projects Improvement Costs, Reedley

Туре	Project Name	Number of units	On-Site Improvements	Off-Site Improvements	Year of Project
Infill MF	Guardian Village	48	\$15,500,000	\$70,200	2023
Undeveloped Area MF	Willow Grove	80 (small mixed- use component)	\$22,382,972	\$1,556,884	2023
Infill SF	Almond Grove	45	\$9,891,461	\$1,331,210	2019-2021
Undeveloped Area SF	i Lommons aka San I 98		\$27,822,02	\$2,027,353	2020-2023
	Average		\$18,899,114	\$1,246,411	-
	Average (Infill)		\$12,695,731	\$700,705	-
	Average (Underdevelop	ped)	\$25,102,498	\$1,792,118	

Source: City of Reedley, 2023.

Conclusion

The City's standards for residential subdivisions are comparable to most urban jurisdictional standards and do not exceed those reasonably expected to provide safety for pedestrians and cyclists, adequate guest parking, and efficient traffic flow.

Recommended Action

None required.

Fees and Exactions

Analysis

New housing typically requires payment of the following fees to the City: building, plan check, general plan assessment, impact fees, various permits, and a variety of other handling and service charges. In addition, residential projects may incur the cost of preparing environmental documents, soils reports, traffic studies, and filing fees for tentative and final maps. Consistent with Government Code Section 65940.1(a)(1) related to transparency requirements, City fees are available on the City's website: https://reedley.ca.gov/download/citywide-master-fee-schedule/ Table 1L-24 shows a list of planning and development fees.

Table 1L- 24 Processing and Permitting Fees, Reedley

Planning and Application Fees	Fee Amount
Administrative Review	\$100.00
Annexations	\$6,250.00
Appeals	\$500.00
Building Permit Issuance Fee	29.00
Building Permit Fee	Based on Valuation ¹
Building Plan Check	65% of Building Permit Fee
Change of Zone	\$5,000.00
Conditional Use Permit (CUP)	
New development project	\$3,900.00
Amendment	\$1,500.00
Environmental Review:	
Categorical Exemption	\$250.00
Initial Study	\$800,00
Environmental Impact Report	Cost + 10%
Negative Declaration	\$1,200.00
Mitigated Negative Declaration	Cost + 10%
Mitigation Monitoring Fee	Cost + 10%
General Plan/Specific Plan Amendment:	\$5,500.00
Land Division Applications:	
Tentative Parcel Map	\$2,250
Tentative Subdivision Map	\$6,500+35/lot
Vesting Tentative Parcel Map	\$7,500+75/lot
Vesting Tentative Subdivision Map	\$7,500+115/lot
Final Map	1000 + Cost

Planning and Application Fees	Fee Amount	
Exceptions	\$775.00	
Lot Line Adjustment	\$800.00 + Cost	
Voluntary Parcel Merger	\$800.00 + Cost	
General Plan Amendment	\$5,500.00	
Planned Unit Development	\$3,900	
Public Convenience or Necessity Findings	\$1,200.00	
Site Plan Review:		
New	\$3,400.00	
Amendment	\$1,000.00	
Accessory Dwelling Unit	\$400.00	
Time Extension	\$300.00	
Variance	\$1,000.00	
Improvement Plan Check	\$650.00 + Cost	
Construction Inspection of Public Improvements	4.5% of first \$10,000; plus 3% of amount over \$10,000; Minimum \$52.00	

Source: City of Reedley 2022.

- Valuation \$1 to \$500: \$23.50
- Valuation \$501 to \$2,000: \$23.50 for the first \$500; plus \$3.05 for each additional \$100 or fraction thereof, up to and including \$2,000
- Valuation \$2,001 to \$25,000: \$69.25 for the first \$2,000; plus \$14 for each additional \$1,000 or fraction thereof, up to and including \$25,000
- Valuation \$25,001 to \$50,000: \$391.75 for the first \$40,000; plus \$10.10 for each additional \$1,000 or fraction thereof, up to and including \$50,000
- Valuation \$50,001 to \$100,000: \$643.75 for the first \$100,000; plus \$7.00 for each additional \$1,000 or fraction thereof, up to and including \$100,000
- Valuation \$100,001 to \$500,000: \$993.75 for the first \$500,000; plus \$5.60 for each additional \$1,000 or fraction thereof, up to and including \$500,000
- Valuation \$500,001 to \$1,000,000: \$3,233.75 for the first \$1,000,000; plus \$4.75 for each additional \$1,000 or fraction thereof, up to and including \$1,000,000
- Valuation \$1,000,001 and over: \$5,608.75 for the first \$5,000,000; plus \$3.65 for each additional \$1,000 or fraction thereof

¹ Building permit fees for new construction in Reedley are as follows:

Table 1L-25 presents development impact fees that apply to residential development in Reedley.

Table 1L-25 Development Impact Fees, Reedley

Fee Type	Single-Family	Multi-Family	Accessory Dwelling Unit
City of Reedley Water ¹	\$1,254 - \$2,508 ²	\$1,203- \$2,4072	\$313.53 - \$627.06
Transportation ¹	$2,776.29 - 5,552.58^2$	$1,514.34 - 3,028.68^2$	\$696.60 - \$1,388.15
Police ¹	\$61.52 - \$123.01 ²	\$59.08 – 118.15 ²	\$15.38 - \$30.75
Fire ¹	\$539.30 -1,078.59 ²	\$518.01 - \$1,036.01 ²	\$134.82 - \$269.65
Kings Canyon Unified School District	\$4.79 per square foot	\$4.79 per square foot	\$4.79 per square foot
Storm Drainage ¹	\$1,722.38 - \$3,444.75 ²	\$1,102.32-\$2,204.642	\$430.59 - \$861.19
General Government ¹	$$35.38 - 70.79^2	$$33.98 - 68.00^{2}$	\$8.84 - \$17.70
Parks and Recreation Facilities ¹	\$3,335.91 – \$6,671.77	\$3,204.23 - \$6,408.41	\$833.98 - \$1,667.94
Wastewater Facilities ¹	\$1,196.61 - \$2,393.21	\$1,148.74 - \$2,297.28	\$299.15 - \$598.30
Indirect Review Source	\$562.00	\$562.00	\$562.00
Regional Transportation Mitigation ²	\$2,118.00	\$1,642.00	N/A

Source: City of Reedley, 2022.

Table 1L-26 shows the sum of development impact fees in Reedley for single and multifamily development. Development fees total range from \$10,921 to \$18,397 for single family estate homes, up to \$17,569 for a multifamily unit, and up to \$5,191 for ADUs. The City does not charge impact fees for ADUs under 750 square feet. Fees for single-family homes at higher densities have reduced fees.

¹ Fees vary by area of the city: Expansion Center, City Center, and Infill Area.

² Reduced fees are available for affordable units. Affordable single-family units have a fee of \$1,059 and affordable multifamily units have a fee of \$821.

Table 1L- 26 Development Impact Fee Sums by Area, Reedley

Land Has Type	Fee Amount per Unit				
Land Use Type	Expansion Area	City Center	Infill Area		
Single Family Residential	\$18,397.59	\$10,921.70	\$16,384.21		
Multifamily Residential	\$17,569.27	\$8,784.66	\$13,176.96		
Accessory Dwelling Unit	\$5,191	\$2,733	\$4,096		

Source: City of Reedley 2022.

Table 1L-27 shows permit fees for single family and multifamily prototype developments. Construction costs for a prototypical single-family home are approximately \$144 per square foot. This is based on costs calculated for a 2,000-square-foot, wood-framed, single-story, four-cornered home of good quality construction and including a two-car garage and forced air heating/cooling in Reedley. Estimated total construction costs for such a home are \$289,732. Costs for prototypical multifamily construction are approximately \$137 per square foot, based on costs calculated for a 2-story building in Reedley with 20 units and an average unit size of 1,000 square feet. The multifamily calculation is for a wood or light steel frame structure, including forced air heating and cooling and constructed of good quality materials. The estimated total construction costs for each multifamily unit are \$131,207, with a total construction cost for the building of \$2,572,848. These construction costs, for both single-family and multifamily units, include labor, materials, and equipment but do not include the costs of buying land or off-street parking.⁴

¹ The City 's current Impact Fee Reduction Incentive Program (adopted by Resolution 2022-060) provides that the fees charged to permits in the Infill Area (primarily the city limits) would be reduced by 25 percent from the fees charged in all areas outside the defined Infill Area (the Expansion Area). The Fee Reduction incentive also provides for a 50 percent reduction in fees within the City Center area. Therefore, the proposed City Center fees are 50 percent of the Expansion Area fees.

² School impact fees are based on a 2,000-square-foot single-family home and a 20-unit multifamily project with 1,000-square-foot units.

⁴ 2022 National Building Cost Manual and 2022 93654 zip code modifiers, Craftsman Book Company.

Table 1L-27 Prototypical Construction Fees

	Expansion Area		City Center		Infill Area	
Fee Description	Single- Family	Multifamily	Single- Family	Multifamily	Single- Family	Multifamily
Building Permit Fee	\$993.75	\$567.51	\$993.75	\$567.51	\$993.75	\$567.51
Plan Check Fees	\$645.94	\$368.88	\$645.94	\$368.88	\$645.94	\$368.88
Impact Fees	\$18,397.59	\$17,569.27	\$10,921.70	\$8,784.66	\$16,384.21	\$13,176.96
Total Development Fees (per unit)	\$20,037.28	\$18,505.66	\$12,561.39	\$9,721.05	\$18,023.90	\$14,113.35
Typical Building Construction Costs (per unit)	\$289,732.00	\$131,207.00	\$289,732.00	\$131,207.00	\$289,732.00	\$131,207.00
Total Housing Cost (not including land costs)	\$309,769.28	\$149,712.66	\$302,293.39	\$140,928.05	\$307,755.90	\$145,320.35
Fees as a % of Total Housing Costs	6.5%	12.4%	4.2%	6.9%	5.9%	9.7%

Source: City of Reedley 2022.

