

APPENDIX 1A: COUNTY OF FRESNO

Fresno Multi-Jurisdictional 2023-2031 Housing Element

Revised HCD Review Draft - October 2024 with additional revisions as of Feb 27, 2025



A Regional Plan for Addressing Housing Needs

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

APPENDIX 1A: COUNTY OF FRESNO

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SECTION 1A-0: SUMMARY OF NEEDS AND CONDITIONS

Housing Needs Assessment

As part of the Housing Element, the County prepared a detailed Housing Needs Assessment (Section 2) analyzing the demographics in its unincorporated county areas. The Needs Assessment identified a number of trends that informed the goals and policies of the updated Housing Element, including:

- The unincorporated county population declined 0.2% annually on average between 2000 and 2022, while the countywide average annual growth rate was 2%. The number of households in the unincorporated county also experienced an annual decline of 0.2% between 2010 and 2020, while the countywide average annual growth rate for households was 0.7%. One of the main reasons for the slight decline in population and households is annexations.
- For those residents over the age of 4, approximately equal shares of residents in unincorporated communities are either school-age students (ages 5 to 17, 25.7% of residents), young adults (ages 25 to 44, 24.3% of residents), or middle-aged adults (ages 45 to 64 years, 21.5%). Those aged 65 or over represent 16.6% and those aged 18 to 24 represent 8.4%.
- Approximately half of residents in the unincorporated county, 50.3%, identified as Hispanic or Latino of any race.
- The median household income in the unincorporated county in 2020 was \$62,571, higher than the countywide median income of \$57,109.
- The most common industry of employment in the unincorporated county was educational services, health care, or social services (22.3% of employed residents).
- More than two-thirds of households (68.9%) in the unincorporated county were homeowners as of 2020.
- Unincorporated communities in Fresno County had the highest vacancy rate in the county in 2022 at 12.2% across all housing units, regardless of tenure. This was a slight decrease from its 2010 vacancy rate of 13.7%.
- Unincorporated communities had the highest rate of older housing stock as compared to the cities in Fresno County. More than three-quarters of all housing units in these communities (78.8%) were built more than 30 years ago, and 47.4% were built more than 50 years ago. Countywide, rates of housing stock in similar age ranges were 64.5% and 32.9%, respectively. Based on a 2023 windshield survey, out of the roughly 61,000 units across the entire unincorporated county, between 2,800 and 4,500 units are in need of some level of rehabilitation assistance, with roughly half of those in need of minor assistance and the other half in need of more substantial assistance.

- The unincorporated county experienced the lowest rate of households overpaying for housing in 2018, with 29.1% of all households overpaying for housing compared to 37.8% across the county. The number of lower-income households overpaying for housing was also lower in the unincorporated county (30.3% compared to 70.6% countywide).
- The unincorporated county had a comparable rate of household overcrowding and severe overcrowding compared to the county as a whole among both renters and homeowners.
- The unincorporated county had a similar rate of large households, those with five or more members, compared to the county as a whole (18.4% of households in the unincorporated county compared to 18.1% countywide).
- Between 2021 and 2022, the average sale price of a home in some unincorporated county communities changed significantly. Note, however, that some areas contained a small number of listings and sales, which could create the impression of large swings in home prices when overall patterns remain similar. Additionally, interest rates were increased starting in 2022, which applied downward pressure on pricing. The direction of the change was not consistent across all areas:
 - Average home prices in Friant, and Prather decreased by 32.9%, and 26.9%, respectively, while prices increased substantially in some communities like Caruthers (62.3%).
 - Average sale prices rose 15.4% in the county as a whole during the same period.
- In 2020, the percentage of the unincorporated county's population that was aged 65 or older was higher than in the county as a whole (16.8% of the unincorporated county compared to 12% countywide). The majority (85.2%) of the unincorporated county's senior households were homeowner households.
- Over one-third of seniors in the unincorporated county (37.1%) had a disability.
- The percentage of households in the unincorporated county with single female heads of household was lower than the countywide rate (3.3% in the unincorporated county compared to 7.3% countywide), the lowest rate of this household type in the county. Additionally, 28.3% of female-headed households in the unincorporated county were living under the poverty level, which is less than across the county as a whole (34%).
- The unincorporated county had a higher rate of residents with disabilities than the county as a whole (13.6% compared to 12.9% countywide). Ambulatory difficulties were the most commonly reported disability.
- Estimates from the 2023 Point-in-Time count suggest that 141 persons in the unincorporated county may have been experiencing homelessness.

- Of the 58,762 year-round and seasonal farmworkers across the county in 2017, 37,819 workers (64.3%) worked 150 days or more each year, and 35.7% worked less than 150 days per year. An estimated 13.6% of the unincorporated county's employed population worked in agriculture, higher than the countywide rate (8.8%).
- Extremely low-income residents (those earning 30% or less of median income) made up 8.9% of the total households in the unincorporated county. Of those, 62.6% were renter households, and 37.4% were owner-occupied households.

Analysis of Needs and Resources to Meet the Needs

The unincorporated county's population has seen a decrease of 5,559 persons from 2000 to 2022. The decline in population since 2000 is a unique trend that may reflect annexations and households moving to incorporated cities where services and resources are more readily accessible. The population of the unincorporated county has a racial and ethnic distribution of White and Hispanic with a high presence of school age, young adults and middle-aged adults (77.0%). Typically, these age groups generate households that need multi-family options, homes with two or three bedrooms, and ownership opportunities. Median home values increased must faster than inflation rates between 2000 and 2010 (\$154,651 to 257,000), but increased well below inflation rates between 2010 and 2020 (\$257,000 to \$271,000). Housing values, however, can vary substantially across the various unincorporated communities, with homes in places like Shaver Lake continuously selling at very high prices while other places like Biola and Caruthers still representing relatively affordable prices. Housing prices during the COVID Pandemic surged throughout California and the nation as new households and those looking to move competed in a housing market that yielded very little new construction. The recent (2023) increase in interest rates decreased housing prices, though long-term affordability is little improved.

Lower-income households typically require assistance through County, state, or federal homebuyers' programs to purchase a home. For example, a down payment assistance loan program can help a household that can afford monthly mortgage payments and other housing related costs but due to their limited income, has difficulty saving enough money for a down payment. In response to this need, the County has included the following programs to increase housing mobility for lower income households: Program 25 to connect 40 prospective homebuyers with the County's Homebuyer Assistance Program and Program 33 which will encourage the construction of duplex, triplex, and fourplex housing to diversify the housing stock in predominantly single-family homes areas.

Households with extremely low incomes have a variety of housing situations and needs. This population includes persons who are homeless, persons with disabilities, farmworkers, college students, single parents, seniors living on fixed incomes, and the long-term unemployed. Some extremely low-income individuals and households are homeless. As noted previously, this population also includes part-time employees. For some extremely low-income residents, housing may not be an issue—for example, domestic workers and students may live in in-law units at low (or no) rents. Other extremely low-income residents spend a substantial amount of their monthly incomes on housing or may alternate between homelessness and

temporary living arrangements with friends and relatives. Households and individuals with extremely low incomes may experience the greatest challenges in finding suitable, affordable housing. Extremely low-income households often have a combination of housing challenges related to income, credit status, disability or mobility status, family size, household characteristics, supportive service needs, or exacerbated by a lack of affordable housing opportunities. Many extremely low-income households seek rental housing and most likely face overpayment, overcrowding, or substandard housing conditions and also face the risk of displacement. Some extremely low-income households could have members with mental or other disabilities and special needs.

In 2018, 8.9% of households were extremely low-income in the unincorporated county compared to 13.3% countywide. Of the 8.9% of households, of which a little under two-thirds were renter households and a little over one-third were owner households. This indicates a greater need for rental housing to support extremely low-income households. Furthermore, extremely lower-income households are overpaying for housing a much higher rate (58.6%) compared to all lower-income households (30.3%), as of 2018. Overall, 29.1% of households in the unincorporated county are overpaying for housing (2018). Given the significantly higher rates of overpayment among extremely low-income households, there is a great need for financial support and affordable units to meet the needs of this population.

However, there are 4,625 extremely low-income households in the unincorporated county, and the total RHNA for extremely low-income units for this Housing Element was 353. There will still be unmet need for extremely low-income households even if the County meets its quantified objectives for this Housing Element cycle. Therefore, the County has included programs to construct, rehabilitate, and conserve affordable housing for extremely low-, very low-, and low-income households. These programs overlap and therefore identify multiple strategies to achieve the RHNA, some of which are planned to continue beyond this Housing Element cycle. For instance, the County has included Program 17 to incentivize and support construction of one affordable multi-family housing development in the unincorporated county, Program 18 to incentivize and encourage construction of units specifically targeting extremely low-income households, and Program 26 to increase the availability of information and access to Section 8 rental assistance and units. Other 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.

It is estimated that approximately 141 residents in the unincorporated county were unsheltered in 2022, representing 23.3% of the total sheltered and unsheltered homeless population (605) within Fresno County but outside of the City of Fresno. This 141 figure is an increase of 74 individuals from the 2014 PIT count where 67 individuals were identified. Several services are available to homeless residents locally and in the region, including those provided by Catholic Social Services, Emergency Housing Center (Plaza Terrace),

Evangel Home, Inc., United Way, Fresno Rescue Mission, and Marjaree Mason Center. A comprehensive list and description of resources is included in the Regional Multijurisdictional Housing Element in Section 2, Regional Housing Needs Assessment in the subsection called Homeless. The County has included Program 3: Collaborative Effort to Reduce Homelessness, Program 4: Homeless/Unhoused Needs, Program 6: Permanent Supportive Housing, Program 7: Room and Board Support and Technical Assistance, Program 8: Housing Navigation and Linkage Services, Program 9: Scattered Sites Master Leasing Housing, Program 10: Housing Coordination and Consultation, Program 11: Recovery Housing, and Program 12: Youth Homeless Prevention.

Given the significant size of the farmworker population in the unincorporated county, the housing needs for this group are significant. In 2020, 13.6% of the population was employed in agriculture, which has decreased since 2010 by 3.1%. Looking at the U.S. Department of Agriculture Census of Farmworkers, the number of permanent farm workers in Fresno County has decreased slightly from 2002 to 2017, decreasing from 18,751 farmworkers to 16,876 farmworkers. To prioritize housing for farmworkers, the County has included Program 35 to support funding for farmworker housing through incentives to housing developers including the Fresno Housing Authority and Self-Help Enterprises, in the application of funds for farmworker housing, for HCD and USDA Rural Development loans and facilitate a new affordable housing development in areas of concentrated need for farmworkers in the unincorporated county or a city that participates in the County's CDBG/HOME Joint Powers Agreement and to facilitate the rehabilitation and preservation of existing farmworker housing.

Looking closer at special needs groups within the unincorporated county, large households did not see a change from 2010 decreasing. On the other hand, female-headed households has seen a 5.2% to a 3.3% decrease. Overall, seniors and persons with disabilities all saw anywhere from 0.6% to 2.3% increase. While the need may not be as high as it was in previous years, the need is still there. To address the needs of special needs groups in the unincorporated county the County has included Program 13: Seniors/Persons with Disabilities, Program 17: Affordable Housing Incentives, Program 18: Extremely Low-Income Households, and Program 33: Improving Housing Options.

Unincorporated county residents were primarily employed in health and educational services (22.3% of jobs), agricultural (13.6% of jobs), and retail trade (10.8% of jobs), which is consistent with data from 2011. This shows a consistent trend within the employment industry for over ten years. Unemployment in unincorporated county has decreased from 9.7% in 2014 to 5.3% in 2022.

The unit composition of unincorporated county's housing stock has remained relatively consistent since 2010, with the predominant housing type being single-family detached units comprising 82.7% of the housing stock in 2010 and 82.9% in 2020. Multifamily units represent 5.4% of the housing stock, which has only seen a slight 0.7% decrease from 2010 to 2020. Owner-occupied households account for 68.9% of households in the unincorporated county with renter-occupied households representing the balance (31.1%). A windshield survey conducted in 2023 indicated that between 2,800 and 4,500 units across the entire unincorporated county (4.5% to 7.4%) may be in need of some level of rehabilitation assistance.

Program 23: Fresno County Rehabilitation Program will expand access to financial resources and provide direct rehabilitation assistance across the unincorporated county. Additional resources to assist with home rehabilitation are listed in the Regional Multijurisdictional Housing Element in Section 4, Opportunities for Residential Development in the subsection called Financial and Administrative Resources.

Housing Constraints

While the County 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. Below is a summary of typical constraints that have been removed or were not considered constraints based on the County's standards, procedures, and policies.

- The County is undertaking a General Plan Review and Revision Process and update of the Zoning Ordinance to achieve consistency between the General Plan and Zoning Ordinance.
- The update of the Zoning Ordinance included changes to bring the ordinance in line with state law, such as: changes to permit employee housing, low barrier navigation centers, transitional and supportive housing, and accessory dwelling units (ADUs).
- In 2018, the County Board of Supervisors voted to suspend Public Facilities Impact Fees, though fees
 paid to community services districts, regional agencies, and school districts must still be paid.
- Current standards for off-site improvements are not considered a barrier to development, and the County does not require improvements other than those deemed necessary to maintain the public health, safety, and welfare.
- The County's project application review process and timeline are not a constraint for processing multiple-dwelling unit projects and housing affordable to low-income residents.
- The County's Reasonable Accommodation procedure does not present a barrier to development or to the provision of housing for persons with disabilities.

Nongovernmental constraints include challenges such as: water access, the desire of some property owners and agricultural businesses to preserve land for agricultural use, the availability of private financing, and the increasing cost of land in the county and across the region. A number of the goals and policies in the Housing Element are aimed at eliminating or lessening constraints to the 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 unincorporated county's Regional Housing Needs Allocation (RHNA). The Housing Element identifies sites in Fresno County where zoning is in place to allow for housing development, including higher-density housing (20+ units per acre) that is suitable for affordable housing development.

- Fresno County has identified sufficient development projects that are already in the review process and vacant housing sites to meet its lower, moderate- and above-moderate housing allocation.
- The County provides several programs designed to help residents purchase or maintain affordable and market-rate housing. These include the Housing Assistance Rehabilitation Program (HARP), Homebuyer Assistance Program (HAP), and Rental Rehabilitation Program (RRP).
- The County will expand the variety of more affordable housing options beyond the conventional singlefamily detached home by promoting the development of ADUs in the unincorporated county and by amending the Zoning Ordinance to permit duplex, triplex, and fourplex dwellings in communities with appropriate infrastructure during its update of Community Plans.

SECTION 1A-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 County of Fresno Public Works and Planning Department (PWP) will assist the Fresno Council of Governments (FCOG) in coordinating Countywide Sixth-Cycle Housing Element Working Group.
- The Housing Element Working Group (HEWG) will meet at least annually to evaluate successes in the implementation of programs and to identify gaps and additional needs.
- PWP will continue to participate in Countywide collaboration efforts on housing program implementation and regional issues including: disadvantaged communities (SB 244 and SB 1000), infrastructure challenges, farmworker housing, homelessness, and fair housing.
- The HEWG will meet periodically with the Fair Housing Council of Central California to discuss fair housing issues and opportunities for education.
- The HEWG will advocate on behalf of the Fresno County region for more grant funding for affordable housing and infrastructure improvements.
- PWP will continue to seek partnerships with other jurisdictions in the region and other agencies such as: the Fresno County 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 County will coordinate with other jurisdictions to develop a multilingual directory of housing services and resources available in the region for lower-income households. The directory will include a chapter detailing housing services and resources that are available to farmworkers. The County will also coordinate with the other jurisdictions to review and update the directory periodically. The directory will be available on the websites and offices of the County and participating jurisdictions, including the creation of a Quick Response (QR) Code for easy access to the document, and shared with community-based organizations. The directory will complement or be incorporated into the 211 Helpline produced by the United Way, the County of Fresno, and other agencies and organizations.

