

**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT  
DIVISION OF HOUSING POLICY DEVELOPMENT**

651 Bannon Street, Suite 400  
Sacramento, CA 95811  
(916) 263-2911 / FAX (916) 263-7453  
[www.hcd.ca.gov](http://www.hcd.ca.gov)



December 11, 2024

Jennifer Clark, Director  
Planning and Development Department  
City of Fresno  
2600 Fresno Street, Third Floor  
Fresno, CA 93721

Dear Jennifer Clark:

**RE: City of Fresno's 6th Cycle (2023-2031) Revised Draft Housing Element**

Thank you for submitting the City of Fresno's (City) revised draft housing element received for review on October 29, 2024, along with revisions received on November 20, 2024 and December 3, 2024. The revisions were posted and made available to the public for seven days prior to review. Pursuant to Government Code section 65585, the California Department of Housing and Community Development (HCD) is reporting the results of its review. In addition, HCD considered comments from Leadership Counsel for Justice and Accountability pursuant to Government Code section 65585, subdivision (c).

The revised draft, including revisions, element meets the statutory requirements described in HCD's October 7, 2024 review. This finding is based on, among other provisions, Policy 2.11 that make prior identified sites available and permits housing development with 20 percent affordability to lower-income households without discretionary action. The housing element will substantially comply with State Housing Element Law (Gov. Code, § 65580 et seq) when it is adopted, submitted to and approved by HCD, in accordance with Government Code section 65585, subdivision (g).

As a reminder, the City's 6th cycle housing element was due December 31, 2023. As of today, the City has not completed the housing element process for the 6th cycle. The City's 5th cycle housing element no longer satisfies statutory requirements. HCD encourages the City to adopt the element, and submit to HCD to regain housing element compliance.

Public participation in the development, adoption and implementation of the housing element is essential to effective housing planning. Throughout the housing element process, the City must continue to engage the community, including organizations

that represent lower-income and special needs households and organizations that have commented on this revised draft, by making information regularly available while considering and incorporating comments where appropriate. Please be aware, any revisions to the element must be posted on the local government's website and to email a link to all individuals and organizations that have previously requested notices relating to the local government's housing element at least seven days before submitting to HCD.

Several federal, state, and regional funding programs consider housing element compliance as an eligibility or ranking criteria. For example, the CalTrans Senate Bill (SB) 1 Sustainable Communities grant, the Affordable Housing and Sustainable Communities programs, and HCD's Permanent Local Housing Allocation consider housing element compliance and/or annual reporting requirements pursuant to Government Code section 65400. With a compliant housing element, the City will meet housing element requirements for these and other funding sources.

For your information, some general plan element updates are triggered by housing element adoption. HCD reminds the City to consider timing provisions and welcomes the opportunity to provide assistance. For information, please see the Technical Advisories issued by the Governor's Office of Planning and Research at: <https://www.opr.ca.gov/planning/general-plan/guidelines.html>.

HCD appreciates the hard work and dedication of the City's housing element team during the housing element update and review. We are committed to assisting the City in addressing all statutory requirements of State Housing Element Law. If you have any questions or need additional technical assistance, please contact Thomas Brown, of our staff, at [Thomas.Brown@hcd.ca.gov](mailto:Thomas.Brown@hcd.ca.gov).

Sincerely,



Paul McDougall  
Senior Program Manager