Conclusion

Development impact fees are an estimated be 4.2 to 6.5 percent of the total development costs for single family development and 6.9 to 12.4 percent for multifamily development. While the City's development impact fees are well below the statewide average and generally constitute a relatively minor proportion of total development cost, the higher rate of fees for multifamily housing may pose a constraint on development of this housing type.

Recommended Action

The City has included **Program 17** to meet with multifamily developers to assess the impact of development fees on multifamily construction and, if deemed a constraint, to reduce fees.

Processing and Permit Procedures

Analysis

After the City approves a project, such as at a Planning Commission or City Council hearing, it becomes the applicant's responsibility to initiate the steps to secure building permits and construct the project. These steps include obtaining state or regional permits and paying fees as outlined in a project's conditions of approval. Other necessary actions include:

- Completing construction drawings
- Recording subdivision (final) maps (applies to ownership projects)

- Retaining contractors
- Obtaining utility approvals, required easements, and rights of entry

Table 1L-28 summarizes the typical length of time between a project's approval and building permit issuance.

Table 1L- 28 Typical Processing Procedures, Reedley

Process	Single-Family Unit	Subdivision	Multifamily
Step 1: Site Plan Review - Planning Approval	6 weeks	10 weeks	6-8 weeks
Step 2A: Building Permit – Single	2-3 weeks	1-2 weeks	2-3 weeks
Step 2B: Building Permit – Complex	4 weeks	4 weeks	5 weeks
Step 3: Approved Final Grading Plan	N/A	2 weeks	1-3 weeks
Estimated Total Processing Time	6 - 8 weeks	12 – 18 weeks	9 – 16 weeks

Source: City of Reedley 2022.

Note: Each step of the process can be concurrent to reduce the time for applicants, with the exception of Planning Approval. This estimate does not account for the time between Planning Approval and building permit submittal. The final length of time between a project's planning Approval and building permit submittal is determined by the applicant. However, typical time between building permit application and building permit issuance is less than a month for single-family units to up to approximately four months for subdivisions. If corrections are necessary after the City's initial review, the applicant will need to complete the corrections, and the timing for addressing corrections varies.

Reedley does not have a design review process, but does have a site plan review process for single-family and multi-family projects with no subdivision of land. This process does not require public hearings for projects that comply with development standards. Therefore, typical housing projects for single-family and multifamily housing meeting zoning and General Plan are approved ministerially, unless a request for a Planned Unit Development (PUD) is proposed. Generally, a typical single-family building permit is processed in approximately 2 to 3 weeks, and 4 weeks for a complex project (see **Table 1L-28**), and a typical multifamily project (planning approval and building permits) is processed in approximately 2 to 3.5 months, and neither require public hearings.

Unlike typical single-family and multifamily projects, subdivision maps require a public hearing with Planning Commission. The typical processing time from when an application is deemed complete to hearing is 10 weeks. Similarly, PUD multi-family projects require a public hearing (Planning Commission). For these, the typical processing time from applications deemed complete to public hearing is 8 weeks.

Multifamily Review Process

Multifamily and mixed-use projects are required to go through the site plan review process to evaluate the project's consistency with the City of Reedley General Plan and Municipal Code. The process is administrative and does not require a public hearing before a decision-making body. During the site plan review process, Planning staff routes the project to other departments and agencies for conditions or approval, confirms that zoning property development standards are met, and makes findings in accordance with RMC Section 10-19-7.

In taking action on a proposed site plan, the Planning Director shall make all of the following findings:

- All applicable provisions of Section 10-19-17 are complied with.
- The following are so arranged that traffic congestion is avoided and pedestrian and vehicular safety and welfare are protected and there will not be an adverse effect on surrounding property:
- o Facilities and improvements.
- o Vehicular ingress, egress and internal circulation.
- Setbacks.
- Height of buildings.
- Location of services.
- o Walls.
- Landscaping.
- Drainage of site.
- Proposed lighting is so arranged as to deflect the light away from adjoining properties.
- Proposed signs will comply with all of the applicable provisions of chapter 14 of this title.
- That adequate provision is made to reduce adverse or potentially adverse environmental impacts to acceptable levels.

In making the above findings, the Planning Director shall determine that approvals will be consistent with established legislative policies relating to traffic safety, street dedications and street improvements, and environmental quality. Following an approval from the Planning Director, an applicant may submit for any entitlements, if necessary, or for a building permit.

Single Family Review Process

For single family residential developments consistent with existing zoning, a Tentative Subdivision Map (TSM) is processed and approved by Planning Commission, Final Map and Subdivision Improvement Agreement are processed and approved by City Council, and building permits for housing are approved by Building Division staff. During the TSM process, Planning staff routes the project to other departments and agencies for conditions of approval, confirms that lot area requirements are met, and the Planning Commission makes approval findings. A tentative map may only be disapproved in one of the following cases:

- That the proposed tentative map is not consistent with the general plan or any applicable specific plan as specified in Government Code section 65451.
- That the design or improvement of the proposed subdivision is not consistent with the general plan or any applicable specific plan.
- That the site of the proposed subdivision is not physically suitable for the type of development.
- That the site of the proposed subdivision is not physically suitable for the proposed density of development.
- That the design of the proposed subdivision is, or the proposed improvements are likely to, cause substantial environmental damage or substantially and avoidably injure fish or wildlife or their habitat.
- That the design of the proposed subdivision or type of improvements is likely to cause serious public health problems.
- That the design of the proposed subdivision or the type of improvements will conflict with easements, acquired by the public at large, for access through or use of property within the proposed subdivision; provided that the commission may approve the tentative map if it finds that alternate easements for access or use will be provided, and that these will be substantially equivalent to ones previously acquired by the public. This subsection shall apply only to easements of record or to easements established by judgment of a court of competent jurisdiction, and no authority is hereby granted to the commission to determine that the public at large has acquired easements for access through or use of property within the proposed subdivision.
- That the tentative map fails to meet or perform any of the requirements or conditions imposed by the subdivision map act or this title; provided that such disapproval shall be accompanied by a finding identifying the requirements or conditions which have not been met or performed.

Subdivision or Parcel Map Review Process

Subdivision is initiated via the tentative subdivision map or tentative parcel map process. Tentative maps are processed and approved within 75 days. Pursuant to Ord. 2000-05, 4-25-2000, prior to submitting an

application, developers have the option of scheduling a pre-application meeting. The developer is informed of the City's policies, fees, infrastructure, and development standards and may make recommendations on design. The tentative map application is then filed, and the City determines completeness of the application within 30 days. It is then circulated as required, and a public notice is posted for a Planning Commission hearing. Approval or conditional approval expires after 24 months, with extensions of the map possible.

Improvement plans are submitted by the subdivider to the City Engineer and must include all public utilities, electric, gas, telephone, and cable television. Improvement plans are acted on within 60 days unless revised submittals are received. Public improvements are to be completed prior to approval of the final map or the applicant enters into a subdivision improvement agreement with the City as a part of conditional approval.

Conditional Use Permit Process and Variance

The Planning Commission may grant an application for a conditional use permit as the use permit was applied for or in modified form if, on the basis of the application and the evidence submitted, the commission makes all the following findings:.

- A. That there are circumstances or conditions applicable to the land, structure or use which makes the granting of a use permit necessary for the preservation and enjoyment of a substantial property right.
- B. That the proposed location of the conditional use is in accordance with the objectives of this title and the purposes of the district in which the site is located.
- C. That the proposed use will comply with each of the applicable provisions of this title.

The application is acted on within an average of 45 days by the Planning Commission at a public hearing informing the applicant of stated conditions, dedications, or requirements of approval found to be reasonably necessary to protect the public health, safety, and general welfare. The conditional use permit application becomes final 10 days following the date of resolution by the Commission.

In certain instances, the objectives of the Reedley Municipal Code may be achieved by the development of planned units which do not conform in all respects with the land use pattern designated on the zone plan or the district regulations prescribed by the Zoning Ordinance. A planned unit development may include a combination of different dwelling types and/or a variety of land uses which are made to complement each other and harmonize with existing and proposed land uses in the vicinity, by design. In order to provide locations for such well planned developments, the Planning Commission is empowered to grant use permits for planned unit developments, subject to appeal to the City Council, provided that such developments comply with the regulations prescribed in Title 10, Chapter 11.

The Board of Zoning Adjustment may consider and grant variances "only when, because of special circumstances applicable to the property, including size, shape, topography, location or surroundings, the strict application of this title deprives such property of privileges enjoyed by other property in the vicinity and under identical zoning classification." Its decisions are subject to appeal to the City Council.

Senate Bill 330

Senate Bill (SB) 330, the Housing Crisis Act of 2019, established specific requirements and limitations on development application procedures. The bill requires that housing developments for which a preliminary application is submitted that complies with applicable general plan and zoning standards are subject only to the development standards and fees that were applicable at the time of submittal. This applies to all projects unless the project square footage or unit count changes by more than 20 percent after the preliminary application is submitted. The developer must submit a full application for the development project within 180 days of submitting the preliminary application.

The City of Reedley 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 established an application process related to SB 330; the application is available on the Community Development Department website.

Senate Bill 35

Currently the City of Reedley does not have a process for SB 35. The City has included **Program 18** to establish a process that specifies the SB 35 streamlining approval process and standards for eligible projects. The established procedure will aid in minimizing the review time required for development processes and, in turn, reduce costs to developers, which may increase the housing production in the City.

Conclusion

The approval process has been streamlined for all project types and has not been found to constrain the development of housing.

Recommended Action

The City has included **Program 18** to establish an application process related to SB 35.

Building Codes and Enforcement

Analysis

The City has adopted the 2022 California Building Code. The Reedley Fire Department is responsible for code enforcement and employs one full-time Life Safety/Code officer.

Conclusion

The City has not made any local amendments to the code that would impact the cost of housing.