Financing	General Fund
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Time Frame	Continue to meet with the Housing Element Working Group once per year; meet with HCD annually. Develop a directory of services and resources by December 2025; update annually as needed and incorporate/connect into United Way 211 Helpline
Implementation Responsibility	Department of Public Works and Planning
Quantified Objective	Convene Housing Element Working Group annually; annually meet with HCD; develop a directory of housing services and resources by December 2025
Relevant HE Policies	1.3–1.6, 2.1, 4.2, 4.6, 5.2

Program 2: Review Annexation Standards in Memorandum of Understanding

The County is currently in the process of extending its memorandum of understanding (MOU) with the 15 cities in Fresno County. With the exception of the Cities of Fresno, Sanger, and Huron, whose MOUs have expired, all jurisdictions in Fresno County have a current City-County MOU. The City-County MOU addresses property and sales tax revenue sharing, directing growth to the City consistent with the County's General Plan, promotion of economic development in form of streamlined annexation standards for meeting respective RHNA obligations and industrial and regional commercial uses, mutual collection of development impact fees, and compliance with City development standards when the County approves development with the City's SOI.

The City-County MOU requires that between 25% and 50% of proposed annexation areas, depending on jurisdiction, have an approved land use entitlement (tentative subdivision map for residential or approved land use application for non-residential). While cities can take certain steps to "prezone" land in advance of annexation, annexation of land into city limits is generally driven by requests from private developers.

During the Housing Element planning period, the County of Fresno will complete the extension of pending MOUs, and participating cities will continue to work together to review and revise, as deemed appropriate by all parties, the standards for annexation contained in the City-County MOU. Either as part of the City-County MOU, or separately, the County will also coordinate with all 15 cities regarding the appropriate transfer of RHNA credit and RHNA responsibility associated with land to be annexed, particularly any sites identified in the County's sites inventory to accommodate lower- or moderate-income RHNA.

Financing	General Fund
Timeframe	Meet with all participating jurisdictions by December 2026 to review MOU standards, and update by December 2027 if changes are needed
Implementation Responsibility	Department of Public Works and Planning; County Administration Office

Quantified Objective	Extend MOUs as necessary and incorporate RHNA transfer agreements into MOUs during the planning period
Relevant HE Policies	1.1–1.6

Emergency, Supportive, and Transitional Housing

Program 3: Collaborative Effort to Reduce Homelessness

The County of Fresno, through the Department of Social Services and the Department of Behavioral Health, has representation in the Fresno Madera Continuum of Care (FMCoC). All participating agencies, through joint efforts, seek to reduce homelessness in the County by:

- Actively participating in FMCoC meetings and subcommittees as well as facilitating meetings and planning efforts for funding and services.
- Partnering with the FMCoC in submitting joint Homeless Housing, Assistance and Prevention (HHAP) Grants (or other funds as they become available) to meet the needs of the community and address potential gaps in services for all populations experiencing homelessness.
- Holding annual trainings for providers on how to connect their clients to mainstream benefits.
- Building and enhancing relationships with various organizations and agencies such as health providers and housing developers.
- Continuing to participate in the Built for Zero campaign, focused on ending chronic and veteran homelessness.

Financing	Homeless Housing, Assistance, and Prevention (HHAP), US Dept of Housing & Urban Development (HUD), and Emergency Solutions Grant (ESG)
Time Frame	Ongoing
Implementation Responsibility	Department of Social Services; Department of Behavioral Health (in collaboration with other participating Fresno County departments)
Quantified Objective	Strive to reduce the number of unsheltered homeless by 10% countywide during the planning period, as compared to the 2023 Point-in-Time (PIT) count
Relevant HE Policies	4.6

Program 4: Homeless/Unhoused Needs

The County will coordinate with FMCoC and other agencies in completing the Point-in-Time (PIT) count and developing programs aimed at providing homeless services. As a part of this coordination, the County will:

- Identify community residents and local community-based organizations to participate in the PIT count to focus on including additional rural unincorporated communities.
- Meet with interested community-based organizations and partners prior to each January PIT count to identify strategies to recruit volunteers and conduct a local count, with special attention given to conducting counts in unincorporated communities.
- Monitor the needs and demographic composition of the unhoused population to identify how to target resources. Provide education on financial assistance and program availability.
- Support local homeless service providers, agencies, and other community organizations to pursue funding from available sources for homeless services.

The County will also continue to convene the Homeless Encampment Response Workgroup (HERW) or similar group. As part of this Workgroup, the County will:

- Coordinate internally and with local street outreach service providers to assess and triage homeless encampment response.
- Coordinate with other jurisdictions to address and resolve homeless encampments that impact multiple jurisdictions.
- Dispatch street outreach teams to engage with unhoused individuals residing in homeless encampments to offer services and provide linkages to community resources.
- Resolve homeless encampments to address health and safety concerns and reduce the impact to the surrounding community.

Financing	PIT: In-kind donations (primarily from FMCoC member agencies) HERW: General Fund, American Rescue Plan Act (ARPA), Mental Health Services Act (MHSA), Providing Access and Transforming Health (PATH), Homeless Housing, Assistance and Prevention (HHAP)
Time Frame	PIT: Biannually reach out to potential partners and hold strategy meetings prior to scheduled Point-in-Time counts Convene HERW meetings on a monthly basis; triage homeless encampment reports and dispatch street outreach teams, and resolve homeless encampments as needed
Implementation Responsibility	PIT: County Administrative Office; Department of Public Works and Planning; Department of Social Services

	HERW: County Administrative Office, Sheriff's Office, County Counsel, Environmental Health, Public Works and Planning, Behavioral Health, Social Services, and Internal Services
Quantified Objective	PIT: Assist FMCoC in conducting PIT count with a focus on identifying unhoused individuals and families in unincorporated communities; conduct counts in two additional communities that have not historically been included in the count
	HERW: Triage 100% of reports of homeless encampments submitted to the Workgroup; meet monthly to prioritize and collaborate on the homeless encampment resolution process
Relevant HE Policies	4.6

Program 5: Access and Transforming Health

The County will engage in outreach to provide housing support services to enable individuals to live in their communities and avoid homelessness, hospitalization and/or jail detention. The County will contact individuals frequently, either where they live or are most comfortable, to ensure they have access to services. The County will provide directly or provide access to the following types of services and resources: transportation, clothing, food, hygiene, education, physical and mental health assessments, behavioral and physical health care, financial, educational, vocational, rehabilitative, and other needed community services as they relate to meeting the person's mental health and housing needs.

Financing	Medi-Cal Federal Financial Participation, Mental Health Services Act Prevention and Early Intervention Fund, Crisis Care Mobile Unit Grant, American Rescue Plan Act (ARPA)
Time Frame	FY 2023-24 and on an annual basis
Implementation Responsibility	Department of Behavioral Health
Quantified Objective	Provide outreach, engagement, and linkage services to 350 individuals per year who experience homelessness and enroll 200 individuals per year into the Projects for Assistance in Transition from Homelessness (PATH) program and the Homeless Management Information System (HMIS)
Relevant HE Policies	4.6
Relevant EJ Policies¹	EJ-C.1 Local Healthcare Access

Note 1: The environmental justice policies referenced are from the 2024 General Plan.

Program 6: Permanent Supportive Housing

The Department of Behavioral Health will seek funding for permanent supportive housing inventory administered by the Department of Behavioral Health (DBH). Once funding is received, the County will

partner with development partners to build and maintain properties and provide property management services. The County also provides housing supportive services through contracted providers and the DBH Housing Access and Resource Team (HART).

Financing	Medi-Cal Federal Financial Participation, Mental Health Services Act Community Services and Support Fund California Department of Housing & Community Development (HCD) No Place Like Home Realignment Fund
Time Frame	Beginning in 2024, apply for funding when available
Implementation Responsibility	Department of Behavioral Health
Quantified Objective	Construct 75 permanent supportive housing units across the incorporated and unincorporated county in locations that are close to supportive services during the planning period
Relevant HE Policies	2.1, 4.1, 4.6

Program 7: Room and Board Support and Technical Assistance

Access to quality housing is one of the most effective ways to encourage recovery and help those that suffer from mental illness or other disabilities to live a full and meaningful life. The County will continue to partner with the Independent Living Association (ILA) to provide technical assistance and improve the quality of room and board housing throughout the County. ILA facilitates the placement of ongoing residence of individuals with disabilities and others who may benefit from a shared living environment into privately owned or operated homes or complexes. The tenants are able to live independently but are often on a fixed income and can have difficulty finding stable and affordable housing. ILA focuses on tenants that do not need supervision or care from their landlord, which means the homes or complexes do not require a license to operate.

Financing	Mental Health Services Act Prevention and Early Intervention Fund
Time Frame	Ongoing
Implementation Responsibility	Department of Behavioral Health
Quantified Objective	Support ILA in improving 50 independent living units to acceptable standards during the planning period; annually educate 20 individuals regarding ILA services
Relevant HE Policies	2.1, 4.1, 4.2, 4.6

Program 8: Housing Navigation and Linkage Services

The County will continue to participate in the Multi-Agency Access Point (MAP) program to assist individuals with access and linkage to services. These services include assistance with mental health, substance use, housing, social services, primary care, utilities, and food. The MAP collaborative will operate in Fresno Metro and Rural communities to provide individualized screening by navigators to document and understand clients' individual needs and motivation to be linked to services. Navigators will develop a service linkage plan and monitor success in connecting to assessments and services identified in the screening. MAP point navigators will assist clients in obtaining necessary documents such as: identification cards; social security cards; birth certificates; immigration related documents that are needed to link to appropriate services such as public benefits, housing and/or health insurance enrollment; and additional resources such as transportation, food, and any immediate medical resources.

Financing	Mental Health Services Act Community Services and Support Fund
Time Frame	Ongoing on an annual basis.
Implementation Responsibility	Department of Behavioral Health
Quantified Objective	Provide MAP services to 1,000 new individuals annually with linkages completed for 60% (600) of clients each year
Relevant HE Policies	4.6

Program 9: Scattered Site Master Leasing Housing

The County operates various units across the entire county for use as transitional housing leading up to permanent housing for individuals with serious mental illness that are experiencing homelessness or are at risk of homelessness. The County contracts with RH Community Builders to provide full-service property management.

Financing	Mental Health Services Act Community Services and Support Fund
Time Frame	FY 2024-25
Implementation Responsibility	Department of Behavioral Health
Quantified Objective	Increase the number of leased housing units from 68 to 75 by signing new contract with vendor, upon approval by Department of Behavioral Health Leadership and the Board of Supervisors
Relevant HE Policies	2.1, 4.1, 4.6

Program 10: Housing Coordination and Consultation

The Housing Access and Resource Team (HART) provides coordination and consultation related to housing for programs administered by the Department of Behavioral Health. Functions of the HART include review of housing inquiries submitted by treatment teams to determine eligibility for housing resources, liaison with property managers and landlords, processing approvals for linkage to housing options, ensuring reporting obligations for housing programs are satisfied, and providing supportive services including tenancy support and case management when treatment and support teams are unavailable. HART currently services those that are experiencing homelessness and housing for those at-risk of homelessness; for a total of 224 single occupancy units.

Financing	Mental Health Services Act Community Services and Support Fund
Time Frame	Ongoing
Implementation Responsibility	Department of Behavioral Health
Quantified Objective	Increase assistance to 300 individuals experiencing homelessness during the planning period through the Housing Access and Resources Team
Relevant HE Policies	4.6

Program 11: Recovery Housing

The County Department of Behavioral Health makes Recovery Residence (RR) available to adult males and females who are concurrently enrolled in a County-contracted Outpatient substance use disorder (SUD) treatment program or receiving medically necessary SUD recovery services. Contracted RR providers shall offer quality alcohol and drug-free housing. RRs are a supportive service to the SUD treatment continuum; therefore, providers that offer RR must be flexible with partnering and coordinating with treatment providers and other services which are part of the SUD treatment continuum. Currently, RR makes available approximately 60 beds, with plans to expand into perinatal RR for FY 23-24, which will include pregnant women and/or parents with children.

Financing	Substance Abuse Block Grant (SABG)
Time Frame	Ongoing
Implementation Responsibility	Department of Behavioral Health
Quantified Objective	Increase the number of Recovery Residence beds from 60 to 75 during the planning period, with a focus on beds for pregnant women and/or parents with children

Relevant HE Policies	2.1, 4.1, 4.6
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Program 12: Youth Homeless Prevention

The County provides ongoing services to youth (ages 18 to 24) through County programs and by providing funding to nonprofits and/or community-based organizations that aid in the prevention of homelessness. The County will continue to:

Promote participation from current and former foster youth in the Independent Living Program (ILP) to provide them with self-sufficiency skills including how to maintain housing

Financing	General Fund, California Department of Social Services
Time Frame	Ongoing
Implementation Responsibility	Department of Social Services
Quantified Objective	Assist, through collaboration with other local agencies, at least 100 youth (ages 18 to 24) to either prevent homelessness or to quickly rehouse them
Relevant HE Policies	Policy 2.1, Policy 4.6

Collaborate with local agencies in providing services to homeless youth

Program 13: Seniors/Persons with Disabilities

Through various programs and collaboration with other organizations, the County provides supportive services to seniors and persons with disabilities to ensure that they have stable housing adequate to their special needs. The County will continue to:

- Provide Aged, Blind, Disabled (ABD) Medi-Cal to connect recipients with supportive services. The
 ABD program seeks to help clients receive quality health care services so they may remain safely in
 their homes and in the community, working in partnership with estate and financial planning service
 providers, hospitals, clinics, and health advocacy groups. ABD also helps clients apply for
 Supplemental Security Income (SSI) through SSI Advocacy Services and for State Disability benefits.
- Provide In-Home Supportive Services (IHSS) to arrange for and help pay assistive services to enable elderly, blind, or disabled persons to live safely and independently in their own homes.
- Provide limited financial assistance through Adult Protective Services (APS) for home repairs or the installation of necessary medical or adaptive equipment such as handrails in showers and bathrooms. Clients may receive assistance with utility bills, housing, and transportation.

- Partner with local organizations to provide services to the disabled population experiencing homelessness through the Housing and Disability Advocacy Program (HDAP). This program provides disability advocacy, case management, emergency shelter, and deposit and rental assistance to individuals who are both homeless and disabled and seeking disability benefits.
- Partner with community organizations to provide emergency shelter, case management, housing search and placement, and rental subsidies for households in crisis, including but not limited to aged and disabled households.
- Partner with local organizations to provide Homeless Prevention and Rapid Solutions Diversion services to individuals experiencing a housing crisis, including, but not limited to the aged and disabled. Through these services, individuals can be reunited with family members, or receive short-term assistance to stabilize housing including direct financial assistance or assistance with facilitating arrangements with landlords or family members to retain housing.
- Partner with entities such as the Del Rey Community Services District and Fresno Madera Agency on Aging to identify resources the County can offer to seniors and inform residents of available services.
- Encourage developers to build multigenerational housing that contains a broader mix of bedroom counts to ensure there are units suitable for seniors (studio and/or one-bedroom units).

Financing	Adult Protective Services (APS) Allocation, In Home Supportive Services (IHSS) Admin Allocation, Housing and Disability Advocacy Program (HDAP) Allocation from California Department of Social Services (CDSS)
Time Frame	Ongoing
Implementation Responsibility	Department of Social Services
Quantified Objective	Attend three community meetings a year to increase awareness and conduct outreach and education regarding the availability of services for seniors and persons with disabilities Communicate with developers in connection with Programs 14, 17, 18, and 33
Relevant HE Policies	4.2, 4.5, 4.6

Adequate Sites

Program 14: Adequate Sites

The County will identify adequately zoned properties for a variety of housing types and ensure that there are adequate sites available to accommodate its remaining balance of its 2,350-unit Regional Housing Needs Allocation (RHNA) that has not already been met through permitted and built units. In support of this Housing Element, the County 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 currently in place and their ability to accommodate the development of housing to meet the needs of the County's current and future residents. The County will:

- Rezone sites as identified in Table 1A-8, with such sites rezoned for lower income RHNA capacity to require residential development at a minimum density of 20 units per acre. All sites to be rezoned involve zoning districts that already permit residential by right, whether or not at least 20 percent of proposed units would be affordable to lower income households, and therefore all rezoning for lower income RHNA would be in compliance with state law. The County adopted Ordinance No. R-505-3871 and Resolution No. 24-410 on December 17, 2024 to change the zoning and general plan consistent with the "Future" designations shown in Table 1A-8. However, to ensure consistency with state law is explicit and clear, the following language will be added to the Zoning Ordinance: "The following types of residential projects shall be allowed by right pursuant to Government Code section 65583.2(h) and (i): residential projects that include owner-occupied and/or rental multi-family residential units located on sites identified for rezoning in the 2023-2031 Housing Element in order to meet the lower income RHNA, provide appropriate densities, and incorporate a minimum of 20 percent of the units in the development as affordable to lower income households." Note that the one site that was reused from previous cycles is also being rezoned and will therefore be subject to the same requirement.
- Maintain and annually update the inventory of residential land resources.
- Monitor development interest and activity on sites listed in the vacant sites inventory and, upon County staff learning of a desire to develop such properties, communicate the requirement for the property owner or applicant to conduct tribal consultation with tribal entities identified by the Native American Heritage Commission and to demonstrate good-faith compliance in consultation and implementation. Examples of requests from tribal entities are listed below:
 - Conduct an archaeological record search for the site and land within one-half mile through the CHRIS Center and a Sacred Land Files Search and share the results with the tribal entity.
 - Retain the tribal entity for a Cultural Presentation for staff and crew prior to any construction activity, to also be made available for staff and crew that join the project after construction begins.
 - Enter into a Curation Agreement (or equivalent) prior to construction activity.
 - Have an Archaeological Monitor on site for all ground disturbance related to the project, with daily summaries/logs and immediate notifications of any discoveries of tribal resources sent to the tribal entity.
- Review County-owned property, identify surplus property, and complete the state submittal process in accordance with the Surplus Land Act by 2027.

- 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 consistency with Government Code section 65583.2(h) and (i) and that there is sufficient higher-density residential land available in higher resource areas and/or to affirmatively further fair housing.
- Continue to use and maintain the County's permit tracking system (known as AMANDA) that allows County staff to identify when a proposed project or building permit application would involve parcels from the sites inventory so that appropriate action can be taken by the County. Appropriate action would be to provide an analysis confirming that the inventory still has a surplus without inclusion of the subject parcel, or identification of a replacement parcel to maintain satisfactory inventory.
- Monitor development and other changes in the parcel-specific inventory to ensure the County maintains capacity consistent with its share of the RHNA for all income categories.
- Monitor the progress of pipeline projects on an ongoing basis and, if by December 2028 projects are deemed not likely to be completed in the planning period, evaluate capacity and identify alternative site(s) to meet this capacity, rezoning sites if needed.
- Monitor development progress of single- and multi-family development (site-built and manufactured) by affordability level throughout the planning period. If by December 2028 any income category is determined to not be on track to meet the RHNA targets, identify and implement additional strategies such as incentives or revised development standards within six months.
- Continue to designate and zone adequate sites to meet special housing needs as required.
- Continue to encourage a variety of housing types for all income levels such as mixed use and higher density housing through implementation of the General Plan and community plans, through incentives (e.g., density bonus) or other mechanisms encouraging affordability, maintaining existing zoning and upzoning where appropriate. These efforts will also consider promoting development within existing communities, active transportation and access to services and amenities.
- Incorporate Affirmatively Further Fair Housing (AFFH) analysis into decisions on approvals of housing projects that involve public funding and require consideration by the Fresno County Planning Commission or Board of Supervisors. Conduct and provide AFFH analysis as part of the staff report that is distributed in advance of Fresno County Planning Commission and/or Board of Supervisors meetings.
- Direct interested residential developers, especially those interested in developing affordable housing, to Community Plan and Specific Plan areas where amenities are or can be located and where water and wastewater service providers have capacity or there is potential for the expansion of infrastructure to meet development needs.

 Actively participate in the development of the next RHNA Plan to better ensure that the allocations are reflective of the County's General Plan policies and are realistic based on land use patterns in the unincorporated county.

Financing	General Fund
	Rezone sites as identified in Table 1A-8 before the end of 2024by April 2025, including additional explicit language on rezoning requirements to ensure continued compliance with state law
	Incorporate AFFH into land use and funding decisions beginning in June 2025
Time Frame	Annually monitor as projects are processed
	Review County-owned property, identify surplus property, and complete the state submittal process in accordance with the Surplus Land Act by 2027.
	Review progress of pipeline projects and identify alternative sites by December 2028 if projects are deemed not likely to be completed during the planning period.
Implementation Responsibility	Department of Public Works and Planning
Quantified Objective:	Maintain 100% capacity for unmet RHNA during the planning period
Relevant HE Policies	1.1–1.9

Program 15: Lot Merger and Subdivision

While the County's sites inventory is comprised only of parcels between 0.5 and 10 acres, there are a number of parcels larger than 10 acres that could support single-family and/or multi-family housing at a range of affordability levels. As needed to facilitate the development of housing, the County will facilitate lot mergers (aka lot consolidation) or subdivision (aka lot splitting) to promote the efficient use of land for residential development in compliance with the Subdivision Map Act and local ordinances, when an applicant submits an application. Currently, the County utilizes tools such as ministerial processing and other streamlining tools, as appropriate, to facilitate lot merging and subdivision. On a case-by-case basis, the County may use any of the strategies below to facilitate housing development :

- Assist developers/property owners in identifying opportunities for lot consolidation or lot splitting.
- Continue to streamline the processing of requests for lot mergers and lot subdivisions concurrent with other development reviews.
- Encourage the use of master or specific plans to provide a cohesive strategy for the development of large lots.

Financing	General Fund
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Time Frame	Ongoing and upon request
Implementation Responsibility	Department of Public Works and Planning
Quantified Objective	Facilitate five developments that involve lot mergers, lot subdivisions, and/or master/specific plans during the planning period
Relevant HE Policies	1.1, 1.5

Program 16: Coordination of Infrastructure and Services

Fresno County does not provide the scale of infrastructure that cities typically provide. The County manages a number of County Service Areas (CSAs) and Water Works Districts (WWDs) that were created to provide water and/or wastewater services to specific developments in the County. It is the policy of Fresno County to discourage urban-type development in areas designated for non-urban uses. The water and wastewater services in certain unincorporated communities are provided by service providers which are independent providers with their own governing boards. When development is proposed for an unincorporated community, County staff will continue to work closely with the developer and the service provider to facilitate adequate infrastructure to support the development. The County will continue to serve proposed development. The County will:

- Provide a copy of the adopted Housing Element to the various service providers serving the unincorporated communities.
- Communicate with water and wastewater service providers to reinforce the requirement to prioritize service for proposed developments that include housing units affordable to lower-income households consistent with the provisions of California Government Code Section 65589.7 (enacted through Senate Bill 1087, 2004).
- Continue to coordinate with independent service providers to assess development trends, needs for
 infrastructure and services, and plans for expansion. Communicate with the service providers at least
 annually or as major development applications are received to discuss and pursue plans for future
 expansion to ensure adequate infrastructure and services are available to meet the County's RHNA,
 consistent with housing development trends.
- Coordinate an annual meeting with community water and wastewater service providers to identify system upgrades, expansion, and consolidation of funding opportunities to ensure all community members have access to safe drinking water and wastewater services and meet annually with developers and community stakeholders to discuss and pursue or support additional funding sources.
- As part of coordination and communication with unincorporated community service providers, the County will provide assistance as appropriate to encourage infrastructure improvements in communities with infrastructure and service deficiencies.

- Seek (at least annually and on-going) and support funding applications by unincorporated community service providers for infrastructure and service expansions that are consistent with the County's General Plan including associated Community Plans.
- As funding permits, utilize Community Development Block Grant (CDBG) funds for infrastructure improvements to support development of affordable housing.

Financing	General Fund; Community Development Block Grant (CDBG)
Time Frame	Distribution of Housing Element to service providers within three months of adoption and certification; enforcement/reinforcement of state requirements on an ongoing/as-needed basis
	Maintain a list of community services districts/areas water and wastewater infrastructure systems capacity and expansion needs, in the unincorporated communities with updates as appropriate (anticipated to be three times during the planning period)
	Communicate and engage with CDBG-related activities in alignment with funding periods
Implementation Responsibility	Department of Public Works and Planning
Quantified Objective	Communicate with all water and wastewater service providers to reinforce the requirement to comply with state law and prioritize service allocations for affordable housing projects
	Maintain a publicly available list of community services districts/area water and wastewater infrastructure systems capacity and expansion needs
	Communicate with all water and wastewater service providers about CDBG funding for infrastructure projects, specifically in disadvantaged unincorporated communities such as Cantua Creek
	Award CDBG funding to three infrastructure projects that extend water and/or expand wastewater infrastructure to facilitate housing during the planning period
	Award CDBG funding for 13 infrastructure projects in unincorporated communities during the planning period that improve existing or add new infrastructure and services
Relevant HE Policies	1.7, 3.5
Relevant EJ Policies ¹	EJ-A.10 (Safe Drinking Water), EJ-A.11 (Prioritization of Improvement and Programs)

Note 1: The environmental justice policies referenced are from the 2024 General Plan.

Affordable Housing Development and Preservation

Program 17: Affordable Housing Incentives

The County shall provide loan funds (e.g., HOME Investment Partnerships Program (HOME), or Permanent Local Housing Allocation (PLHA)) as gap financing to eligible affordable housing developers to expand the supply of units affordable to lower-income households, including extremely low-income households and households with special needs, such as: seniors, disabled (including persons with developmental disabilities), farmworkers, homeless, and those at risk of homelessness. The County will offer assistance to other agencies in accessing local, state, and federal funding for affordable housing by sending letters of support for these agencies' efforts when possible. Specifically, the County will:

- Continue to offer incentives to facilitate the development of 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. Examples of incentives include: gap financing, County and state density bonus provisions, and streamlined processing (such as pre-application consultation to identify potential issues early on and concurrent processing of required permits to the extent feasible).
- Continue to seek partnerships and regularly meet, at least annually, with other agencies (such as the Fresno County Housing Authority), housing developers, community stakeholders and employers to discuss and pursue viable opportunities for providing affordable housing. Focus the efforts of these partnerships in lower resource areas where capacity for affordable housing exists, and identify opportunities to collaborate with other public and private entities to improve economic, health, and educational resources in areas, thereby improving the area's competitiveness for tax credit applications.
- Monitor the State Department of Housing and Community Development's (HCD's) and HUD's websites at least semi-annually for Notices of Funding Availability (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), farmworkers, homeless, and those at risk of homelessness.
- Continue to support and encourage other agencies and housing developers, such as the Fresno County Housing Authority and Self-Help Enterprises (SHE), in the application of funds, including State HCD and US Department of Agriculture (USDA) Rural Development loans and grants and other funding sources that may become available.
- Continue to invite and work with local developers including SHE, Habitat for Humanity, and Fresno
 County Housing Authority, in identifying land to develop in the county's unincorporated communities
 during the updating of the various community plans. The inclusion of local developers will assist the
 County in identifying land to rezone during the community plan process to facilitate the development
 of affordable housing. County staff have already begun this process and facilitated the introduction of
 SHE with a local land owner in Biola in hopes of purchasing and developing a project in the near future

- Continue to hold meetings with landowners and developers on a regular basis to assist them in identifying way to facilitate the development of their land or access to county funding to encourage the development of affordable housing.
- Continue current efforts to streamline and improve efficiencies in planning and permit approval and building inspection service.

Financing	HOME Investment Partnerships Program (HOME), Permanent Local Housing Allocation (PLHA), Low-Income Housing Tax Credit (LIHTC), Multifamily Housing Revenue Bond, US Department of Agriculture (USDA) Rural Development, and other funding sources as available
Time Frame	Ongoing as projects are proposed and processed by the County Annually or whenever grants are available apply for funding Meet with agencies, land owners, developers, and other stakeholders at least biannually (and as appropriate; e.g., in conjunction with community plan updates)
Implementation Responsibility	Department of Public Works and Planning
Quantified Objective	Utilize funding sources to facilitate the initiation of one affordable multi-family housing development in the unincorporated county within the planning period and facilitate the initiation of two affordable multi-family housing developments in a city that participates in the County's CDBG/HOME Joint Powers Agreement (County JPA) within the planning period
Relevant HE Policies	1.2, 1.5, 1.6, 1.9, 2.1, 2.3, 2.4, 2.5, 2.9, 4.3, 5.2

Program 18: 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 County permits single room occupancy (SRO) units in the R-2/2A, R-3/3A, and C-4 zones, with six or fewer SROs permitted by right and seven or more allowed with a conditional use permit, thereby offering housing options to extremely low-income households such as individual farmworkers. Through Program 20, the County will further streamline the approval process for SROs of any size. The County also allows mobile home parks throughout the T-P zone by right on sites at least three acres in size. While the R-3A zone will be removed through Program 33, there are no parcels currently designated with this zone, and so there would be no reduction in the number of parcels or amount of area where SROs are permitted.

To further support the development or rehabilitation of SRO units, mobile homes, and/or other units affordable to extremely low-income households, such as supportive and multifamily units, the County will continue to seek and pursue state and federal funds to offer a variety of incentives, such as:

- Support the application of funding as available to organizations, such as Community Housing Council (CHC), 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 when necessary regulatory incentives for the development of units affordable to extremely lowincome households and housing for special-needs groups, including persons with disabilities (including developmental disabilities), individuals, and families in need of emergency/transitional housing.
- Encourage the provision of affordable housing for young adults through planning consultations, streamlined permit processing, and funding assistance when possible.
- Provide zero-interest loans to finance the development of new affordable mobile home parks and the
 preservation of existing affordable mobile home parks by conversion to ownership or control by
 resident organizations, nonprofit housing sponsors, or local public entities.
- Continue to provide exclusive access to HOME Program funds during the first two months of each funding cycle to mobile home projects and provide technical assistance upon request.
- Encourage the development of SRO facilities, transitional and supportive housing, and other special housing arrangements, including seeking funds to help affordable housing developers provide SRO facilities. Continue to identify candidate sites for affordable housing projects on an annual basis and proactively conduct outreach to local developers regarding these sites (in conjunction with Program 17).