Recommended Action

None required.

Constraints on Housing for Persons with Disabilities

Analysis

California Building Code

As previously stated, Reedley has adopted the 2022 California Building Code. The code provides the minimum standards for accessibility. There are no amendments to the building codes that would diminish the ability to accommodate persons with disabilities or effect accessibility. Per the 2022 California Building Code, the City allows residential retrofitting to increase the suitability of homes for persons with disabilities in compliance with accessibility requirements.

Definition of Family

The municipal code defines "family" as:

One person living alone or two or more persons living together in a dwelling unit with common access to, and common use of, all living, kitchen, and eating areas within the dwelling unit.

This definition complies with State law.

Zoning and Land Use Policies

The City Zoning Ordinance allows for several types of facilities that provide services and conditions for the elderly and those with disabilities, including community care facilities, nursing homes, and rest homes. However, as previously stated, the Zoning Ordinance does not fully comply with State law requirements for group housing. While the Zoning Ordinance permits group housing for six or fewer persons by right in the R-E and R-1 zones, the Zoning Ordinance does not permit them in all zones that allow single family uses (i.e., the RM-2, RM-3, and PO zones). Health and Safety Code Sections 1267.8, 1566.3, 1568.08 require local governments to treat licensed group homes and residential care facilities with six or fewer residents no differently than other by-right single-family housing uses. "Six or fewer persons" does not include the operator, the operator's family, or persons employed as staff. Local agencies must allow these licensed, residential-care facilities in any area zoned for residential use, and cannot require licensed, residential-care facilities for six residents or less to obtain conditional use permits or variances that are not required of other family dwellings. The City has included **Program 15** to allow residential care facilities for seven or more residents as a single-family use in compliance with the definition of family.

Separation Requirements. The City does not currently have separation requirements for residential care facilities

Site Planning Requirements. The City does not currently have site requirements for residential care facilities

Reasonable Accommodation

The City does not have a reasonable accommodation ordinance. The City provides a process under which residents can apply for a variance that will allow them to alter their homes with ramps or other atypical features. The City does not currently have site or separation requirements for residential care facilities.

Conclusion

Amendments to the City's Zoning Ordinance are required to address reasonable accommodation procedures.

Recommended Action

The Housing Element includes **Program 16** to amend the Zoning Ordinance to adopt reasonable accommodation procedures.

At-Risk Analysis

As required by California Government Code Section 65583, the Housing Element must analyze the extent to which below-market rate units are at risk of converting to market-rate housing. If there are at-risk units, the element should include programs to encourage preservation of these units or to replace any that are converted to market rate. The units to be considered are any units that were constructed using federal assistance programs, state or local mortgage revenue bonds, redevelopment tax increments, in-lieu fees or an inclusionary housing ordinance, or density bonuses. Housing is considered to be "at risk" if it is eligible to be converted to non-low-income housing due to: (1) the termination of a rental subsidy contract, (2) mortgage prepayment, or (3) the expiration of affordability restrictions. The time period applicable in making this determination is the 10-year period following the last mandated update of the Housing Element, which, in the case of all Fresno County jurisdictions, is December 31, 2023. There are currently 63 units at risk of converting to market rate in the next 10 years (each project at risk is denoted in **bold** in **Table 1L-29**).

Table 1L- 29 Assisted Housing Developments, Reedley

Name	Address	Target Population	Funding Source	# of Units	# of Affordable Units	Affordable Units Expiration	Risk Level
Kings River Commons	2020 E. Dinuba Avenue	Non-targeted	LIHTC	60	59	2068	Low
Mountain View Apartments	128 S. Haney Avenue	Non-targeted	HUD	38	38	2039	Moderate
Springfield Manor Apartments	1463 E. Springfield Avenue	Non- targeted	USDA	40	40	20061	High
Riverland Apartments	990 East Springfield Avenue	Large Family	LIHTC, USDA	76	75	2068	Low
Reedley Elderly Senior Apartments	172 South East	Senior	USDA	23	23	20072	High
Sunset Terrace	629 East Springfield Avenue	Non-targeted	Fresno Housing Authority	20	20	In perpetuity	Low
Sunset Terrace II	806 Lingo Avenue	Non-targeted	Fresno Housing Authority	20	20	In perpetuity	Low
Reedley Family Apartments Phase 1	1110 South I Street	Non-targeted	LIHTC	48	47	2068	Low
Paseo 55	1233 G Street	Non-targeted	LIHTC; HUD	55	54	2069	Low
Reedley Village	1112 South I Street	Non-targeted	LIHTC	32	31	2074	Low
Guardian Village	601 E. 11 th Street	Family/ Farmworker	N/A	48	48	Under construction	Low
Total				460	455		
Total At Risk					63		

Source: California Housing Partnership, 2022.

As previously described in Chapter 2, Housing Needs Assessment, there are three methods to preserve the at-risk units: acquisition and rehabilitation, replacement, or a rent subsidy.

¹ Units reserved for families. Owner can apply to prepay USDA loan at any time. USDA estimates the development will exit the program in 2036.Listed in the USDA Rural Housing program in USDA's online database of multifamily properties.

² Units reserved for seniors. LIHTC regulatory agreement expired in 2016; however, the property has an existing USDA loan that matures in June 2037. The project also receives USDA rental assistance. Owner can apply to prepay USDA loan at any time. Self-Help Enterprise holds a purchase option for this property which they intend to execute once they secure a TCAC award. Application to TCAC likely in 2024. If/when the project receives Tax Credits, it will take out new USDA debt to maintain the rental assistance.

Acquisition and Preservation

The factors that must be used to determine the cost of preserving low-income housing include property acquisition, rehabilitation, and financing. Actual acquisition costs depend on several variables, such as condition, size, location, existing financing, and availability of financing (governmental and market). Looking at multifamily buildings throughout the 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. To preserve the 23-unit Reedley Elderly complex, the cost would be likely be between \$1,677,068 and \$6,900,000. For the 40-unit Springfield Manor Apartments, the cost would likely be between \$2,916,640 and \$12,000,000. Additionally, if the property needs significant rehabilitation, or financing is difficult to obtain, it is important to consider these factors in the cost analysis.

Replacement

To replace the 63 at-risk units, at \$108,475 per unit not including the costs of buying land or off-street parking, it would cost an estimated \$6.8 million.

Rent Subsidy

Housing affordability can also be preserved by seeking alternative means of subsidizing rents, such as the Tenant Protection Vouchers which is a subset of the housing choice voucher (HCV) program. Under HCVs, the United States Department of Housing and Urban Development (HUD) pays the difference between what tenants can pay (defined as 30 percent of household income) and what HUD estimates as the fairmarket rent on the unit. The Fresno Housing Authority administers approximately 1,311 active HCVs, 51 of which are to residents currently residing in Reedley. Based on HUD's 2023 fair-market rents, the subsidy needed to preserve a unit at an affordable rent for a four-person, extremely low-income household would be an estimated \$694 per month for a two-bedroom unit, or \$8,328 per year. For 30 years, the subsidy would be approximately \$249,840, and subsidizing all 63 units at-risk of converting to market rate at extremely low-income rents would cost approximately \$15.7 million.

The subsidy needed to preserve a unit at an affordable rent for very low-income households would be an estimated \$284 per month, or \$3,408 per year. For 30 years, the subsidy would be about \$102,240 for a four-person household. Subsidizing all 63 units at a very low-income rent for 30 years would cost an estimated \$6.4 million.

In Fresno County, a four-person, low-income household's ability to pay exceeds the fair-market rent for a two-bedroom unit.

Conclusion

There are 63 affordable units at risk of conversion to market-rate during the planning period, placing a possible constraint on affordable housing for lower-income households.

Recommended Action

The City has included **Program 11** to maintain contact with owners of at-risk units as the use restriction expiration dates approach and to contact CHPC annually to inquire about the status of Reedley Elderly Senior Apartments and Springfield Manor to determine whether either property has any changes in ownership or expressed interest in changing ownership status or interest in prepaying their USDA loan. If any potential threat to affordability is identified, the City will contact the property owners immediately and take action, as described in **Program 11**. The City will communicate to the owners the importance of the units to the supply of affordable housing in the county as well as its desire to preserve the units as affordable.

APPENDIX 1L: CITY OF REEDLEY

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SECTION 1L-5: REVIEW OF PAST ACCOMPLISHMENTS

Per California Government Code Section 65588, "Each local government shall review its housing element as frequently as appropriate to evaluate all of the following: (1) The appropriateness of the housing goals, objectives, and policies in contributing to the attainment of the state housing goal. (2) The effectiveness of the housing element in attainment of the community's housing goals and objectives. (3) The progress of the city, county, or city and county in implementation of the housing element. (4) The effectiveness of the housing element goals, policies, and related actions to meet the community's needs, pursuant to paragraph (7) of subdivision (a) of Section 65583."

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 December 31, 2015 to December 31, 2023. The City of Reedley was assigned a RHNA of 1,311 units, divided into four income categories:

- Very Low-Income (less than 50 percent of the Area Median Income): 393
- Low-Income (50 to 80 percent of the Area Median Income): 204
- Moderate-Income (80 to 120 percent of the Area Median Income): 161
- Above Moderate-Income (greater than 120 percent of the Area Median Income): 553

Table 1L-30 summarizes the City's accomplishments in meeting the RHNA during the previous RHNA projection period.