Financing	Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), USDA Rural Development, Permanent Local Housing Allocation (PLHA)
Time Frame	Ongoing as projects are processed by the County By December 2025, conduct outreach to organizations that support extremely
	low-income residents to understand funding needs Review and prioritize local funding at least twice in the planning period, and
	support expediting applications on an ongoing basis
	Provide exclusive access to HOME Program funds during the first two months of each funding cycle to mobile home projects
	Meet with agencies, land owners, developers, and other stakeholders at least biannually (and as appropriate; e.g., in conjunction with community plan updates)
Implementation Responsibility	Department of Public Works and Planning; Department of Behavioral Health

Quantified Objective	Provide letters of support, when possible, to facilitate development or rehabilitation of 12 housing units for extremely low-income households and assist one mobile home park during the planning period
Relevant HE Policies	1.2, 2.1, 4.1–4.6

Program 19: Preservation of At-Risk Housing Units

The County has few affordable rental housing projects in unincorporated communities, and one is considered at risk of being converted to market-rate housing. The County will continue to monitor the status of affordable housing projects and other affordable housing agreements (such as density bonus agreements).

As of May 2023, there are nine affordable farm labor housing units at Brown Dairy 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 County shall:

- Contact property owners of units at risk of converting to market-rate housing within one year of affordability expiration to discuss the County'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.

Financing	US Department of Agriculture (USDA) Rural Development, Low-Income Housing Tax Credit (LIHTC), Multifamily Housing Revenue Bond, HOME Investment Partnerships Program (HOME), and other funding sources as available
Time Frame	Annually monitor units at risk of converting and coordinate noticing as required per California law
Implementation Responsibility	Department of Public Works and Planning
Quantified Objective	Within the planning period, extend affordability restrictions for 9 farmworker units by 20 years
Relevant HE Policies	3.6, 4.3

Removal of Governmental Constraints

Program 20: Zoning Ordinance Amendments

The County will continue to monitor the effectiveness and appropriateness of the Zoning Ordinance to minimize barriers to affordable housing production and facilitate housing for the homeless and other persons with special needs and make amendments as necessary. The County will update its Zoning Ordinance to make the following changes:

- Permit Low-Barrier Navigation Centers within all zones allowing mixed-uses and all nonresidential zones allowing multifamily residential.
- Revise the permitted uses for the C-1, C-2, C-3, and C-6 zones to allow supportive housing subject to the same review process as the same development type in the same zone in a ministerial manner.
- Revise permitted uses in the C-P. C-1, C-2, C-3, C-4, and C-6 zones to permit transitional housing subject to the same review process as multi-family uses in the same zone.
- Clarify definitions of accessory dwelling units (ADUs) and second dwelling units. Revise Table 2-6 in the Zoning Ordinance to clarify that ADUs are a permitted use (P) in the C-3 and C-6 zones. Remove owner-occupancy requirements on ADUs until 2025. Reflect changes to state law enacted in September 2024 through SB 1211.
- Define conditions for permitting residential uses in commercial zones in urban areas under SB 6 and AB 2011 (including the extension and revisions enacted (through AB 2243) in September 2024).
- Revise the definition of "emergency shelters" to include other interim interventions, including but not limited to, navigation centers, bridge housing, and respite or recuperative care, consistent with California Government Code Section 65583(4)(A).
- Amend section 834.4.340 (A) on Single Room Occupancy (SRO) uses to clarify the text, removing the phrase "persons with disabilities" to avoid confusion with residential care facilities. Establish objective standards to address any concerns for larger (7+) SRO projects so that smaller and larger SRO projects are permitted in the same manner, subject only to objective standards. Remove the requirement for a CUP for larger (7+) SRO projects and instead permit all SRO projects (regardless of size) through an administrative (non-discretionary) approval process, subject only to a Site Plan Review requirement to ensure compliance with the County's objective development and improvement standards.
- Amend its permitted uses tables to correct a clerical error and remove "Density Bonus" as a use in order to clarify that the density bonus is permitted in every zone where residential uses are permitted, and include additional language to reflect AB 2694 signed by the Governor on September 19, 2024 (note that the County has in its Zoning Ordinance a density bonus that otherwise complies with State law).
- Revise the Reasonable Accommodations procedure to clarify that appeals to Reasonable Accommodations decisions may only be made by the applicant or the personal beneficiary of the accommodation.

The latest changes (as of September 2022) in state law regarding the allowance of residential uses in any commercial zone (enacted through Senate Bill 6 and Assembly Bill 2011) through the year 2033, have not been incorporated into the County's Zoning Ordinance update. Through the implementation of this program, the County will apply state law to all development applications and update its Zoning Ordinance formally to reflect state law within six months of Housing Element adoption and certification.

Additionally, the County will meet with developers to identify whether any of the required findings or other aspects of the development review process have presented constraints to development and amend its project review process to address these constraints as is feasible. The County will also review required conditional use permit findings and amend the Zoning Ordinance as needed to remove subjective findings, including clarifying finding 1 to specify that site adequacy may only be determined through objective standards, and removing finding 3 or redefining the finding to use objective standards. Finally, the County will review (and revise as necessary) the DRA process to ensure that it is limited to compliance with objective standards. Amendment will be completed by 2025.

Financing	General Fund
Time Frame	Annually review housing laws and the Zoning Ordinance Adopt changes related to state housing law by December 2025 Meet with developers to discuss permitting processes, and amend permitting processes and conditional use permit findings for objectivity by December 2025
Implementation Responsibility	Department of Public Works and Planning
Quantified Objective	Amend the Zoning Ordinance as necessary
Relevant HE Policies	2.7, 4.1

Program 21: Monitoring of Planning and Development Fees

The County charges various fees to review and process development applications and has previously adopted Public Facilities Impact Fees which were collected to finance countywide/unincorporated government and public protection facilities associated with the impact of new growth. On May 19, 2015, the Board of Supervisors conducted a public hearing to consider an amendment to repeal the Public Facilities Impact Fees Ordinance in its entirety. At the conclusion of the hearing, the Board decided to continue suspension of the impact fees to November 9, 2017. In 2018, the Board of Supervisors conducted a public hearing to consider an amendment to the County Ordinance for Public Facilities Impact Fees and decided to continue the suspension of the impact fees until further notice. Should the Board reinstate impact fees, staff will monitor the fees annually to ensure they do not unduly constrain housing development.

Financing	General Fund
Time Frame	As part of any consideration of the reinstatement of fees, include an evaluation of such fees as a potential constraint on housing; if fees are reinstated, monitor the impacts of the fees annually throughout the planning period
Implementation Responsibility	Department of Public Works and Planning
Quantified Objective:	Should the Board reinstate public facilities impact fees, monitor fees annually and reduce or suspend fees that would unduly constrain housing development
Relevant HE Policies	1.4, 2.7

Program 22: Preliminary Applications (SB 330) and Streamlined Approval (SB 35)

The County will continue to offer pre-application reviews and develop a pre-application form, checklist, and procedure (creating its own or using the Preliminary Application Form developed by HCD), pursuant to legislation enacted through SB 330. The County will also establish and publish a written policy and/or procedure, and other guidance documents as appropriate, to specify the SB 35 streamlining approval process and standards for eligible projects under Government Code Section 65913.4, and as defined in section 824.3.140 of the County's Zoning Ordinance. The applications will be available on the County's website for developers interested in pursuing the streamlined process or vesting rights.

Financing	General Fund
Time Frame	Incorporate an SB 330 preliminary application form, checklist, and process by June 20252026 Develop an SB 35 streamlined approval process by June 2026 Continue to process applications in compliance with SB 330/35 in the interim
Implementation Responsibility	Department of Public Works and Planning
Quantified Objective	Updated application form, checklist, and approval process in compliance with SB 330 by June 2025 2026 and SB 35 by June 2026
Relevant HE Policies	1.4, 2.3, 2.7

Housing Quality

Program 23: Housing Preservation and Rehabilitation

The County manages a number of programs for homeowners and renters that enable existing residents to improve and preserve their places of residence. These programs provide loans or grants to qualifying

APPENDIX 1A: COUNTY OF FRESNO

homeowners and owners of rental properties with qualifying tenants in the unincorporated county and participating cities for rehabilitation and improvement activities that facilitate the health and stability of occupants, prevent further deterioration, and reduce the risk of displacement.

The Housing Assistance Rehabilitation Program (HARP) for homeowners and Rental Rehabilitation Program (RRP) for owners of rental housing both fund improvements such as: energy efficiency upgrades and installations, climate adaptation and resiliency improvements, HVAC replacement or installation, roof replacement, health and safety code corrections, accessibility modifications, and ADA upgrades.

Loan terms for homeowners vary according to household income and the improvements and repairs that are needed. Loan terms for qualifying rental property owners include zero interest loans for making improvements to their rental properties occupied by eligible tenants.

For homeowners, the County is also exploring using Permanent Local Housing Allocation (PLHA) funds to amend the HARP program to address minor rehabilitation needs, which will better serve those applicants who neither require nor can afford more substantive remodeling required by existing HARP rules. Pursuant to positive community feedback and authorization by the County's Board of Supervisors, the minor rehab program will blend loans with small grants to improve access to the program and better meet the needs of lower-income homeowners.

The Lead Hazard Control Program (LEAD) manages grants to allow rental and owner-occupied houses in the County to remediate lead-based paint hazards. LEAD program coordination within the Department of Public Health identifies homes where children have been diagnosed with lead poisoning and are prioritized with remediation services. In addition, the program includes preventive education and outreach to high-risk areas, surveillance cases, and case management for children with high levels of lead poisoning. Preventative education grant has been received since 1991 for Childhood Lead Poisoning Prevention Program (CLPPP).

The Utility Connection Program (UCP) provides loans to eligible low- and moderate-income homeowners and housing owners with lower or moderate-income tenants to connect the home to an existing wastewater or water system. Permit fees are paid by the County with the loan providing for the connection construction cost. Loans are zero to 3% interest depending on income eligibility, with affordable monthly payments. The balance of the loan is due upon change of title or non-occupancy by the borrower.

In addition, all of these programs include outreach and education to increase awareness, expand preventive education in high-risk areas, and other activities, particularly on issues such as lead-based paint exposure risk for children in housing.

As part of Program 35, the County will also conduct targeted proactive code enforcement to property owners that are known to provide housing to farmworkers and connect them with home rehabilitation resources to improve housing conditions for this segment of the community.

Financing	Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), Lead Program Grant
Time Frame	Update materials as necessary, or as new information becomes available, and send targeted promotion annually; conduct general preventative education and targeted outreach annually; provide rehabilitation loans annually starting 2024
Implementation Responsibility	Department of Public Works and Planning; Department of Public Health
Quantified Objective	Raise awareness of HARP assistance by providing targeted promotion annually to households identified in the windshield survey to: Calwa, Cantua Creek, Lanare, Laton, Mayfair, Raisin City, and Squaw Valley
	Conduct broad outreach meetings targeting at least 500 households annually and focused outreach to reach at least 150 households with children annually
	In addition to ongoing outreach efforts, conduct two Spanish-language media (tv and/or radio) campaigns and three bilingual social media campaigns throughout the County and participating cities during the planning period
	Apply for at least one grant during the cycle and/or modify an existing grant to dedicate funds for housing preservation and rehabilitation
	HARP and RRP: Provide rehabilitation assistance to a total of 55 households throughout the planning period: 21 ownership households and two rental households in the unincorporated communities: Calwa, Cantua Creek, Lanare, Laton, Mayfair, Raisin City, and Squaw Valley: and 32 ownership households in partner cities
	LEAD: Provide assistance to 133 low-income households in the County during grant period November 2021 through April 30, 2025, to remediate lead-based paint hazards to qualified homes; targeted outreach to lead poisoned children households 150 annually. General outreach to reach 700 people regarding childhood lead poisoning prevention and surveillance cases
	UCP: Provide two prospective lower or moderate-income homeowners or housing owners with lower or moderate-income tenants with UCP assistance in unincorporated or incorporated communities; distribute information materials regarding the UCP to building officials and service providers four times during the planning period
Relevant HE Policies	3.2, 3.4, 4.1
Relevant EJ Policies ¹	EJ-D.1 (Home Rehabilitation), EJ-D.2 (Assisted Home Rehabilitation)

Note 1: The environmental justice policies referenced are from the 2024 General Plan.

Program 24: Code Enforcement

The Department of Public Health (DPH) acts as the lead agency in addressing issues of substandard housing. DPH receives complaints, investigates, performs site visits, and issues notices of violation. The County receives over 100 complaints a year. All complaints are reviewed for relevance to see if they require

further processing and a site visit. Roughly 80% to 90% of complaints include, but are not limited to, problems related to: electrical, plumbing, and wastewater systems; infestation; and mold. Investigations typically result in 50% of sites receiving notices of violation.

The Department Public Works and Planning (PWP) is the enforcement agency for matters related to zoning and building code violations. The code enforcement process involves several steps including: receipt of complaints, initial review of codes and site conditions to verify the existence of the offending action, confirmation that a violation of code(s) exists, issuance of correspondence to inform the property owner of the complaint/violation, issuance of citations, and legal action if warranted. PWP receives an average of over 600 code enforcement complaints per year, the majority of which, upon verification, become code enforcement cases. These cases can range from illegal construction and operating businesses without proper approval to over height fences and poorly maintained yards. The Code Enforcement process seeks to find a cooperative means of abatement but can result in citations and the aforementioned legal action to attain compliance. Though the size of the unincorporated county area makes proactive code enforcement through regular windshield surveys infeasible, the County proactively visits with community members and service providers during a variety of periodic meetings to obtain feedback on housing-related issues, including annual housing meetings and recent meetings related to the General Plan, Housing Element, and Community Plan updates. Through this process the County regularly receives feedback on areas in need of review by code enforcement officers. The County will intentionally solicit feedback from community members on code enforcement-related issues through these and other community meetings during the planning period. The County will also proactively connect property owners of farmworker housing with any available housing rehabilitation resources.

The County provides the Zoning Ordnance and County Ordinance Code, including Title 15 (local building code provisions) on the County website. The Department of Public Works and Planning provides code and code enforcement education and resource materials to the general public on the code enforcement webpage and at any time upon request in an effort to minimize code violations based on lack of information. PWP staff also educates property owners in violation during the initial discussions of and throughout the enforcement process.

Financing	General Fund
Time Frame	Ongoing
Implementation Responsibility	Department of Public Works and Planning; Department of Public Health
Quantified Objective	Department of Public Health: Annually review 100% of substandard housing complaints received to determine the level of physical investigation required, perform site visits for 80% of legitimate complaints, serve 50% of investigations a notice of violation, and provide to 100% of sites investigated resource information and education

	Department of Public Works and Planning: Initiate the processing of 10 violations by providing information to 100% of the owners of properties in violation of County Codes, Ordinances, and California Building Codes, and assist property owners with the issuance of permits required to abate violations. Conduct outreach related to code enforcement issues during other public meetings at least four times during the planning period.
Relevant HE Policies	3.1, 3.3

Housing Assistance

Program 25: Homeownership Assistance

This program assists lower-income families with purchasing their first home by providing a zero interest, deferred payment loan for the purchase of a primary single-family residence. Households earning up to 80% Area Median Income (AMI) in the unincorporated county and the cities that participate in the County's CDBG/HOME Joint Powers Agreement (County JPA) are eligible for this program. The County will continue to market Homeowners Assistance Program (HAP) to eligible first-time homebuyers and to developers, such as Self-Help Enterprises and Habitat for Humanity, as well as work closely with lenders and the real estate community to ensure the program is made available whenever possible to qualified applicants.

The County will explore other funding sources to assist homeownership, including farmworkers with an individual taxpayer identification number (ITIN) and moderate-income households. These potential funding sources may have different income limits and program requirements. Additionally, the County will:

- Modify HAP to ensure optimal usage in the current and near-future housing markets. Changes to the HAP Program will be completed by December 2025.
- Assess whether HUD's annually-determined home value limits are prohibiting use of Federal funds. If HUD's determined "modest" home values are found to be chilling the use of the programs, the County will perform individualized housing market studies for HUD to address home price disparities between the unincorporated communities and participating cities. Localized market studies may allow greater flexibility in providing assistance by identifying a higher "modest" home value in certain cities and a lower "modest" home value in other communities.
- Continue to review funding resources available from the state and federal government to obtain funds to provide homebuyer assistance.

Fresno County residents have access to numerous state and federal homebuyer assistance programs. The County will continue to educate residents about the programs and layer funding whenever possible. Some possible funding partners and sources include Mortgage Credit Certificate tax credit, and loans from CalPLUS, California Housing Finance Agency (CalHFA), and US Department of Agriculture (USDA).

Financing	HOME Investment Partnerships Program (HOME), CalHOME, California Housing Finance Agency (CalHFA)
Time Frame	Ongoing advertising and distribution of first-time homebuyer resources, including meetings with lenders, realtors, and community groups; annual review of state and federal funding resources Implement changes to HAP by December 2025 Apply for additional funding sources by 2026; secure funding by 2028
Implementation Responsibility	Department of Public Works and Planning
Quantified Objective	Distribute informational brochures concerning first-time homebuyer resources to 5 lending institutions Facilitate the provision of funding for HAP and/or sweat equity (e.g., Habitat for Humanity, Self-Help Enterprises) for 40 prospective homebuyers in unincorporated or incorporated communities throughout the planning period. Apply for and secure funding from at least one additional source for downpayment assistance during the planning period
Relevant HE Policies	2.8, 2.9

Program 26: Housing Choice Voucher Rental Assistance

The Housing Choice Voucher 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 U.S. Department of Housing and Urban Development (HUD) and what a tenant can afford to pay (i.e., 30% of household income). The Fresno County Housing Authority administers the housing choice voucher program in Fresno County. Given the continued need for rental assistance, the County supports and encourages the provision of additional subsidies through the Housing Choice Voucher Program. The County will:

- Continue to support and encourage the provision of vouchers to qualifying Fresno County households.
- Continue to provide a link to the Fresno County Housing Authority's HCV program on the County's website.
- Meet with the Fresno County Housing Authority by <u>June 2024August 2025</u> to discuss the process of developing printed informational materials, with the goal of making materials available at public counters by <u>June 2025February 2026</u>.
- Continue to refer interested households and homeowners to the Fresno County Housing Authority and encourage landlords to register their properties with the Housing Authority for accepting HCVs.

- Work with the Fresno County Housing Authority to identify funding sources for landlord incentives such as security deposits and incentives to increase the number of units assisted throughout the county, but especially in Racially Concentrated Areas of Affluency (RCAA).
- Assist the Fresno County Housing Authority in landlord and tenant outreach and education to promote fair housing opportunities for all unincorporated community residents, especially those in areas of high segregation and poverty.
- Include the various Fresno County Housing Authority programs in the County's directory of housing services and resources and make it available to Housing Authority residents.
- Educate landlords participating in the Housing Choice Voucher Program about the County's Rental Rehabilitation Program.
- Educate HCV recipients that income discrimination is illegal under the Fair Employment and Housing Act, and where they can report potential violations.

Financing	US Department of Housing & Urban Development (HUD) Housing Choice Voucher Program
Time Frame	Meet with the Fresno County Housing Authority by June 2024 August 2025 and develop informational materials by June 2025 February 2026
	Target outreach to property owners and landlords currently participating in the Housing Authority programs at least annually
Implementation Responsibility	Department of Public Works and Planning; Fresno County Housing Authority
	Work with the Fresno County Housing Authority to encourage landlords and property managers in unincorporated and incorporated communities to increase the number of units using Housing Choice Vouchers by five percent
	Participate Annually in the County's housing meeting
Quantified Objective	Inform 100 landlords that participate in the Fresno Housing Authority program annually about the Rental Rehabilitation Program
	Distribute or post 350 flyers annually to community-based organizations, businesses, residents, and/or public facilities in unincorporated areas of high segregation and poverty regarding Fresno County Housing Authority programs
	Coordinate with Fresno County Housing Authority to participate in the annual housing meeting to educate the residents, community-based organizations, and developers about various programs
Relevant HE Policies	Policy 2.2, 2.5

Program 27: Rental Assistance

The County, through DSS, partners with other FMCoC members and community-based organizations to provide rental assistance for families that are homeless or at risk of becoming homeless. During the planning period, the County will continue to:

- Seek funding and renew and/or enter into new contracts with community-based organizations to
 provide case management, housing search and placement, and rental subsidies toward permanent
 housing for clients in rural communities and/or receiving CalWORKs.
- Provide assistance for CalWORKs families experiencing a housing crisis. The CalWORKs Homeless
 Assistance Unit works with CalWORKs eligible clients to assist them with motel vouchers and move
 in costs for those experiencing homelessness.
- Identify potential funding opportunities to provide housing vouchers or other forms of rental assistance with an emphasis on addressing housing needs during the off-season for seasonal workers.

Financing	California Emergency Solutions and Housing (CESH); Homeless Housing, Assistance, and Prevention (HHAP); CalWORKs Assistance Program; CalWORKs Housing Support Program (HSP) Allocation from California Department of Social Services (CDSS); Housing and Disability Advocacy Program (HDAP) Allocation from CDSS; Bringing Families Home Program (BFH) Allocation from CDSS
Time Frame	Ongoing
Implementation Responsibility	Department of Social Services
Quantified Objective	Strive to reduce the number of unsheltered homeless by 10% countywide during the planning period, as compared to the 2023 Point-in-Time (PIT) count
Relevant HE Policies	2.2, 2.4, 4.6

Program 28: Energy Conservation

The County of Fresno will continue to promote energy conservation in housing development and rehabilitation by:

 Promoting Pacific Gas and Electric Company (PG&E) programs that provide energy-efficiency rebates for qualifying energy-efficient upgrades by providing a link on the County website and continuing to refer PG&E programs through the 2-1-1 Helpline.

- Assisting lower-income households with improvements related to energy efficiency through the County's Housing Preservation and Rehabilitation Program.
- Evaluating projects for compliance with the California Building Code, particularly CALGreen (title 24, part 11), the state's mandated green building code.
- Promoting energy efficiency through partnerships with community-based and not-for-profit entities whose mission and experience is focused on expanding solar to low-income and disadvantaged communities, such as the Fresno Economic Opportunities Commission (and their Energy Services Program) or GRID Alternatives; assisting in at least two outreach efforts for the identified entities to inform the residents of the solar programs.
- Continuing to require tree preservation and tree planting during the entitlement process and site plan review to create areas of shade and reduce energy used for cooling and heating.
- Applying for at least one grant and identifying other grants such as CalHOME that allow the rehabilitation of mobile homes in mobile home parks that is not allowed through the HOME Program.
- Providing information on its website related to the Low-Income Weatherization Program (LIWP) of the California Department of Community Services and Development, and specifically its Farmworker Housing Energy Efficiency & Solar PV program. This program provides eligible low-income farmworker households with solar photovoltaic (PV) systems and energy efficiency upgrades at no cost to residents.

Financing	General Fund and grants as allowed
Time Frame	Ongoing
Implementation Responsibility	Department of Public Works and Planning
Quantified Objective	Provide a link on the County website for the PG&E rebate programs by 2024 and continue to refer people to PG&E programs through the 2-1-1 Helpline
	Provide a link on the County website for the State's Low-Income Weatherization Program (specifically the Farmworker Housing Energy Efficiency & Solar PV program) and refer people through the 2-1-1 Helpline
	Utilizing the targeted outreach meetings detailed under Program 23, provide information regarding housing preservation and rehabilitation programs to at least 700 households annually
	As part of regular plan check and permitting processes, enforce the California Building Code regarding CALGreen (Title 24, Part 11), which is the State's mandated green building code, and require as deemed necessary tree preservation and planting
	Invite representatives of the Fresno Economic Opportunities Commission to attend at least three community meetings each year

	Partner with community-based and not-for-profit entities for the promotion of energy efficiency and solar for low-income and disadvantaged communities; assist in at least two outreach efforts to inform residents of the solar programs Apply to at least one grant for the rehabilitation of mobile homes in mobile home parks
Relevant HE Policies	6.1, 6.2, 6.3
Relevant HS Policies ¹	HS-G.4 (Climate Pollution Reduction Practices for Income-Qualified Homes), HS-G.5 (Cooling Centers)

Note 1: The health and safety (HS) policies referenced are from the 2024 General Plan

Fair Housing

Program 29: Fair Housing Monitoring, Outreach, and Referral

Impediments to fair housing in Fresno County are identified in the County's Analysis of Impediments (AI) to Fair Housing, which was most recently submitted and accepted by the U.S. Department of Housing and Urban Development (HUD) in May 2010. It was most recently reviewed in May 2015, and will be updated again following adoption of the Sixth-Cycle Housing Element. The geographic area covered by this document includes the unincorporated county and partner cities participating with the County in its Joint Powers Agreement for HUD's Urban County Program.

Impediments to fair housing choice in Fresno County's Urban County HUD program area included in the AI are: affordability, accessibility, education, public policies, and language barriers. The County focuses available federal HUD grant resources toward mitigating these impediments through its housing programs and services. To address the impediments of accessibility and affordability, the County continues to provide its federal housing funding toward the construction of new affordable housing, toward the rehabilitation of existing affordable housing, and toward direct assistance to low and moderate-income first-time homebuyers to purchase an affordable home.

To address impediments related to language barriers and public policies, the County makes efforts to provide material regarding its housing programs in the language of the intended population (English/Spanish), including: marketing materials, educational materials and public hearing notifications and publishing. The County makes effort to hire and retain staff that are bilingual (either English/Spanish or English/Hmong) to implement the County's affordable housing programs. Additional language access needs are met through County agreements for interpreting and translation on an as-needed basis. Public meetings on housing issues are frequently conducted in two languages depending upon the predominant language of the target audience. Further, the County will translate all Community Development housing program application materials into Spanish by <u>December 2025June 2026</u>.

The County refers complaints on fair housing to the Fair Housing Council of Central California (FHC-CC), which is the local regional agency which investigates and litigates fair housing issues. As appropriate, FHC-CC may further refer complaints to HUD or to the State Department of Fair Employment and Housing.

The County will be contracting with an agency already receiving funds from HUD's Office of Fair Housing and Equal Opportunity (FHEO) by December 2024 to support outreach, education, and compliance efforts promoting fair housing. These services provide opportunities for County residents to have affordable housing choices, provide residents with information and skills to maintain their affordable home and enable residents to be aware of housing discrimination laws and understand where to report such issues. Materials currently presented at workshops include publications of the FHC-CC. These programs and services are all intended to help mitigate impediments to fair housing as directed by HUD.

As part of the County's ongoing General Plan Review process, a new Environmental Justice theme and Environmental Justice Element has been included as part of the General Plan. This action will result in new policies and programs that express the County's commitment to create opportunities for every resident to live in health and safe communities regardless of race, color, national origin, or income, and to create opportunities for meaningful community involvement in the development of laws and regulations that affect every community's natural surroundings, and the places people live, work, play and learn.

To support environmental justice and fair housing, the County will:

- Provide residents within disadvantaged unincorporated communities the opportunity to review and comment on discretionary development projects within their community.
- Partner with local agencies and non-profits to conduct periodic workshops in disadvantaged communities to engage area residents regarding Fresno County programs and projects (e.g., health services and healthy foods, HOME program, and infrastructure projects).
- Ensure that residents of disadvantaged communities are provided the opportunity to participate in discussions that may direct decisions that have an adverse impact to their health, to the extent feasible.
- Ensure the accessibility of community meetings by ensuring that all meetings are held at times and in manners (e.g., virtual, in-person) that are most accommodating to the community members most affected, to the extent feasible.
- Consider the diversity of its residents when developing noticing and outreach materials for community meetings to ensure pertinent information is equitably dispersed and simply understood.
- Provide CDBG funds to an agency already receiving funds from HUD's FHEO to perform more education activities (for landlords, tenants, and advocates) and to conduct additional enforcement testing of fair housing laws in the rural areas and partner cities.
- Require future contractors and subrecipients providing housing services to submit records reflecting completion of civil rights and fair housing training; and educate existing subrecipients and contractors on the existing laws for civil rights (nondiscrimination) and fair housing.

- Continue to refer residents with fair housing questions or issues to HUD, State Department of Fair Employment and Housing, the Fair Housing Council of Central California (FHC-CC), California Rural Legal Aid (CLRA), and other fair housing organizations.
- Continue to provide printed fair housing information to the County libraries, Community Services District offices, partner cities, at public counters throughout various County offices in both English and Spanish, as well as digital versions of this information on the County's website.

Financing	Community Development Block Grant (CDBG)
	Either individually or as part of the Countywide Housing Element Working Group (Program 1), meet annually with FHC-CC to discuss fair housing issues and opportunities for education
	Make fair housing information available on the County website and in public buildings by June 2025
	Translate 100% of Community Development housing program application forms into Spanish by <u>2025June 2026</u>
Time Frame	Contract with an agency already receiving funds from HUD's FHEO and coordinate with other fair housing providers to conduct workshops, meetings, and outreach activities/mailings throughout the planning period, with activities spread out so that at least three activities (from those listed in the quantified objectives) are conducted each year
	Review and update Analysis of Impediments to Fair Housing Choice by 20252026
	Review and update Affirmative Fair Housing Marketing Plan by 2025-2026
	Refer complaints on fair housing to HUD, State Department of Fair Employment and Housing, FHC-CC, and other housing agencies as received
Implementation Responsibility	Department of Public Works and Planning; Countywide Housing Element Technical Committee; Fresno County Housing Authority
Quantified Objective	Conduct at least 6 in-person and 6 virtual outreach and education workshops, 12 community meetings, and 15 outreach activities throughout the planning period
	Conduct media engagement including mailings of at least 5,000 educational and informational flyers (in tandem with advertising workshops, meetings, or outreach activities as appropriate), during the planning period
	Update the County's Affirmative Fair Housing Marketing Plan to focus mailing and communication to communities consistent with other programs in the Housing Element related to addressing contributing factors related to fair housing
	Coordinate outreach and meetings with update to Analysis of Impediments to Fair Housing Choice

	Translate 100% of Community Development housing program application forms into Spanish by <u>2025June 2026</u>
	Mail a written notice to property owners and occupants within 15 days of the County's acceptance of a discretionary development review application located within a disadvantaged community. Notification shall be in English and Spanish and shall provide the opportunity for residents to submit written comments within 15 days following the date of the notice. Notification shall be from the exterior boundary of the property proposed for development and shall be in accordance with the Fresno County Zoning Ordinance public noticing requirements
Relevant HE Policies	5.1, 5.2
Relevant EJ Policies ¹	EJ-A.8 (Community Input on Development Projects), EJ-E.1 (Engage Disadvantaged Communities), EJ-E.2 (Participation in Decision Making Process), EJ-E.3 (Meeting Accessibility), EJ-E.4 (Community Noticing and Outreach)

Note 1: The environmental justice policies referenced are from the 2024 General Plan.