Table 1L- 30 Units Permitted During 2015-2023 RHNA Projection Period, Reedley

Income Category	2015 – 2023 RHNA	2015-2022 Building Permits Issued	Percentage of RHNA Accomplished
Very Low	393	79	20.1%
Low	204	43	21.1%
Moderate	161	103	64.0%
Above Moderate	553	208	37.6%
Total	1,311	433	33.0%

Source: City of Reedley, 2023

Efforts to Address Special Housing Needs

California Government Code Section 65588 requires that local governments review the effectiveness of the housing element goals, policies, and related actions to meet the community's special housing needs. As shown in the Review of Previous 2015-2023 Housing Element Programs matrix (**Table 1L-31**), the City worked diligently to continuously promote housing for special-needs groups in a variety of ways. Some of the accomplishments include:

- The City continued to offer incentives such as minor deviations, density bonuses, and a streamlined process to housing developers to help facilitate the development of farmworker and lower-income housing.
- The City promotes the activities of Fair Housing Council of Central California (FHCCC). FHCC provided several services including mediation, counseling, advocacy, research, and fair housing training and workshops for residents as well as housing providers. Promotional materials are available in the cities counter.
- The City wrote letters of support to securing funding for farmworker housing and affordable housing projects.
- The City offered incentives to encourage construction of affordable and special needs housing, including development impact fee deferrals.
- The City permitted the Self-Help Enterprises Reed-Aspen subdivision and Reedley Family Apartments Phase II.
- The City reduced barriers to development of ADUs to support construction of more affordable housing options integrated within single-family neighborhoods by reducing ADU fees for infill and city center neighborhoods.
- The City referred 40 households to Fresno County rehabilitation programs to improve housing conditions for lower-income residents.
- The City referred an average of eight residents annually to the Fresno Housing Authority to access their range of programs.

Progress Towards Meeting Housing Element Programs

Table 1L-31 summarizes the programs from the 2015-2023 Housing Element. To the degree that such programs are recommended to be continued in the current Housing Element, these programs are reorganized and presented in Section 2L-1, Action Plan.

Table 1L-31 Review of Previous Housing Element Programs

Program	Implementation Status	Continue, Modify, or Delete
 Program 1: Regional Collaboration on Housing Opportunities Timeframe and Objectives: The County of Fresno Public Works and Planning Department, with assistance from the Fresno COG, will take the lead in coordinating Committee meetings. Continue to participate in the Countywide Housing Element Technical Committee to collaborate on housing program implementation and regional issues including, disadvantaged unincorporated communities (SB 244), infrastructure challenges, farmworker housing, homelessness, and fair housing. The Countywide Housing Element Technical Committee will meet at least biannually to evaluate successes in implementation of programs and to identify gaps and additional needs. The Committee will meet annually with the California Department of Housing and Community Development (HCD) to discuss funding opportunities and challenges in implementation of programs and seek technical assistance from HCD and other State agencies in the implementation of housing programs and the pursuit of grant funding. The Committee will meet periodically with Fair Housing of Central California to discuss fair housing issues and opportunities for education. The Committee will advocate on behalf of the Fresno region for more grant funding for affordable housing and infrastructure improvements. 	Throughout the planning period, the City of Reedley continued to attend quarterly meetings with the 13 participating jurisdictions in Fresno COG (Committee) to develop committee goals to address housing issues. Additionally, in this collaboration, the committee members, including City of Reedley, evaluated successes in the implementation of Housing Element programs in their jurisdiction to provide insights and guidance to other committee members as they implemented their programs. Reedley shared successes including the projects Self-Help Enterprises Reed-Aspen subdivision and Reedley Family Apartments Phase II. The Committee also identified gaps and additional needs, including a lack of grant funding for housing and competition between jurisdictions, shortage of staff time and resources, and a need for universal informational materials about funding resources available to all jurisdictions, from a variety of potential funding sources. In response to identified needs, the Committee supported the County's effort in 2023 to conduct a feasibility study on a regional housing trust for affordable housing. Another gap that was identified by the Committee was accurate, current information on proper locations for the	Modify. New Program 1.

Program	Implementation Status	Continue, Modify, or Delete
 Continue to seek partnerships with other jurisdictions in the region and other agencies (such as the Housing Authority), housing developers, community stakeholders, and agricultural employers/employees to explore viable options for increasing the availability of farmworker housing in suitable locations in the region. Develop a directory of services and resources for lower-income households available in the region, and review and update it annually. Make the directory available on City/County websites and at City/County offices. 	supported the County's effort to create a survey in 2021 to determine farmers' need for housing on their farmland. In 2022, the survey was distributed to determine the housing needs of farmworkers.	
Program 2: Review Annexation Standards in Memorandum of Understanding	The MOU between the City of Reedley and the County of Fresno was last updated in mid-2017	Modify. New Program 2.
The County of Fresno and the cities within the County shall work together to review and revise, as deemed appropriate by all parties, the standards for annexation contained in the Memorandum of Understanding between the County and the cities.	to streamline the annexation process by reducing the percentage of imminent development required for annexations from 50 percent to 25 percent and to allow annexations without any development if the annexation is necessary to accommodate the City's RHNA. MOU was also updated in 2021 to add new growth areas: one surrounding the Reedley Airport and another just north of town (a.k.a. north side of South Ave) to accommodate residential and commercial development. As seen in Section 1L-2: Sites Inventory, the City can meet its RHNA without any additional annexations. All sites are in current city boundaries.	
Program 3: Provision of Adequate Sites Timeframe and Objectives: Maintain and annually update the inventory of residential land resources for internal purposes;	The City maintained the inventory of land, made it available upon request, and ensured sufficient land to accommodate the City's RHNA throughout the planning period.	Modify, combine with Program 4. New Program 4.

Program	Implementation Status	Continue, Modify, or Delete
 Provide the inventory on the City website and make copies available upon request; Monitor development and other changes in the inventory to ensure the City has remaining capacity consistent with its share of the regional housing need; and Actively participate in the development of the next RHNA Plan to better ensure that the allocations are reflective of the regional and local 		
 land use goals and policies. Program 4: Monitoring of Residential Capacity (No Net Loss) Timeframe and Objectives: Develop and implement a formal evaluation procedure pursuant to Government Code Section 65863 by 2017. Monitor and report through the HCD annual report process. If rezoning/upzoning is required to replenish the sites inventory for meeting the RHNA shortfall, the sites shall be large enough to accommodate at least 16 units per site at a minimum density of 20 units per acre and shall be rezoned within two years. 	Through the annual progress report process, the City evaluated progress to meet the RHNA; monitored ongoing capacity; and provided updates to city council, HCD, and OPR.	Modify, combine with Program 3. New Program 4.
 Program 5: Water and Wastewater Service Timeframe and Objectives: Continue to monitor water and wastewater capacity and make improvements, as appropriate and feasible, to better serve existing development and strive to accommodate the RHNA. Establish procedures by the end of 2016 for granting priority water and sewer service to developments with lower-income units in compliance with California Government Code Section 65589.7. 	The CDBG project list continued to be assessed to ensure funds were maximized and projects on the list were prioritized. The City annually updated its capital improvement plan as part of the city's budget and referenced the integrated master plan for water, wastewater, and storm drain systems for future development projects. The procedures were established in 2021.	Modify. New Program 5.

Program	Implementation Status	Continue, Modify, or Delete
Maximize the use of the City's CDBG allocated share to address deficient or non-existent infrastructure in support of housing. Funds will be leveraged for area-wide improvements for housing construction, rehabilitation, and preservation. Program 6. Affordable Housing Insentings		Modific
Program 6: Affordable Housing Incentives Timeframe and Objectives: Continue to seek partnerships and meet on an as-needed basis with other agencies (such as the Housing Authority), housing developers, community stakeholders, and employers to discuss and pursue viable opportunities for providing affordable housing, with an emphasis on housing opportunities for very low and extremely low income households, as well as special needs populations, such as the elderly, disabled (including developmentally disabled), farmworkers, the homeless, and those at risk of becoming homeless. Continue to offer, fee reductions, and deferral of development impact fee payments to facilitate affordable housing development and special needs projects, particularly those located on infill sites. Continue to promote the State density bonus and provide streamlined processing to facilitate affordable housing development and provide for additional flexibility for affordable housing and special needs housing through the minor deviation process. The City will promote this program by publicizing the incentives on the City website and by conducting pre-application consultation with developers regarding incentives available. Examples of flexible development standards include: reduced parking requirements; reduced requirements for curb, gutter and sidewalk construction; common trenching for utilities; and reduced water and wastewater connection fees. Continue to streamline the environmental review process for housing developments to the extent possible, using available State categorical	As of June 2022, the City offered a DIF deferral program that included a 25 percent DIF reduction for infill projects within current city limits and a 50 percent reduction for infill projects in the city center. On May 26, 2015, the city council approved a development impact fees deferral program. The provision allows for an applicant to pay a nonrefundable payment of 20 percent against the applicable development impacts fees at the time of building permit application. The remaining fee balance (80 percent) would be due prior to final inspection. Additionally, City staff continued to streamline the environmental review process to the extent possible, primarily for infill projects. During the 5th housing element cycle, the City wrote letters of support for many recent affordable housing projects and offered various incentives in discussions with housing developers, such as DIF deferrals and the City Center DIF Reduction. In June 2022, the City updated incentives (i.e., DIF infill rate and deferral program) on the City website. Projects such as the Self-Help Enterprises Reed-Aspen subdivision and Reedley Family Apartments	Modify. New Program 7.

Program	Implementation Status	Continue, Modify, or Delete
 exemptions and Federal categorical exclusions, when applicable. Monitor the State Department of Housing and Community Development's website annually for Notices of Funding Ability (NOFA) and, where appropriate, prepare or support applications for funding for affordable housing for lower income households (including extremely low-income households), such as seniors, disabled (including persons with developmental disabilities), the homeless, and those at risk of homelessness. Expand the City's affordable housing inventory by 275 units over the next eight years – 50 extremely low-income, 75 very low-income, and 150 low-income units. 	family and multifamily development during this calendar year. The City continued to work with housing developers (Fresno Housing Authority, Self-Help Homes, private developers, etc.) to expand affordable housing opportunities. The City submitted and received SB 2 and LEAP funding to complete a comprehensive zoning code update to streamline housing production. The City did not issue any NOFAs. In 2019, the City provided a Letter of Support for Self-Help Enterprises' Reedley Affordable Housing Project (67 single family units) for Fresno County HOME CHDO funding. From support letter: "Safe, affordable housing is a critical need in our community. Additionally, the City's previous experience with Self-Help Enterprises on development of a similar project in Reedley was positive and we welcome this proposed new development." In 2021, the City provided a Letter of Support for Self-Help Enterprises' Guardian Village Affordable Rental Housing Project and application for Fresno County HOME Program funding (48 multifamily units).	

Program	Implementation Status	Continue, Modify, or Delete
 Program 7: Farmworker Housing Timeframe and Objectives: Continue to support and encourage other agencies and housing developers, such as the Fresno Housing Authority and Self-Help Enterprises, in the application of funds for farmworker housing, including State HCD and USDA Rural Development loans and grants and other funding sources that may become available. Continue to offer incentives such as density bonus, streamlined processing, and the minor deviation process to facilitate the development of farmworker housing. Annually monitor the status of farmworker housing as part of the City's annual report to HCD on Housing Element progress and evaluate if City efforts are effective in facilitating the provision of farmworker housing. If appropriate, make necessary changes to enhance opportunities and incentives for farmworker housing development. 	Incentives continue to be available to developers for farmworker housing, including minor deviations and density bonuses. The City continued to refer housing agencies and developers to vacant residential land (single family and multiple family) in the City and worked with them through the entitlement and building permit process. The City provided letters of support for future farmworker housing projects and permitted farmworker housing in certain zoning districts in Reedley. As of 2020, no applications for farm labor housing have been submitted. In 2018, the City provided a Letter of Support provided for TCAC Application for 32 multifamily units at Reedley Village. The City was in support of the project "because of a need for more multi-family housing that provides a quality place to live." The City permits agricultural uses in the Resource Conservation and Open Space (RCO) District and Urban Reserve (UR) District. The City amended the Zoning Ordinance in July 2015 to permit employee housing for six or fewer employees in all zones allowing single family units and permit farm employee housing of up to 12 units or 36 beds in the RCO and UR zones.	Modify. New Program 8.
Program 8: Preserving Assisted Housing	The City continued to refer housing agencies and	Modify.
 Timeframe and Objectives: The City shall continue to work with, and monitor local activities of the Fresno Housing Authority, in Reedley. 	developers to vacant residential land for single family and multiple family housing in the City and worked with them through the entitlement/building permit process.	New Program 11.

Program	Implementation Status	Continue, Modify, or Delete
 Monitor 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, and immediately upon notification of intent to terminate affordability restrictions, take the following actions: Identify non-profit organizations as potential purchasers/managers of at-risk housing units. 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. Ensure the tenants are properly noticed and informed of their rights and eligibility to obtain special Section 8 vouchers reserved for tenants of converted HUD properties. 	The City also periodically monitored Notices of Intent and Plans of Action filed by property owners. During the 5th housing element cycle, one apartment complex lost its Section 8 certificates in 2014 but continued as a HUD-assisted low-income project and is not at risk of converting. To ensure tenants are properly notified of their rights and eligibility, City staff refers them to the local housing agency or HUD.	
Program 9: Encourage and Facilitate Accessory Units (Second Units) Timeframe and Objectives: By 2018, consider fee reductions for second units. By 2019, implement a public education program advertising the opportunity for second units through the City website and at the planning counter.	The municipal code text amendments to further accommodate accessory dwelling units (ADUs), such as reduced DIFs, were approved by council in September 2018. An information packet is available to the public on the City website reflecting ADUs' recent text amendments and updated fees. As part of a master fee schedule update (2018), ADU fees were further reduced. In June 2022, DIFs for ADUs created through new construction of 750 SF or more were divided into three categories: Expansion area (fees increased from 2018), infill area (fees decreased from 2018), and city center (fees decreased from 2018). The City does not charge impact fees for ADUs under 750 square feet. The	Modify. New Program 12.

Program	Implementation Status	Continue, Modify, or Delete
	City applies state law and refers to HCD's ADU Handbook when reviewing ADU applications since the 2018 ADU ordinance is out of compliance. The zoning ordinance update is anticipated in	
	2023 using SB 2 and LEAP funding to reflect State laws pertaining to ADUs.	
 Program 10: Zoning Code Amendments Timeframe and Objectives: Review and adopt appropriate parking standards for group homes by the end of 2016. Amend Zoning Code by 2018 to address density bonus and reasonable accommodation. Annually review the effectiveness and appropriateness of the Zoning 	The municipal code text amendments to further accommodate ADUs were approved by council in September 2018. The city council also adopted reduced DIFs for ADUs in September of 2018 and updated multiple zoning codes in 2018. The zoning ordinance update is anticipated in 2023 using SB 2 and LEAP funding to reflect	Modify. New Program 15.
 Annually review the effectiveness and appropriateness of the Zoning Ordinance and process any necessary amendments to remove or mitigate potential constraints to the development of housing. 	State laws pertaining to ADUs. Added farmworker housing to Zoning Ordinance (definition and added use to land use matrix).	
 Program 11: Lot Consolidation and Lot Splits Timeframe and Objectives: Assist interested developers/property owners in identifying opportunities for lot consolidation or lot splitting. Process requests for lot consolidation and lot splitting concurrent with other development reviews. Offer incentives to developers to promote parcel consolidation, such as priority permit processing and deferred development fees. Encourage the use of master plans/specific plans to provide a cohesive development strategy for large lots. 	Master plan/specific plan goals and policies were incorporated into the 2030 General Plan update. Property disposition was discussed early and often during preliminary meetings with developers and property owners. The City continued to offer concurrent entitlement processing, including lot mergers or splits and DIF deferral. Past projects have involved concurrent entitlement processing, including lot mergers or lot splits. These past practices have been successful for developers and will continue for the foreseeable future.	Delete.

Program	Implementation Status	Continue, Modify, or Delete
 Annually monitor the effectiveness of this program as part of the City's annual report to HCD on Housing Element progress and, if appropriate, make necessary changes to enhance opportunities and incentives for lot consolidations and lot splits. 	The City offered incentives to developers to promote parcel consolidation, including concurrent processing of entitlement applications and lot mergers or splits, DIF deferrals, and deferred lot-line adjustments and/or lot mergers until occupancy of buildings over the property lines to be removed/adjusted, allowing the paperwork to be completed while construction is underway.	
	No property owners or developers requested lot consolidations or lot splits; however, the City was ready to facilitate these continuously during the planning period.	
Program 12: Monitoring of Planning and Development Fees	The City's master fee schedule is reviewed on an	Modify.
Timeframe and Objectives:	annual basis and DIFs are reviewed every 5	New Program 17.
 Continue to monitor the various fees charged by the City to ensure they do not unduly constrain housing development. As appropriate, consider incentives such as deferred or reduced fees to facilitate affordable housing development. 	years to analyze the nexus for each fee. As of 2020, the City offers a 25 percent DIF reduction for infill projects and a 50 percent DIF reduction for infill projects in the city center. Additionally, the City offers a DIF deferral program. The City continued to provide fee reductions in fees to affordable housing developments.	
Program 13: Fresno County Housing Assistance Rehabilitation Program (HARP)	To ensure residents have access to home rehabilitation resources, staff refers interested	Modify. New Program 20.
Timeframe and Objectives: Promote available housing rehabilitation resources on City website and public counters.	parties to the Fresno County program by providing a flyer at the City's front counter, phone number and/ or location of Fresno County's office, and a link to the County's	Tron Trogram 20.
	affordable housing programs on the City's	

Program	Implementation Status	Continue, Modify, or Delete
 Refer interested households to County program with the goal of 	website. Forty households were referred to	
assisting four low-income households during the planning period.	Fresno County programs during the planning	
	period. Housing rehabilitation resources	
	continued to be available at public counters at	
	city hall and the City website. Staff turnover and	
	limited funding for staff time have precluded the	
	ability to consistently track and report program	
	outcomes. The City will continue to seek ways to	
	implement programs efficiently and create	
	systems for record keeping.	
Program 14: Fresno County Rental Rehabilitation Program (RRP)	To ensure residents have access to home	Modify.
Timeframe and Objectives:	rehabilitation resources, staff refers interested	New Program 21.
 Promote available housing rehabilitation resources on City website and 	parties to the Fresno County program by	
public counters.	providing a flyer at the City's front counter,	
1	phone number and/ or location of Fresno	
 Refer interested property owners to County program. 	County's office, and a link to the County's	
	affordable housing programs on the City's	
	website. Forty households were referred to	
	Fresno County programs during the planning	
	period. Housing rehabilitation resources	
	continued to be available at public counters at	
	city hall and the City website. Staff turnover and	
	limited funding for staff time have precluded the	
	ability to consistently track and report program	
	outcomes. The City will continue to seek ways to	
	implement programs efficiently and create	
	systems for record keeping.	26.40
Program 15: Code Enforcement	To ensure residents have access to home	Modify.
Timeframe and Objectives:	rehabilitation resources, staff referred 40	New Program 22.
	interested parties to the Fresno County program	
	or refers them to City staff to go over code	

Program	Implementation Status	Continue, Modify, or Delete
 Continue to use code enforcement and substandard abatement processes to bring substandard housing units and residential properties into compliance with city codes. Refer income-eligible households to County housing rehabilitation programs for assistance in making the code corrections. 	corrections. A comprehensive zoning ordinance update was completed in 2016 to more adequately address public nuisances and property maintenance standards within city limits. To ensure enforcement issues are addressed, weekly communication with City staff is conducted. Staff turnover and limited funding for staff time have precluded the ability to consistently track and report program outcomes. The City will continue to seek ways to implement programs efficiently and create systems for record keeping.	
Program 16: Fresno County Homebuyer Assistance Program (HAP) Timeframe and Objectives: Promote available homebuyer resources on City website and public counters. Refer interested households to County program with the goal of assisting four households.	To ensure residents have access to homebuyer resources, staff referred 40 interested parties to Fresno County programs by providing a flyer, phone number, or location of Fresno County's office. Homebuyer resources continued to be available at public counters at city hall and the City website.	Modify, combine with Program 17. New Program 23.
Program 17: First-Time Homebuyer Resources Timeframe and Objectives: Promote available homebuyer resources on City website and public counters in 2016. Annually review funding resources available at the state and federal levels and pursue as appropriate to provide homebuyer assistance.	To ensure residents have access to homebuyer resources, the City continued to provide access to a number of homebuyer assistance programs offered by the California Housing Finance Agenda (CalHFA), including Mortgage Credit Certificate (MCC), CalPLUS Conventional Program (includes deferred-payment junior loan), and CalHFA Conventional Program. The City also provides brochures from Self-Help Enterprises about home ownership programs at the City's front counter. Staff turnover and limited funding for staff time have precluded the	Modify, combine with Program 16. New Program 23.