Program 30: Access to Education

Contributing factors to the barriers experienced by lower-income residents include disparities in access to services and resources. This contributing factor is characterized by the following:

- Low-scoring school performance in unincorporated communities
- Uneven spatial distribution of high-performing schools in relation to lower-income communities and limited school facilities in the unincorporated county.

The Fresno County Office of Education serves 32 school districts with approximately 200,000 students countywide and serves as a safety net for students with special needs by offering services for migrant, community school, and special education students. The Office of Education manages the Fresno Regional Occupational Program (ROP), which provides students the opportunity to explore their interests, develop career skills and reinforce academics through career technical education. The ROP offers technical education regarding agriculture and natural resources, arts, media and entertainment, building and construction trades, education, child development and family services, energy, utilities, engineering and architecture, fashion and interior design, finance and business, health science and medical technology, hospitality, tourism and recreation, information and communication technologies, manufacturing and product development, marketing, sales and service, public services, and transportation. The ROP also offers students a range of educational benefits, including: college credit for qualifying courses, industry certification, and internships when available.

The County will support Fresno County Office of Education by providing outreach to unincorporated communities, holding workshops with FCOE staff at community meetings regarding classes offered, and increasing participation in adult classes across Fresno County.

The County will also meet with school districts in the communities of Del Rey, Riverdale, and Biola during the Community Plan Update process to determine what, if any, outside factors impede student performance that can be alleviated, such as: stable housing opportunities, childcare opportunities for working parents, and more. In addition to serving Biola, Central Unified School District also serves the West Fresno sites identified in the County's sites inventory. If such a need for such a program or specific issues are identified, the County will work collaboratively towards solutions, which may include:

- Reviewing the Zoning Ordinance to ensure childcare facilities are permitted in close proximity to schools and employment centers;
- Meeting with developers to identify the need for sites suitable for housing affordable on a teacher's salary;
- Facilitating discussions between school districts and transit agencies to increase the availability of bussing and transportation, as needed, for students to/from school, childcare, or athletic events; and
- As requested, support school applications for grants that may be used for teacher recruitment and retention bonuses, providing classroom materials, and other similar incentives to attract high-quality teachers.

Financing	State and federal education funds, General Fund
Time Frame	Ongoing; workshops, coordination, and support throughout planning period
Implementation Responsibility	Fresno County Office of Education, Department of Public Works and Planning
Quantified Objective	Fresno County will assist FCOE in conducting outreach and workshops in unincorporated communities in the western part of Fresno County including Biola, Del Rey, & Riverdale from 2024 to 2026 in an attempt to increase participation in ROP by 10% every year.
	Fresno County will meet with school districts serving Del Rey, Riverdale, and Biola during the Community Plan Update process (see Program 33 for timing) and concurrently with the Central Unified School District regarding the West Fresno sites, with follow up actions to take place in an ongoing and on-demand manner.
Relevant HE Policies	5.1

Program 31: Access to Employment

In the western portion of Fresno County, disadvantaged unincorporated communities (DUCs) face disparities in accessing services and resources due to the concentration of employment opportunities and services in or adjacent to incorporated areas. The County is committed to addressing the lack of accessibility and high poverty to rural residents during the planning period through the following actions:

- The County will update its Comprehensive Economic Development Strategy (CEDS) during the planning period. The County plans to create a digitally integrated CEDS allowing data to be periodically updated. The County's CEDS will cover the unincorporated county, and 14 of 15 cities in Fresno County, the City of Fresno is the only city not included. The County's CEDS will be a strategy-driven plan for regional economic development designed to build capacity and guide economic prosperity and resilience in the County and will include a strengths, weaknesses, opportunities, and threats (SWOT) analysis. The CEDS includes a summary background of the economic conditions of the region. Development of the digitally integrated CEDS will include a process for residents, organizations, local governments, institutes of learning, and private industry to engage in meaningful conversation and debate about what capacity-building efforts would best serve economic development. The County will conduct outreach and encourage participation from the western county communities to identify economic development strategies to address the high concentration of poverty. The CEDS is a strategic document required to receive funding from some U.S. Economic Development Administration (EDA) programs at the city and county levels. The CEDS document will be used to support applications for other state and federal funding sources.
- DSS will encourage successful completion of Cal-Learn program for pregnant or parenting teens, which
 provides them with the necessary childcare and transportation support to earn a GED or high school
 diploma.
- DSS will encourage Welfare to Work (WTW) or CalFresh Employment and Training (CFET) participation for adults receiving CalWORKs and/or CalFresh to obtain employment by identifying clients' strengths; establishing obtainable goals; and providing assistance with training education, and job placement opportunities. Supportive services are available to reduce barriers to employment such as: lack of childcare or transportation, substance abuse, domestic violence, legal impediments, or mental health issues.
- The Economic Development Corporation (EDC) partnered with DSS to develop employment
 opportunities for County residents including the administration of the New Employment Opportunities
 (NEO) Program. Through this collaboration, EDC and DSS can offer employers who hire DSS WTW
 clients throughout the county assistance with employee recruitment, screening, training, retention
 services, and wage subsidies.
- EDC, through the Fresno EOC Valley Apprenticeship Connections (VAC) Program, supports the hiring
 needs of the Central Valley's construction contractors with an intense 12-week training program to
 prepare students for the workforce. VAC participants receive common skills attainment, daily physical
 activity, construction math, industry-recognized certifications, and meet and greet introductions.
 Planning meetings to determine skills training, site(s), and potential employment opportunities offering
 high-quality careers will begin in the fall of 2023 in the western part of the County with an estimated
 start in January 2024.
- The Department of Public Works and Planning will provide focused outreach regarding these programs to targeted communities, 80% of which will be Disadvantaged Unincorporated Communities (DUCs)

annually to encourage participation in these and other programs. The County will utilize the County's Unincorporated Community Plans Update Prioritization list to determine which communities to focus on annually. The County will focus on Del Rey in the first year of the planning period.

- Fresno DRIVE's Fresno-Merced Future of Food Innovation (F3) Initiative will fund a Climate-Smart Agrifood Technology and Engineering Cluster based on capabilities in digitalization and data science, mechatronics, equipment, and systems testing and integration for agrifood applications. F3's Five Projects include F3 innovation, Local Farm & Food Innovation, AgTEC Workforce Initiative, Opportunity Walkway, and Partner Integration & Collective Impact. The Goal of F3 Innovation is to establish 75 industry-academic partnerships, developing 100 agricultural technological innovations, of which 40% will be commercialized. Attract \$250 million non-public sector capital dollars and coordinate 3,500 new research and job opportunities, including 2,500 created for Black Indigenous, and People of Color (BIPOC), low-income students, and incumbent workers. The goal of AgTEC is to nearly double the annual workforce pipeline to over 8,400 job-ready workers in four years, enabling an increase in average wages of 60% for the workforce.
- The Department of Public Works and Planning will assist the Central Valley Community Foundation with outreach for their Fresno-Merced Future of Food Innovation (F3) Initiative by promoting job opportunities to BIPOC, low-income students and incumbent workers in western Fresno County when available and perform outreach for competency-based education (CBE) curriculum in participating community colleges at the planned commencement of Fall 2024 with the goal of enrolling 10 students from DUCs in western Fresno County.

Financing	CalWORKs Single Allocation, Supplemental Nutrition Assistance Program Employment and Training (SNAP E&T) Allocation, various US Economic Development Administration (EDA) funding sources
Time Frame	Ongoing
Implementation Responsibility	Economic Development Corporation, Department of Social Services, Department of Public Works and Planning
Quantified Objective	Update the CEDS by 2025, conduct at least two community meetings in disadvantaged communities in western Fresno County, with a priority focus on Del Rey, Riverdale, and Biola Department of Social Services will continue to advocate for 300 employment opportunities per contract year and 100 new active job placements per year to empower clients to transition to self-sufficiency From 2024 to 2026, annually train and place 60 participants in rural regions of the County through the VAC program The Department of Public Works and Planning will assist the Central Valley Community Foundation to enroll 10 students from DUCs in western Fresno County in the newly formed AgTEC training with local Community Colleges by 2025

	The Department of Public Works and Planning will distribute or post 500 informational flyers and provide 50 referrals annually during the planning period with 80% of the outreach to disadvantaged communities with a concentration in western Fresno County for all these programs
Relevant HE Policies	Policy 4.6, Policy 5.1

Program 32: Improving Accessibility and Safety on Roads and Streets

Contributing factors to the barriers experienced by lower-income residents include low transit connectivity. The County will update the existing Local Road Safety Plan to include measurable outputs and outcomes for implementing safety countermeasures, create a task force of internal and external stakeholders to develop and monitor the plan, and assess current policies and processes to ensure accountability, identify priorities and improve processes. Through this, the County will seek to improve accessibility to disadvantaged communities and groups, including farmworkers and the disabled, through the following:

- Propose to the Board of Supervisors to add measurable goals and objectives to the Local Road Safety Plan.
- Hold regular public meetings, accessible in-person and online, to discuss and monitor progress on road, pedestrian, and bicycle safety to provide all residents, including those in disadvantaged communities, an opportunity to engage actively on issues that affects them.
- Collaborate with community-based organizations and residents from disadvantaged communities, including the disadvantaged communities listed on Table EJ-1 of the General Plan Environmental Justice Element to identify road improvements.
- Focus active transportation efforts in the communities of: Calwa, Malaga, Cantua Creek, Tranquillity, Del Rey_a Biola, and Riverdale.
- Continue to apply for grants to fund new and improved walking, biking, and rolling access for individuals with disabilities.
- Give priority to disadvantaged communities when seeking infrastructure and active transportation funding opportunities.
- Coordinate with Caltrans to encourage development of projects to mitigate roadway pollution along major interstates, such as the development of green barriers near existing sensitive land uses.
- Collaborate with and encourage the City of Fresno (Fresno Area Express) and Fresno County Rural Transit Agency to solicit input from disadvantaged communities with the goal of identifying the need for potential new routes to healthcare facilities, employment centers, and shopping outlets that provide access to healthy foods, including fresh produce and proteins.
- Increase coordination efforts between Fresno County Rural Transit and Fresno County to include, as determined necessary, bus stops and other improvements when reconstructing rural roads.

• When appropriate, implement Complete Streets design guidelines on a project-by-project basis to improve transportation safety and efficiency.

Financing	Safe Streets for All Action Plan Grant (SS4A), Department of Public Works and Planning Road Fund, Active Transportation Program, Measure "C" Urban and Rural Trails, Americans with Disabilities (ADA) funds, Highway Safety Improvement Program					
Time Frame	Complete Action Plan by December 2027 Design, fund, and construct sidewalk improvements by the end of 2030					
Implementation Responsibility	Department of Public Works and Planning					
Quantified Objective	The County will invest over \$10 million to construct 7.5 new miles of sidewalks and reconstruct 2.4 miles of sidewalks to include gutters, 120 new ADA ramps, the reconstruction of 41 ramps not up to date with ADA requirements in the disadvantaged unincorporated communities of Del Rey, Tranquillity, and Calwa by November 2030.					
	Continue to apply for funding, when possible, to improve transit connectivity and safety and give priority to DUCs and West and Southeast Fresno sites.					
Relevant HE Policies	1.7, 3.5					
Relevant EJ Policies ¹	EJ-A.6 (Caltrans Coordination), EJ-A.11 (Prioritization of Improvement and Programs), EJ-B.1 (Access to Services), EJ-B.2 (Encouraging Outdoor Activity), EJ-B.3 (Safe Routes to School), EJ-B.4 (Bicycle Facilities), EJ-B.5 (Bicycle Routes), EJ-B.6 (Parks and Trails Quality), EJ-B.8 (Rural Complete Streets)					

Note 1: The environmental justice policies referenced are from the 2024 General Plan.

Program 33: Improving Housing Options

Contributing factors to the barriers experienced by lower-income residents also include displacement risk resulting from overcrowding and disproportionate need for safe and affordable housing options. This is particularly true for extremely low-income households living in rural communities. These contributing factors are characterized by the following:

- High overall cost of housing.
- Limited range of available housing types.
- Dominance of single-family housing, which is typically a more expensive housing option.

The County, consistent with state law, already permits accessory dwelling units (ADUs) and junior accessory dwelling units (JADUs) to be permitted as a matter of right on any residentially zoned parcel, excluding parcels located within designated Low Water Areas and parcels less than two acres in size that

are only served by well and septic systems. Further, the County will provide pre-approved Standard Plans for the construction of ADU, duplex, triplex and fourplex housing to any individual or developer proposing to construct such housing units within Fresno County, reducing development costs and increasing design approval certainty.

The County will promote a greater variety of affordable housing options, particularly for extremely lowincome households, by exploring as a part of Community Plan updates where zoning could be amended to permit duplex, triplex and fourplex housing based on community desire, development interest, and infrastructure capacity.

The County will provide flyers informing eligible communities about those Standard Plans and provide guidance regarding the plan check and permitting processes for the construction of an ADU, duplex, triplex and fourplex dwellings.

The County will apply for state and federal grants and work with local credit unions and banks to identify funding opportunities for construction of ADU, duplex, triplex and fourplex housing within eligible areas. Additionally, the County will pursue state and federal grant opportunities to update Community Plans to streamline the permitting of ADU, JADU, duplex, triplex and fourplex dwellings within the identified Community Plan areas. This streamlining may include the abandonment of alleyways to re-purpose such spaces as developable land for housing units, as was recommended by a member of the public during a community outreach meeting conducted within Biola in June 2023.

The County of Fresno, through the Department of Internal Services and the County Administrative Office, is seeking funding to provide affordable high-speed internet availability to underserved unincorporated residents in Fresno County. The County will also continue to explore the possibility of applying for grants to fund new internet infrastructure and partner with internet providers and meet to discuss grant opportunities to expand access to affordable high-speed internet in underserved unincorporated rural communities.

The County will further expand housing options by evaluating and revising its permitting process and zoning to for licensed and unlicensed care facilities serving seven or more in every residential zone. This includes amending the Zoning Ordinance to clarify that such facilities are permitted in every residential zone with a conditional use permit. The County will also evaluate whether the conditional use permit processeor and parking standards processes create as a constraints to the development of residential care facilities that serve seven or more residents based on timing, cost, and approval certainty. For example, parking requirements may be refined by type of care facility based upon typical car usage rates of the occupants rather than by amount of building space and number of employees. This evaluation will include soliciting feedback from developers of residential care facilities. If the County determines that either or both are a constraint, tThe County will amend the Zoning Ordinance as needed. The intent is to reduce unnecessary parking requirements and streamline the permitting process by subjecting residential care

facilities only to objective standards. The County will also amend, if necessary, the population density for unlicensed care facilities serving seven or more.