Program	Implementation Status	Continue, Modify, or Delete
	ability to consistently track and report program outcomes. The City will continue to seek ways to implement programs efficiently and create systems for record keeping.	
Program 18: Energy Conservation Timeframe and Objectives:	The City continued to ensure energy conservation resources were available. This included ensuring brochures were available at	Modify. New Program 24.
 Consider incentives to promote green building techniques and features in 2017, and as appropriate adopt incentives by 2018. Continue to promote HERO and YGREEN program by providing links on the City website and making brochures available at City counters. 	City counters and on the City website. The City is currently working to establish a highefficiency washing machine/dryer rebate program for Reedley residents. As of 2020, the	
 Continue to promote and support Pacific Gas and Electric Company programs that provide energy efficiency rebates for qualifying energy- efficient upgrades by providing a link on the City website and making brochures available at City counters. 	City is in compliance with Section 65850.5 of the California Government Code, which requires expedited plan review of small residential rooftop solar energy systems.	
 Expedite review and approval of alternative energy devices (e.g., solar panels). 		
■ The City shall encourage and make available the HERO Program on the City website and public counters in 2016.		
Program 19: Housing Choice Vouchers	The City planned to work with the Housing	Modify.
Timeframe and Objectives:	Authority to obtain HCV flyers and brochures	New Program 25.
 Provide information on the HCV program on City website and public counters in 2016. 	for distribution at city hall and on the City website. To ensure residents have access to home rehabilitation resources, staff referred an	
 Refer interested households to the Fresno Housing Authority and encourage landlords to register their properties with the Housing Authority for accepting HCVs. 	average of eight interested parties to the Fresno County program annually by providing a flyer, phone number, or location of Fresno County's office. Housing rehabilitation resources continued to available at public counters at city hall and online on the City website. Staff	

Program	Implementation Status	Continue, Modify, or Delete
Work with the Housing Authority to disseminate information on incentives for participating in the HCV program throughout city neighborhoods with varying income levels to promote housing opportunities for all city residents.	turnover and limited funding for staff time have precluded the ability to consistently track and report program outcomes. The City will continue to seek ways to implement programs efficiently and create systems for record keeping.	
 Program 20: Fair Housing Timeframe and Objectives: Participate in the Fresno Urban County's efforts in updating the Analysis of Impediments to Fair Housing Choice required by the CDBG program. Work collaboratively with other jurisdictions in the region to provide education to lenders, real estate professionals, and the community at large. 	During the planning period, fair housing referrals ranged from 5 to 10 per year. To increase City knowledge on available fair housing resource, the City researched regional educational efforts and attended workshops and informational meetings. Fair housing brochures continued to be available at City counters and on the City's website.	Modify. New Programs 26 and 27.
 Actively advertise fair housing resources at the public counter, community service agencies, public libraries, and City website. Refer fair housing complaints to HUD, DEFH, Fair Housing Council of Central California, and other housing agencies, as appropriate. 		

APPENDIX 1L: CITY OF REEDLEY

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SECTION 1L-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."

The diligent effort required means that local jurisdictions must do more than issue the customary public notices and conduct standard public hearings prior to adopting a Housing Element. State law requires cities and counties to 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. Spanish-language materials were available, and Spanish translation was made available by request.

To meet the requirements of State law, the City of Reedley completed the public 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:

- Regional Project Website
- Stakeholder Consultations and Focus Groups
- Study Sessions with Planning Commissions, City Councils, and the County Board of Supervisors
- Community Workshops
- Community Survey

Regional efforts included three sets of community workshops, consultations, and a community survey, all of which are discussed in detail in Appendix 1: Regional Housing Element Public Outreach.

Joint Planning Commission/City Council Study Session

On October 11, 2022, a Joint Planning Commission/City Council Study Session was held to introduce the 2023-2031 Housing Element update and to review new State laws. The public was also invited to attend and participate in this event. Staff presented an overview of the Housing Element update process and required contents of the element, discussed early strategies and possible sites to meet the City's RHNA, reviewed new state laws, and solicited feedback from the City Council, Planning Commission, and community members on these strategies and other housing needs in Reedley. City Council expressed concerns about the tensions between State and local land use control, the impacts of State laws at the local level, and about cities' abilities to implement the new laws. No comments or questions were received during the study session.

Community Workshop

A community workshop was held from 6:00 to 7:30 pm on September 20, 2022, at the Reedley Community Center. In order to invite the community to the event, the following outreach efforts were conducted:

- City staff gave out flyers in English and Spanish with tote bags and frisbees to 20 to 25 attendees at their Street Eats event.
- City staff dropped off flyers at the Riverland Apartments, an affordable housing project, and emailed current and previous affordable housing applicants.
- Flyers, snacks, and waters were distributed to attendees of a Zumba class at the Reedley Community Center.
- Flyers in English and Spanish were distributed through the Fresno COG email list and to the list of regional stakeholders and CBOs.
- Flyers were sent out through the Fresno Housing Authority to residents in affordable housing units.
- Eventbrite registration pages were created in both English and Spanish, along with a Facebook event. City staff and council members shared the Facebook event.
- The Eventbrite and Facebook pages advertised that Spanish language interpretation would be provided, as well as refreshments and activities for kids.

Materials were made available in Spanish and English.

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 Reedley. They were also given information about current housing conditions in the region and in Reedley and were invited to participate in a discussion about local housing needs. The discussion was prompted by the following questions:

- What do you think are the most critical housing issues in your community?
- What do you think are the housing types most needed in the community?
- When assessing new housing development that might be built in the next 8 to 10 years, what should be the community's most important consideration?
- Is there anything else that you can share regarding additional housing opportunities in the community?
- Any suggestions for soliciting additional Housing Element feedback?

Four community members attended. Attendees expressed a strong desire for affordable single-family homes to help create more opportunities for homeownership, but also felt that both single-family and multifamily affordable housing is needed. Attendees felt that housing types suitable for both families and students at

Reedley College were needed in the city. Some attendees expressed that it seems like affordable housing developers are held to higher standards than developers of market-rate housing. There was also concern about small-lot sizes in Reedley as they relate to the potential for ADU development, as the attendees didn't feel that most lots would allow for the construction of an ADU. Parking for ADUs was also an item of concern. The ongoing drought and limits to water access were identified by community members as a point of concern, though they noted that Reedley is in a better position than other local cities due to their proximity to the Kings River. The attendees also expressed a desire to preserve land for agriculture, citing the pressure on small-scale farmers to sell their land for development.

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 Reedley and throughout the Fresno County area. Summaries of interviews from stakeholders working in Reedley or the County as a whole are included below.

BIA of Fresno/Madera Counties

The President of the Building Industry Association of Fresno/Madera Counties (BIA), Mike Prandini, was interviewed in November 2022. The BIA is an industry organization that represents builders, developers, subcontractors, and affiliated businesses in the residential, commercial, and industrial building industry throughout the region.

The current shortage of housing has created demand, which can be a positive for BIA's members. Most jurisdictions have sufficient available land to build new housing. Kingsburg was identified as an outlier in this, as they have a growth limitation ordinance, so the two builders that work in the area have been able to work but at a slower pace. The statewide move to require all-electric utilities rather than gas is a concern. For market-rate housing, the State's vehicle miles traveled (VMT) regulations are a large barrier, as 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. He expressed concern that the State assigned the RHNA without this in mind. There may not be enough water access to support the housing development that the State is looking to see.

In his experience, single-family homes are in 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 cost around \$400,000 per unit to build.

Condo-style projects are also a possibility, but in his experience, they don't tend to be successful in this region. To keep prices within reach of local residents, recent projects have needed to be built at higher densities. A typical project is between 8 and 15 units per acre on small lots, with single-family homes built as two-story structures in order to reach 1,200 or 1,300 square feet. Developers need to build higher-density projects to spread out the cost of infrastructure among a larger number of units. Demand isn't as high in smaller communities as it is in the cities of Fresno and Clovis. These cities have better access to jobs, education, and medical centers. VMT mitigation costs increase in communities that are far from these economic centers, so it's less of an issue in closer communities like Sanger, Reedley, Kingsburg, Fowler, and Kerman. Reedley is too far away from the economic center of the region, which causes challenges. Many residents of Mendota and San Joaquin have incomes that are too low to afford development at its current costs. He indicated that more downpayment assistance and maintenance programs are needed throughout the region. Fresno Housing Authority has some, but they're limited.

Fair Housing of Central California

A representative from Fair Housing of Central California (FHCCC) was interviewed on September 27, 2022. The organization works to eliminate housing discrimination and expand housing opportunities to all persons. The FHCCC receives fair housing complaints and tracks these complaints by location, zip code, gender, race or ethnicity, and type of complaint. The most common fair housing issue that clients report is discrimination related to disability or race. She expressed concern that fair housing practices are not really embraced by local government, and that cities should avoid promoting the development of new housing in neighborhoods where segregation is deliberately continued by landlords and real estate agents. Her clients prefer decent, affordable, and accessible housing, but as the cost of purchasing a home increases, opportunities decline. She feels there is adequate rental housing in the community, including for seniors and persons with disabilities, but affordability and accessibility remain barriers.

Fresno Madera Continuum of Care

As a representative for the Fresno Madera Continuum of Care (CoC), Laura Moreno was interviewed in October, 2022. Ms. Moreno is a program manager for Fresno County's Department of Social Services (DSS). The CoC does not provide direct services, but instead is a collaborative of agencies that work together to provide homeless services. At present, there is insufficient low-income housing for those who are homeless. Many people in the region are on a fixed income, including disability or social security, and cannot afford housing.

Law Office of Patience Milrod

Fresno-area civil rights attorney Patience Milrod was interviewed on October 31, 2022. While Ms. Milrod supports the continued attention to inclusionary housing, she has concerns about the passive language of "facilitate" and "encourage" that have been common in past Housing Elements. She identified code enforcement as a strategy for improving housing quality that could be strengthened. At present, rents are increasing while the quality of housing is decreasing, and there isn't a lot of energy locally to correct that

imbalance. This particularly hurts lower-income households. 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. She would like to see that as a specific goal. The biggest barrier to finding affordable, decent housing in the region that she identified was that lower-cost housing tends to also be low quality or ill maintained. However, she cautioned that the supply problem won't be solved with suburban or exurban single-family dwelling units. There's also local disinclination to build lower-income housing in areas of opportunity. She suggested that cities should ask for affordability covenants in perpetuity and highlighted the land trust model as a way to enable that.

Central Valley Urban Institute

On September 7, 2022, Eric Payne, executive director of the Central Valley Urban Institute (CVUI), was interviewed. The CVUI is an advocacy organization working throughout the Fresno area. He indicated that there may be opportunities 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. However, he expressed concerns about high building costs, lack of financing, and poor leadership in the area. Community members would like to see intergenerational housing, middle-income housing, and "missing-middle" sized housing as well as housing to end homelessness, particularly among college-aged youth. At present, he does not believe that there are adequate 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 a lack of investment in programs that serve low to moderate-income communities.

Resources for Independence Central Valley

On November 1, 2022, a representative from the organization Resources for Independence Central Valley was interviewed. 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. Access to Section 8 can be a challenge, as the waiting list can be four or five years long. Additionally, rental housing can require incomes of two to three times the rent, which can be a barrier to some who need to access rental housing. For those who may be able to access housing, some landlords levy additional fees during the application process that can present a prohibitive cost. Credit checks are becoming a barrier for residents to get into housing. Community members with disabilities can experience additional challenges trying to find homes that have necessary accessibility features. Homeowners with disabilities end up needing to make expensive home improvements in order to make their homes accessible for themselves. For renters, these improvements may be more challenging to implement, and those who use service or support animals may experience discrimination against pets. There isn't enough higher-density housing, housing near transit or major transportation corridors, or housing in good repair.

Llaves de tu Casa Iniciativa

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 initiative is a financial education program open to all County of Fresno residents but with a focus on increasing Latino homeownership rates. Eight initiative members represented organizations and companies, including Envision Fresno (Mirna Garcia), Self Help Enterprises (Rick Gonzales, Alicia Bohigian), CORE Home Loans (Pablo Estrada), Union Bank (Reyes Ruiz), the California Association of Realtors (Sabrina Brown), and the National Association of Hispanic Realtors (Aldiva Rubalcava, Lucy Sandoval). The group collectively serves Fresno County, and members also serve other counties in the Central Valley.

The opportunities for future housing in the region that the initiative members identified included LTDC'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 aren't able to afford the housing available. In addition to a lack of multifamily rental housing, there aren't many 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.

Self Help Enterprises has partnered with the City of Clovis on their recent accessory dwelling unit program and has partnered with Salt + Light to develop tiny homes for transitional housing.

Fresno Housing Authority

Two representatives from the Fresno Housing Authority, Doreen Eley and Michael Duarte, were interviewed on January 11, 2023. The Fresno Housing Authority currently has housing projects in every jurisdiction participating in the Multi-Jurisdictional Housing Element except for Coalinga. The City of Fresno has a separate Housing Authority.

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.

In rural and unincorporated communities, lack of water and sewer capacity are major concerns. The Housing Authority can't build housing in areas with no services.

For local developers, state funding and streamlining programs trigger skilled, trained, and prevailing wage requirements, which can be a barrier. Entitlement processing timelines are a barrier to development for the Housing Authority. The representatives gave the example of a recent project in San Joaquin where streamlined initiatives were used, but the project still took a year to finish the project review process. Many communities don't have much staff capacity and have part-time consultants to complete the work.

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. There is a countywide Department of Behavioral Health, but no offices within smaller cities. The representatives gave the example of a Homekey project in Huron that the Housing Authority wanted to assist with, but there were no service providers available to serve the project.

While there is a lot of interest within the community for homeownership opportunities, more funding is available for multifamily rental projects. The Housing Authority is more focused on rental projects and arriving at deeper affordability levels.

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. The representatives mentioned that they are trying to balance this need by also working to improve the lower-resource areas where folks are already living along with disadvantaged communities like Del Ray and Lenar.

The COVID-19 pandemic brought challenges for many residents of Housing Authority projects. There were increases in domestic violence, and it was challenging for property managers to enforce rules.

Public Comments

The City solicited ongoing public comments during the drafting of the Housing Element and incorporated public comments received during that process. All comments received were considered and used to inform the sites analysis and assessment of fair housing issues, and goals, policies, and actions were included and/or revised to incorporate the feedback received.

No additional public comments were received during the 30-day public review period; however, the City will continue to seek public input throughout the process.

Noticing of Study Sessions and Community Workshops

Notice of the Joint Study Session was made available as part of the City's standard meeting notice process for City Council and Planning Commission meetings.

The Community Workshop was advertised to members of the public through multiple information channels. Flyers in English and Spanish were distributed at local events in the community as well as at the Community Center. Current residents of the Riverland Apartments and prior applicants to that building received information through flyers and email, and residents in Fresno Housing Authority units received information about the workshops by email. The availability of Spanish translation was noted in outreach materials.

Noticing of the Draft Housing Element

Per California Government Code Section 65585, the draft Housing Element was made available for public comment for 30 days, from April 18 to May 18, 2023. No public comment was received. 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 and stakeholders who had participated in the process or expressed interest in participating.

Public Comments

The City solicited ongoing public comment during the drafting of the Housing Element. Following submittal of the draft to HCD, the City received public comment from the Carpenters Local 701 regarding the labor shortage and requested that policies be included to help address this issue. In response, the Multijurisdictional Housing Element, Regional Section has included Policy 1.10 to encourage developers and contractors to evaluate hiring local labor, hiring from, or contributing to apprenticeship programs, increasing resources for labor compliance and prevailing living wages.

Self-Help Enterprises (SHE) also provided a comment letter to several Fresno COG jurisdictions with numerous broadly applicable recommendations. The City of Reedley has taken these recommendations into careful consideration. SHE urges its service area members, including the City of Reedley, to prioritize high-potential sites that unlock access to opportunity and not just basic shelter. As shown in **Figure 1L-2 Local TCAC/HCD Opportunity Areas**, sites counted towards each RHNA income category are distributed across the City, with many low- and moderate-income sites in the high and moderate resource areas. SHE encourages the City to streamline approvals and create financial incentives (including fee waivers or deferrals) for 100 percent affordable housing. Per **Programs 7, 8, 10, 12, 16, and 18**, the City will continue to use streamlined approvals and offer incentives (including fee waivers or deferrals) to encourage affordable housing, housing for farmworkers and persons with disabilities, and ADUs. SHE encourages jurisdictions to add a program to revise their zoning ordinance to add a manufactured home on a permanent foundation to be allowed in all zones that allow single-family residences, which Reedley already permits. SHE calls for a collaborative effort and the City of Reedley stands ready to partner with SHE as opportunities arise.

Ongoing Opportunities for Public Participation

Through its Housing Element Programs, the City has committed to creating ongoing opportunities for stakeholders and partner organizations to provide input on housing needs and to collect information that will inform program development on an ongoing basis. These include the following:

- In **Program 1**, the City will continue to collaborate with neighboring communities as part of the Housing Element Technical Committee, which will meet at least biannually to evaluate successes in implementation of programs and to identify gaps and additional needs. The City will also continue to seek partnerships with other jurisdictions in the region and other agencies, housing developers, community stakeholders, and agricultural employers/employees to explore viable options for increasing the availability of farmworker housing in suitable locations in the region.
- In **Program 3**, the City will collaborate with neighboring cities, the County, and other agencies that work on homelessness issues not only to complete the Point-in-Time Count every other year, but to develop programs aimed at providing homeless shelters and related services.
- In **Program 7**, the City will continue to seek partnerships and meet at least every other year with other agencies (such as the Housing Authority), housing developers, community stakeholders, and employers to discuss and pursue viable opportunities for providing affordable housing, with an emphasis on housing opportunities for very low- and extremely low-income households, as well as special-needs populations, such as seniors, persons with disabilities (including developmental disabilities), farmworkers, female-headed and single-parent households, persons experiencing homelessness, and extremely low-income households. The City will pursue partnerships with the Central Valley Regional Center to promote housing for persons with disabilities.

- In Program 8, the City will provide technical support to housing developers related to farmworker housing development. Additionally, the Code Enforcement Officer in the City's Fire Department will conduct outreach to any housing known to serve farmworkers to review conditions, which will provide an opportunity to collect input from housing providers and/or residents and track conditions in farmworker housing.
- In **Program 9**, the City will annually reach out to affordable housing developers to gather interest and input on how to best implement a farmworker preference program in affordable housing projects and will provide information on available funding opportunities.
- In **Program 17**, the City will meet with multifamily developers at least once to request input regarding constraints associated with fees.
- In **Program 22**, the Fire Department will continue to use proactive code enforcement and substandard abatement processes, including targeted efforts in areas of greater need and areas with farmworker housing, which will allow Code Enforcement officers to not only provide information to community members, but to collect information on housing conditions on an ongoing basis.
- In **Program 26**, the City will work with local fair housing service providers to conduct educational programming to tenants and landlords, which will provide an opportunity to collect information from both groups on current conditions and fair housing issues in the city.
- In **Program 27**, the City will partner with the school district to identify whether housing security is a barrier to student achievement or teacher retention and to identify possible solutions if either are determined to be an issue.
- In **Program 28**, the City will actively recruit residents from areas of concentrated poverty to serve on boards, committees, and task forces as vacancies are available, which will encourage input and representation on housing issues from community members living in areas of high need of investment.