Finally, to allow for larger units in areas zoned R-2A and R-3A that are currently limited to one story buildings, the County will work with community members to identify areas where heights above one story have local support and can be served by available firefighting equipment. Where appropriate, the County will rezone to allow for two-story buildings (while retaining the "A" suffix) or rezoning the parcels from R-2A or R-3A to R-2 or R-3 to allow three story buildings. Finally, the County will amend the Zoning Ordinance to remove the constraint of a single-story limitation due to existing maximum building height standards in areas zoned R-2A. Maximum permitted building heights will be increased from 20 to 25 feet in the R-2A zone, thereby allowing two-story buildings. The County will also eliminate the R-3A zone, which is not currently applied to any parcel in the county, ensuring that any future development associated with the higher density of the R-3 zone can build up to 40 feet in height.

Financing	General Fund, Local Early Action Planning (LEAP), Regional Early Action Planning (REAP), state and federal grant funds for internet connectivity					
	Obtain Plan Check approval of Standard Plans by December 2024; annually distribute flyers beginning in 2024					
	Collaborate with local credit unions and banks in 2025 to fund the construction of ADU, Duplex, Triplex, and Fourplex					
	Identify state and federal grant opportunities for funding ADU, Duplex, Triplex, and Fourplex by 2025					
	Identify state and federal grant opportunities for Community Plan updates in 2025; update one community plan by 2027, a second community plan by 2028, and a third community plan by 2030					
Time Frame	Amend the Zoning Ordinance to clarify that facilities serving seven or more in residential zones are permitted in every residential zone with a conditional use permit. Evaluate parking and conditional use permit requirements as constraints for facilities serving seven or more in residential zones, including by meeting with residential care facility developers and operators, in 2025to determine whether parking and conditional use permit processes are a constraint to the development of these facilities. If the County determines that either or both are a constraint, mModify the Zoning Ordinance to remove identified constraints by June 2026 5 .					
	Evaluate and coordinate with residents in communities during the Community Plan updates to identify where heights above one story have local support and can be served by available firefighting equipment. As appropriate, rezone to Amend the Zoning Ordinance to allow for-two story buildings and increase the maximum height to 25 feet (while retaining the "A" suffix) or rezone parcels from in the R-2A zoneor and remove the R-3A zone to R 2 or R 3 to allow three story buildings by 2025.					
	Adopt zoning changes within one year of Community Plan updates					

	Apply for grants and facilitate expansion of access to high-speed internet by 2031					
Implementation Responsibility	Department of Public Works and Planning, Department of Internal Services, County Administrative Office					
	Annually inform 250 farmworkers either by social media or distribute, mail, and/or post 200 flyers or through community partners					
	Permit 15 ADUs and 5 duplex, triplex or fourplex projects during the planning period					
	Complete three Community Plan updates during the planning period (Del Rey, Riverdale, Biola)					
	Adopt zoning changes related to duplex, triplex, and fourplex dwellings within appropriate Community Plan areas and					
Quantified Objective	Amend the Zoning Ordinance to clarify that facilities serving seven or more in residential zones are permitted in every residential zone with a conditional use permit. Adopt zoning changes to remove constraints posed by parking standards and the conditional use permit process for residential care facilities serving seven or more in residential zones throughout the unincorporated county					
	Apply for at least two grants and coordinate with internet providers to fund the expansion of affordable high-speed internet access to disadvantaged unincorporated rural communities.					
	Expanded access to high-speed internet for 3,000 households					
Relevant HE Policies	1.2, 11.7, .8, 2.1, 2.3, 2.6, 2.7, 3.5					

Program 34: Racially Concentrated Areas of Affluence (RCAA)

Another contributing factor to the barriers experienced by lower-income residents is the presence of Racially Concentrated Areas of Affluence (RCAA). This contributing factor is characterized by a proximity to higher paying job opportunities in the incorporated cities of Clovis, Fresno and Sanger, and fewer farmworker jobs.

The County will make efforts to market to developers the sites that are rezoned for RHNA purposes in order to diversify high income RCAA areas with lower-income households. In doing so, the County will facilitate the construction of one multifamily development within proximity to the incorporated cities of Clovis or Fresno during the planning period. This includes the sites identified for rezoning in census tract 54.01 in the Southeast Fresno SOI—see Tables 1A-8 and 1A-21.

As detailed under Housing Element Program 17, Affordable Housing Incentives, the County will continue to offer incentives to facilitate the development of 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

APPENDIX 1A: COUNTY OF FRESNO

at risk of becoming homeless. Examples of incentives include gap financing, County and state density bonus provisions, and streamlined processing (such as pre-application consultation to identify potential issues early on and concurrent processing of required permits to the extent feasible). These incentives can be applied to sites in census tracts designated as a RCAA and high/highest opportunity areas. Additional programs that directly or indirectly address farmworker assistance include Programs 17, 18, and 35.

Financing	General Fund					
Time Frame	Entitlements for first affordable housing development in a RCAA by 2026, second by 2028, and third by 2030 Advertise RHNA sites annually and throughout the planning period					
Implementation Responsibility	Department of Public Works and Planning					
Quantified Objective	Provide technical assistance and support to developers and/or other agencies to facilitate one affordable housing developments during the planning period in a census tracts identified as a RCAA, either on unincorporated land (that may be annexed concurrent with entitlement) or in a city					
	Advertise the RHNA sites available for development annually during the annual housing meetings					
Relevant HE Policies	5.1, 5.3					

Program 35: Housing for Farmworkers

Contributing factors to the barriers experienced by lower-income residents also includes the large presence of lower-income farmworkers. This contributing factor is characterized by the following:

- High unmet need for farmworker housing, which is often in poor condition and overcrowded.
- Farmworkers cannot afford market-rate housing.
- High rates of poverty and communities of color among farmworker populations.

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 County will:

- Actively partner with HCD and the UC Davis Western Center for Agricultural Health and Safety on their upcoming California Farmworker Housing Study, which is being conducted to fulfill the requirements of AB 1654 (2022).
- Continue to seek partnerships and regularly meet, at least annually, with other agencies (such as the Fresno County Housing Authority), housing developers, community stakeholders, and agricultural

employers/employees to discuss opportunities and potential sites suitable for new housing for farmworkers, as well as existing farmworker housing developments that are in need of rehabilitation and preservation.

- Explore incentives such as: expedited permit processing, plan checking, and inspections to encourage and facilitate the development of housing for farmworkers in the unincorporated county.
- Continue to support and encourage other agencies and housing developers, such as the Fresno County Housing Authority and Self-Help Enterprises, in the application of funds for housing for farmworkers, including: State HCD's Joe Serna Jr. Farmworker Housing Grant Program, USDA Rural Development loans and grants, and other funding sources that may become available.
- Outreach to farmworkers to make sure they are aware of new and existing affordable housing opportunities.
- Conduct targeted proactive code enforcement every other year to property owners that are known to
 provide housing to farmworkers and connect them with home rehabilitation resources (see Program 23)
 to improve housing conditions for this segment of the community.
- Require multifamily development that are funded through County programs to include specific outreach efforts to inform farmworkers about their housing developments in the required Fair Housing Marketing Plan. County staff during their annual monitoring is to review the marketing efforts that were conducted.
- Develop a directory of housing services and resources available in the region for lower-income households. The directory will include a chapter detailing housing services and resources that are specifically available to farm workers. Create a Quick Response (QR) code for easy access to the document.
- Monitor the housing needs of farmworkers by meeting with appropriate agencies and farmworkers and evaluate the status of farmworker housing as part of the County's annual report to HCD on Housing Element progress and evaluate if County efforts are effective in facilitating the provision of housing for farmworkers. If appropriate, make necessary changes to enhance opportunities and incentives for developing housing for farmworkers.
- Evaluate and pursue opportunities to integrate units reserved for farmworker households, as allowed by funding, into affordable housing developments developed in connection with Programs 17 and 18.

Financing	General Fund, US Department of Agriculture (USDA)
Time Frame	Meet with agencies, housing developers, community stakeholders, and agricultural employers/employees on an annual basis to discuss farmworker housing needs; 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. Proactive code

	enforcement for properties renting to farmworkers and connecting property owners to rehabilitation resources every other year.		
Implementation Responsibility	Department of Public Works and Planning		
	Annually meet with agencies, housing developers, community stakeholders, and agricultural employers/employees to discuss farmworker housing needs		
	Distribute the resource directory to 200 farm workers and to agencies that provide services to farmworkers annually		
Quantified Objective	Facilitate one new affordable housing development in areas of concentrated need for farmworkers in the unincorporated county or a city that participates in the County's CDBG/HOME Joint Powers Agreement (County JPA); integrate units reserved for farmworker households as allowed by funding		
	Facilitate the rehabilitation and preservation of 1 existing farmworker housing development to reduce displacement risk and facilitate place-based revitalization in the unincorporated county or its partner cities		
Relevant HE Policies	1.2, 2.1, 2.3, 2.4, 2.5, 4.1, 4.2, 4.3		

Quantified Objectives

The Housing Element must contain quantified objectives for the maintenance, preservation, improvement, and development of housing based on needs, resources, and constraints. Table 1A-1 shows the quantified objectives for the 2015-2023 Housing Element planning period. These quantified objectives represent targets. They are not designed to serve as minimum production numbers but are estimates based on prior experience, anticipated funding levels, and expected housing market conditions.

Program	Extremely Low ¹	Very Low	Low	Moderate	Above Mod	Total	
RHNA	353	353	391	370	883	2,350	
New Construction	New Construction						
6. Perm Supportive Housing		75 units					
14. Adequate Sites ²		1,097 units		370 units	883 units	2,350	
15. Lot Consolidation/Splits			5 developments	3		5	
17. Afford Hsng Incentives	1 MF devt u	ninc / 2 in p	oartner cities			3	
33. Improving Housing Opts			s/200 flyers; rojects, 3 CPs			250/200/15/5/3	
34. RCAA	1	developmen	nt			1	
35. Housing Farmworkers	1	developmen	nt			1	
Rehabilitation							
7. Room & Board	Improve 50	units / Educa	ate 20 people			50/20	
18. Extremely Low-Income	12 units					12	
23. Housing Pres & Rehab	2 (UCP); O	55 units (HARP/RRP), 133 hh/700 ppl (LEAD), 2 (UCP); Outreach 500 hh/yr; 150 hh w/child/yr; 2 Spanish and 3 bilingual media campaigns: 1 grant					
24. Code Enforcement	10 substanda	10 substandard housing violations; 100% review and information					
Assistance, Conservation,	or Preservati	on					
 Reduce Homelessness & Rental Assistance 	<10% cc	ompared to 2	2023 PIT			<10%	
4. Homeless Needs	+2 c	ommunities	evaluated in an	nnual PIT cour	nts	+2 comm	
5. Access/Transform Health	Assist 350 &	enroll 200	people per yr			350/200	
8. Housing Nav/Linkages	Serve 1,000	/ linkages 6	0% clients/yr			1,000/600	
9. Scattered Site Leasing		+7 units				7	
10. Housing Coord/Cons	Assist 300 people					300	
11. Recovery Housing	+15 units				15		
12. Youth Homeless	Assist 100 youth					100	
13. Seniors/Disabilities	Attend 3 community meetings per year				3		
16. Infrastructure/Services	3 wastew	3 wastewater/water extensions; 13 improvement projects; 100% service providers informed				3/13; 100%	
19. Preservation of At-Risk	9 units					9	

Table 1A-1: Quantified Objectives Summary

Program	Extremely Low ¹	Very Low	Low	Moderate	Above Mod	Total
25. Homeowner Assist			AP/sweat equit funding source			5/40/1
26: Housing Choice Vouchers		%; 100 land to areas of	llords/yr, high seg/pov			+5%/100/350
28. Energy Conservation			ough Prog. 23; 3 orts; 1 grant for	•	U I ·	700/3/2/1
32. Improving Accessibility	7.5	7.5 mi new and 2.4 mi reconstructed sidewalk, 120 new and 40 reconstructed ramps				
35. Housing Farmworkers		Resource directory to 200 workers/agencies; 1 development				
Affirmatively Furthering I	Fair Housing					
29. Monitor, Outreach, Refer	6 virtual/6 in-person wrkshps, 12 mtgs, 15 acts; 5,000 flyers; 100% housing program applications in Spanish					6/6/12/15; 5,000/100%
30. Access to Education		+10%				
31. Access to Employment	CEDS update/2 mtgs; 300 emp opps/yr & 100 job placements/yr; Train 120 ppl; +10 students; 500 flyers & 50 referrals					2;300/100; 120/10/500/50
See also Programs 5, 16, 23, 26, 32, 33, 34, 35 listed above.						

Table 1A-1: Quantified Objectives Summary

Notes:

1. While the RHNA methodology and allocation does not provide a figure for extremely low-income households, state law directs the County to address the existing and future housing need for extremely low-income households. The projected future need can be estimated at one-half of the County's very low-income RHNA allocation or 353).

2. Future projections of development and capacity are permitted by HCD to be grouped for extremely low-, very low-, and low-income categories (collectively called "lower-income").

SECTION 1A-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.

Fifth-Cycle Housing Element RHNA

Assembly Bill (AB) 1233 was signed into law on October 5, 2005, and applies to housing elements due on or after January 1, 2006. Specifically, the law states that if a jurisdiction fails to provide adequate sites in the prior planning period, within one year of the new cycle, the jurisdiction must rezone/upzone adequate sites to accommodate the shortfall. This requirement is in addition to rezoning/upzoning that may be needed to address the Regional Housing Needs Allocation (RHNA) for the new cycle. As part of its 2015-2023 Housing Element, no rezoning was required to accommodate lower-income and moderate-income housing to meet this requirement, even after subtracting capacity from the Friant Ranch Specific Plan. Accordingly, no carryover of units from the Fifth-Cycle Housing Element planning period is required during the Sixth-Cycle Housing Element.

Sixth-Cycle Housing Element RHNA Analysis

Regional Housing Needs Allocation

The RHNA is the state-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 County of Fresno is in the region covered by the Fresno Council of Governments (FCOG). HCD allocated FCOG a Regional Determination of 58,298 units for the Sixth-Cycle RHNA planning period (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 an RHNA methodology for allocating the Regional Determination to each city and county. This methodology must further specify 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 County of Fresno'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 October 2022. In accordance with FCOG's Regional Housing Needs Plan, the County must accommodate a total of 2,350 housing units between July 30, 2023, and December 31, 2031. Table 1A-2 shows the City's RHNA by income category. Of the 2,350 total units, the County must plan to accommodate 706 units for very low-income households, 391 units for low-income households, 370 units for moderate-income households, and 883 units for above moderate-income households. The County will address its RHNA through a combination of planned and entitled units, projected trends in manufactured and rural single-family homes, and vacant parcels with appropriate zoning and access to infrastructure to facilitate development during the planning period.

Table 1A-2: Regional Housing Needs Allocation, 2023-2031

Income Category	Allocation	Percentage
Very Low ¹	706	30%
Low	391	17%
Moderate	370	16%
Above Moderate	883	38%

Note 1: The County assumes 50% of the very low-income units to reflect extremely low-income need.

Planned and Entitled Units

The County first analyzes projects that are already planned and/or entitled for residential development and are expected to be built during the planning period. These projects represent individuals and companies that have already committed significant time and money into securing the right to build housing soon.