Summary of Public Input Incorporated into the Housing Element

Highlights of public input and the programs that address it are provided in **Table 1L-32**.

Table 1L- 32 Summary of Public Input was Incorporated into the Housing Element

Public Comment	Relevant Program(s)
Special Housing Needs	
During the local and regional community workshops, participants discussed the lack of ADA complaint housing in the City. Participants noted a lack of housing for vulnerable populations, especially seniors and persons with disabilities.	Per Program 10, the City will provide financial support to organizations that serve populations with special housing needs and expand regulatory incentives for the development of units affordable to extremely low-income households and housing for special-needs groups, including persons with disabilities (including developmental disabilities), and individuals and families in need of emergency/transitional housing. Per Program 7, the City will expand affordable housing opportunities, particularly for those with special housing needs by collaborating with other agencies (such as the Housing Authority), housing developers, community stakeholders, and employers; promoting the State density bonus; providing streamlined processing; providing incentives to builders such as fee reductions and deferrals, reduced setbacks, reduced parking requirements, and technical assistance with applications for funding and letters of support. Per Program 16, the City will develop and formalize a general process that a person with physical and developmental disabilities can use to make a reasonable accommodation request and include accessibility considerations in the preparation of the City's capital improvement plan and the allocation of funding for capital improvements in support of housing and residential neighborhoods for persons with physical or
During the regional and local stakeholder consultations, interviewees expressed concern that homelessness is increasing. Concern was also expressed regarding the cultural competency of homeless services. Amongst the Asian/Pacific Islander community, members who are experiencing homelessness prefer to couch surf rather than use formal homeless services.	developmental disabilities. Per Program 3, the City will monitor the demographic composition of the unhoused population to identify needs for targeted resources and determine what efforts to take, such as providing education on financial assistance and programs available.
During the regional stakeholder consultations, interviewees were concerned about the lack of available affordable farmworker housing. The farmworker and farm employer surveys concluded that there was not a significant amount of	Per Program 8, 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. Per Program 8, the City will also continue to offer incentives such as density bonuses, streamlined processing, and the minor deviation process to facilitate development of farmworker housing.
interest in farmworkers living in farm labor housing if developed because farmworkers prefer to live in a home located off-site from the farm where they work. Farmworker employers expressed interest in developing farm labor or work camp only if it was subsidized.	Per Program 9, the City will annually reach out to affordable housing developers to gather interest and input on how to best implement the Farmworker Preference in New Affordable Housing Program and will provide information on available funding. The City will monitor the effectiveness of the preference policy and if it is not found to be effective, will identify and implement other approaches to meeting the need for housing for farmworker households. Including preferences for farmworkers in new affordable housing developments provides an alternative to housing on farms, which addresses the results of the survey.

Public Comment	Relevant Program(s)
Water	
During the both the local and regional community workshops and both the regional and local stakeholder consultations, participants discussed their concern for the City water supply and its' capacity to provide adequate water to the City if housing is developed.	Per Program 5, the City will continue to monitor water and wastewater capacity and apply for funding and make improvements, as appropriate and feasible.
Affordable Housing Development	
During the regional stakeholder consultations, participants discussed the need for affordable housing incentives for developers; especially for special needs groups like farmworkers.	Per Program 7, the City will provide incentives to builders such as fee reductions and deferrals, reduced setbacks, reduced parking requirements, and technical assistance with applications for funding and letters of support to facilitate affordable housing development and special-needs projects, particularly those on infill sites.
	Per Program 8, the City will provide technical support and offer incentives to housing developers, such as the Fresno Housing Availability and Self-Help Enterprises, including HCD (e.g. Joe Serna grant program) and USDA Rural Development loans and grants, other programs administered by California's Office of Migrant Services (OMS), and other funding sources that may become available.
	Per Program 12, the City will identify and implement incentives for construction of ADUs with new development, which may include differing collection times for impact fees for the square footage associated with the ADU.
During regional stakeholder consultations, interviewees were concerned about the high construction costs of developing housing units.	Per Program 7, the City will provide incentives to builders such as fee reductions and deferrals, reduced setbacks, reduced parking requirements, and technical assistance with applications for funding and letters of support to facilitate affordable housing development and special-needs projects, particularly those on infill sites.
During the regional stakeholder consultations, interviewees were concerned about the siting of affordable housing units far from opportunity areas, such as job opportunities, educational resources, and medical resources.	Per Program 9 and 10, the City will encourage housing mobility by facilitating development of lower-income units in higher-opportunity areas, including the Riverbottom neighborhood, the River Ridge neighborhood; and the Reedley Estates, Kingswood Estates, Frankwood Heights, and Hollywood neighborhoods in northern Reedley.
medical resources.	Per Program 12, the City will encourage the construction of ADUs, particularly in predominantly single-family neighborhoods with higher median incomes, such as the Riverbottom neighborhood, to reduce concentrations of lower-income households (e.g., in the City Center East, South Columbia/East Early Avenue, and Duff and Buttonwillow neighborhoods).
	Per Program 27, the City will work to improve access to resources and opportunities citywide with an emphasis on neighborhoods with a concentration of lower-income residents who often face additional barriers in accessing resources. The City will meet with school district representatives to analyze whether housing security poses a barrier to residents, and the City will prioritize projects that facilitate place-based revitalization through the City's Capital Improvement Plan.

Public Comment	Relevant Program(s)
Removal of Governmental Constraints	
During the both the local and regional community workshops, participants discussed the viability of developing ADUs in neighborhoods with small lots and less parking opportunities.	Per Program 15, the City will amend the Zoning Code to be consistent with all State legislation related to ADUs. Additionally, the City will reduce parking standards for multifamily dwellings to mitigate possible constraints on development. Per to Program 12, the City will encourage the construction of ADUs, particularly in predominantly single-family neighborhoods with higher median incomes, such as the Riverbottom neighborhood, where lots are larger and can accommodate more parking and street parking is ample.
During the regional stakeholder consultations, interviewees expressed their desire to see single-family zoning to be upzoned to create more opportunities for the development of multifamily housing in more desirable locations.	Per Program 7, the City will work with developers of multifamily and affordable housing projects on an annual basis to identify site opportunities in higher-resource areas and areas with higher median incomes to reduce concentrations of poverty (e.g., in the City Center East, South Columbia/East Early Avenue, and Duff and Buttonwillow neighborhoods) and improve access to resources.
	Per Program 15, the City will annually review the effectiveness and appropriateness of the Zoning Ordinance and process any necessary amendments to remove or mitigate potential constraints to the development of housing.
Housing Quality and Quantity	
During both the local and regional stakeholder consultations, interviewees were concerned about overcrowding in rental units.	Per Program 14, the City will encourage a variety of housing types to address the housing needs of a variety of household types, sizes, and incomes.
During the regional stakeholder consultations, interviewees said there was a need for rehabilitation of rental units and mobile homes throughout the region.	Per Program 20 and 21, the City will promote available housing rehabilitation resources on the City's website and at public counters, and target in areas of need through the City's Quarterly Newsletter and other outreach methods to assist in reducing displacement risk for residents by improving living conditions and enabling them to stay in their home and community
During both the regional and local community workshops and both the regional and local stakeholder consultations, participants discussed their concern for the lack of a variety housing types in the City that address the differing needs of the City population.	Per to Program 14, the City will encourage a variety of housing types to address the housing needs of a variety of household types, sizes, and incomes. Per to Program 7, the City will continue to provide incentives to builders to provide housing with multiple bedrooms affordable to lower-and moderate-income households. Per Program 15, the City will amend the RM-2 and RM-3 zones to remove single-family as a permitted use. Per to Program 12, the City will encourage the construction of ADUs, particularly in predominantly single-family neighborhoods with higher median incomes to reduce concentration of lower-income households.
Housing Assistance	
During both of the local and regional community workshops, participants discussed the need for homeownership opportunities.	Per Program 23, the City will promote the Fresno County Homebuyer Assistance Program and other available homebuyer resources on the City's website and public counters.

APPENDIX 1L: CITY OF REEDLEY

Public Comment	Relevant Program(s)
During the regional stakeholder consultations, interviewees expressed that there is need for mobile home assistance programs.	Per Program 20, The City will encourage the use of the Fresno County Housing Assistance Rehabilitation Program (HARP) provides loans to qualifying homeowners, including owners of mobile or manufactured homes, in the unincorporated county and participating cities for the improvement of their homes.
	Per Program 10, the City will provide financial support annually, as available, 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.
During the regional stakeholder consultations, interviewees expressed their frustration with the income eligibility of affordable housing programs.	Per Program 14, the City will encourage a variety of housing types to address the housing needs of a variety of household types, sizes, and incomes.
Interviewees expressed that people with higher incomes are not eligible for the program, yet they cannot afford housing on their income.	Per Program 23, the City will promote available homebuyer resources on the City's website and at public counters, such as Mortgage Credit Certificate (MCC), CalPLUS Conventional Program, and CalHFA Conventional Program.
	Per Program 25, the City will work with the Housing Authority to disseminate information to landlords and property owners on incentives for participating in the HCV program throughout the City to promote housing opportunities for all residents. Also, the City will refer interested households to the Fresno Housing Authority and encourage landlords to register their properties with the Housing Authority for accepting HCV's.