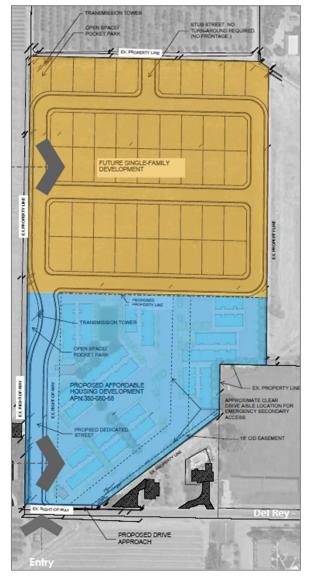
Willow Heights Affordable Apartments

The County is processing an affordable housing development in the community of Riverdale. The developer, Willow Partners, is proposing a two-phase multifamily development on a 7.4-acre parcel next to Fipps Primary School and State Foods Supermarket.

The first phase is 62 units on 4.8 acres of the 7.4-acre site (density of 12.9 units per acre), with a mix of 10 one-bedroom, 28 two-bedroom, and 24 threebedroom units serving lower-income families. Buildings will be in the style of two-story garden style apartments and site amenities will include a children's play area, pool, community room with a kitchen, and computer vestibule. The property will be professionally managed and include an onsite manager's unit. Entitlement for the first phase is expected in 2025/2026 with occupancy expected by 2027/2028.

The remaining 2.5 acres of the site is planned for a second phase, consisting of 32 units in the same style, unit mix, and affordability. The developer anticipates that this phase will be constructed and completed during the planning period.

Willow Partners builds and maintains over 1,000 units of affordable apartments throughout the state, including other properties in the cities of Huron and Kerman. Affordability for both phases will be secured by one or more funding sources, including tax credit funds, USDA, the Joe Cerna Farmworker Housing Grant program, HOME, or the Permanent Local Housing Allocation Program (PLHA).



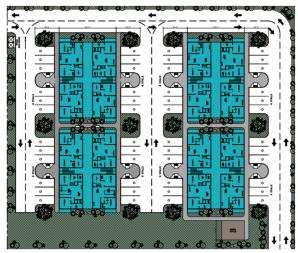
Del Rey Family Housing

The County is processing an affordable housing development that is being proposed by the Fresno County Housing Authority in the community of Del Rey. The multi-phase project will be built on an 18-acre parcel next to Del Rey Elementary School. A lot subdivision will be processed to separate the multifamily and single-family phases.

The first two phases consist of 127 multifamily units on 6.5 acres of the site (density of 19.5 units per acre), with a mix of one-, two-, and three-bedroom units serving extremely low-, very low-, and low-income families. Buildings will be in the style of two- and three-story townhomes and site amenities will include a lawn and open play area and soccer field. Development of the first two phases is expected to be simultaneous, with construction starting in 2026 and finishing within two years.

The remaining 11.5 acres (including 0.5 acre of shared public access road), on the northern part of the 18-acre parcel are planned for 46 lower-income single-family units (density of four units per acre), to be developed by the Fresno County Housing Authority in conjunction with Self-Help Enterprises. Affordability for both phases will be secured by one or more funding

sources, including tax credit funds, USDA, the Joe Cerna Farmworker Housing Grant program, HOME, or PLHA.



McKinley Apartments

The County is processing a pre-application for a twostory apartment complex to be constructed on a 1.73acre site located on McKinley Avenue west of Marks Avenue in the Fresno High/Roeding Community Plan. The complex will consist of 45 two-bedroom units, which equates to a density of 26 units per acre. The site will be zoned R-3, which permits up to 29 units per acre.

The apartments are expected to rent for prices that are affordable for moderate-income families. While some

funding options are being explored to support lower-income affordability for a portion of the units, for the purposes of the Housing Element sites inventory, the County is only considering the project to be affordable at the moderate-income level. The applicant expects construction to start within the first two years of the planning period.

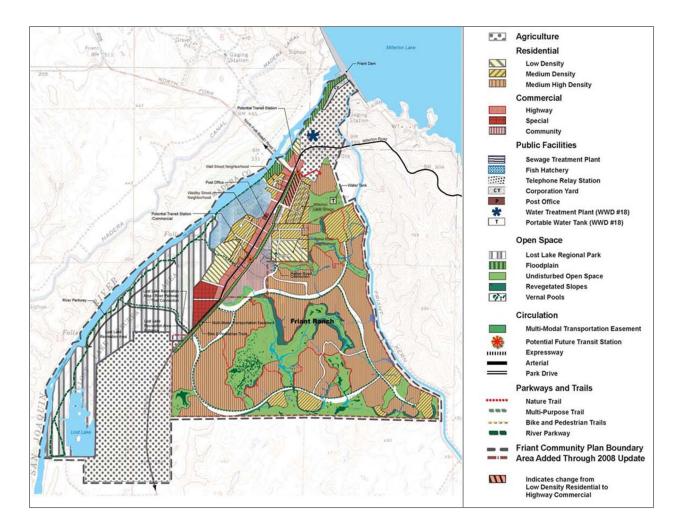
Friant Ranch Specific Plan

The Friant Ranch Specific Plan was initially approved in 2011 and envisioned a master planned community adjacent to Millerton Lake. On May 20, 2014, the Fresno County Board of Supervisors approved an application to allow the construction of a tertiary-level wastewater treatment facility to treat wastewater from the Friant Ranch Project Specific Plan Area as well as existing developments within the Community of Friant. On December 7, 2015, the Fresno County Board of Supervisors adopted the Friant Community Plan Update which increased the community plan boundary by adding the 942-acre Friant Ranch Specific Plan Area approximately five miles north of the cities of Fresno and Clovis.

Implementation of the Specific Plan was held up by litigation concerning air quality analysis in the project's environmental impact report (EIR) and the County voted to rescind its approval of the project on April 13, 2021, as required by the Court of Appeal judgement. However, on October 5, 2021, the County announced an intention to recirculate the portions of the EIR identified by the courts to need additional analysis. In 2023, the County released a Partially Revised and recirculated Draft EIR (Draft EIR) for the Friant Ranch Community Plan that contains the augmented air quality analysis. While additional time may be necessary to complete the re-entitlement of the specific plan and associated environmental clearance, the County forecasts that the project will ultimately be ready to develop during the early stages of the planning period.

The Friant Ranch Specific Plan provides for future development of up to 2,500 dwelling units in a master planned community, consisting of 346 multifamily units at a density of 12 to 20 units per acre (166 age-restricted and 180 non-age-restricted), 50 units of live-work units, and 2,104 clustered single-family units at various densities.

SECTION 1A-2: SITES INVENTORY



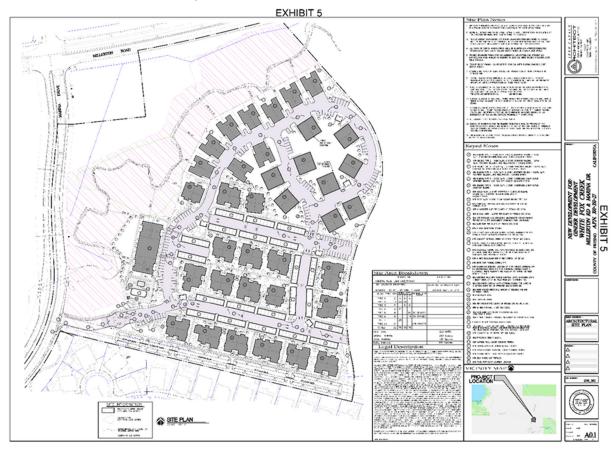
The applicant indicated (and the Draft EIR analyzed) that buildout of the entire development would occur within 10 years (per Table 3.3-5, Construction Phasing, in the Draft EIR) and that the wastewater treatment plant will be constructed.

At the time of this document's publication (late 2024), the County anticipates the project will be presented to the Planning Commission by February or March 2025 and, if recommended for approval, will proceed to the Board for consideration by May 2025. Based on this timing, the County estimates construction could begin in 2026, and the first units could be occupied in 2027. This means that the County could consider the project's first six years of development (2026-2031) to take place during the Sixth-Cycle RHNA planning period. The project's phasing plan indicates annual construction of 230 units each year through year seven, with the applicant indicating multifamily units will be constructed in the early phases while the live-work units are planned for the eighth year. Based on these figures, the County projects that approximately 1,380 units will be constructed in the Friant Ranch Specific Plan by 2031.

Based on expected densities, product types, and target occupants (senior), the multifamily units have the potential to be affordable for lower-income households, whether through smaller studio or one-bedroom

units or a portion of the senior housing units. However, to be conservative, the County is only assuming that the 346 multifamily units could be affordable to moderate-income households.

Recent single-family home prices in and around the Millerton Lake area, including the brand new master planned community of Tesoro Viejo and Cottonwood Creek at The Preserve just across the county line (within three miles), indicate that most single-family homes would be priced at \$400,000 or above. However, the Tesoro Viejo master planned community contains multiple products with pricing in the high \$300s that would even be affordable to smaller (2-person) moderate-income households. Based on this nearby pricing information, the County assumes that 103 or 10% of the single-family homes to be built in the Friant Ranch Specific Plan could be affordable to moderate-income households. The balance of 931 single-family homes is presumed to be affordable to above moderate-income households. To reflect the past delays with the project and the potential for unexpected delays to reappear, the County is assuming, for the purposes of RHNA capacity, a scenario where construction might start later than currently expected. Assuming a start date as late as 2029, the County has identified 173 of the 346 multifamily units for moderate-income households, 52 of the 103 single-family homes for moderate-income households, and 465 of the 931 single-family homes for above moderate-income households, and 465 of the 931 single-family homes for above moderate-income households, and 465 of the 931 single-family homes for above moderate-income households, and 465 of the 931 single-family homes for above moderate-income households, and 465 of the 931 single-family homes for above moderate-income households, and 465 of the 931 single-family homes for above moderate-income households, and 465 of the 931 single-family homes for above moderate-income households as pipeline units for this planning period.



White Fox Creek Multifamily Development

The County recently approved (August 6, 2024) the White Fox Creek project, a 202-unit multi-family rental development in the Millerton Specific Plan. This land was previously entitled and envisioned for a hotel and 66 housing units. This project is comprised of 22.25 gross acres (16.65 net acres after removing undevelopable creek area), approximately three miles east of the unincorporated Friant community. This development consists of a total of 202 units within 32 two-story buildings, with 70 one-bedroom units (36 age-restricted), 102 two-bedroom units, and 30 three-bedroom units.

The site is within the Millerton Specific Plan Area that is served by piped water and sewer through County Service Area No. 34 (CSA 34). The Specific Plan covers approximately 2,000 acres planned for 5,074 equivalent residential units. Millerton Lake provides domestic water through a transmission line and pumping facility and wastewater is addressed by tertiary treatment facilities. One residential neighborhood was constructed in 2016 and two additional neighborhoods are currently being completed/under construction. As new development is permitted and constructed, agreements for infrastructure connections are finalized. With roughly 10% of the total units built or under construction, the majority of residential and infrastructure capacity remains.

The project developers have not specified estimated housing costs for future residents of this project in its preliminary phase. However, according to advertised rental rates (Zumper), the current (November 2024) average rent for one- and two-bedroom apartment units in the Friant area is \$1,865 and \$1,976, respectively. This rate is roughly comparable to those of newly built (2022) multifamily in North Fresno (closest new development in Fresno County), including:

- The Lark at Copper River Apartments, with 2024 rental rates ranging from \$1,950-\$2,050 for 1bedroom units, \$2,150-\$2,250 for 2-bedroom units (\$2,750 for townhouse), and \$2,550-\$3,150 for 3-bedroom units
- 2. Woodward Park Townhouse with a 2024 rental rate of \$2,590 for a 3-bedroom unit

Using the same assumptions as in Table 2-24 of the Regional Section (Fresno County Ability to Pay), with updates to reflect 2024 income limits, the maximum monthly affordable rent for moderate income households is: \$2,110 for a two-person household, \$2,374 for a three-person household, and \$2,638 for four-person household. Based on the identified bedroom mix of the White Fox Creek project and their estimated household sizes (1-2 persons for age-restricted units, 2-3 persons for non-age-restricted units, potentially larger households for three-bedroom units), current market rents for comparable areas and properties, and affordability thresholds, all of the one- and two-bedroom units could be affordable to moderate income households. However, to be conservative, the County is assuming that roughly half of the age-restricted and non-age-restricted one-bedroom units (35) and roughly three quarters of the two-bedroom units (79), and roughly half of the three-bedroom units (15) would be affordable to above moderate income households.

Single-family Home Projects

There are a number of small or medium applications in the pipeline that consist of single-family homes (subdivisions or individual homes) likely affordable only to above moderate-income households. Examples are listed below and identified in summary on Table 1A-6 as Market Rate Single Family. Note that this is not meant to be an exhaustive list, but rather to demonstrate a pipeline of units to address a portion of the above moderate-income RHNA. These units are separate from and are not considered in the discussion of rural single-family home trends and projections.

- 3 single-family homes on the north side of SR-180 between Peach and Villa Avenue.
- 20 single-family homes north of SR-180 off of Locan Ave south of Belmont Avenue.
- 16 single-family homes at the junction of Friant Road and Willow Avenue.
- 37 single-family homes approved individually in 2023 that are still considered in the pipeline for the planning period (APNs 34814002S, 13615211, 58103004S, 58014016, 39309010, 56502001, 57101114, 15802206, 58014010, 30023009, 13518051, 1541006, 55901216, 15026007, 13637108, 57116023S, 04239014, 31404217, 31014307, 15820316, 11854062, 13091301, 50403017, 13820010,

50504075, 13845011, 44232023, 12031331, 30918050S, 30023008, 30808128S, 30036021, 13080326, 37317045, 55306025, 38503190, and 56603012S).

Accessory Dwelling Units (ADU)

While ADUs have not historically been a common development option pursued by unincorporated residents (25 permits issued in 2015 followed by annual totals between 1 and 4 through 2022), the County is actively promoting and implementing the ADU-related aspects of Program 33 (Improving Housing Options). This includes meeting with applicants and providing pre-approved ADU plans, which have led to an increase of ADU permitting activity. Of the 11 permitted in 2023, using HCD's Housing Affordability Calculator, seven were determined to be affordable to lower-income households and four were determined to be affordable to lower-income households and four were determined to be affordable to moderate-income households, as reported in the 2023 Annual Progress Report (APR). Of the 11, one was approved in March and was built later in 2023 (lower income affordability). The remaining were permitted in May (2), June (2), October (3), or December (3) of 2023, and are still considered in the pipeline. While the County is confident that its implementation of Program 33 is leading into increased ADU activity, past ADU trends are not yet sufficient to forecast additional RHNA capacity. As ADUs are permitted and constructed, the County will continue to report this activity in its APR.

Trends and Capacity of Single-Family Homes on Well and Septic

The County also evaluates development trends of single-family homes built in the unincorporated county that are not served by piped water and wastewater services. Such development has historically represented a consistent source of affordable housing due to the low cost of land and development in the unincorporated county.

Trends and Capacity of Manufactured Homes

Manufactured homes offer residents the ability to buy a single-family detached home at prices that are often 15% to 20% lower compared to site-built homes. This cost savings facilitates homeownership for lowerincome households in the unincorporated county where, compared to parcels in cities, land prices are lower and proximity to piped water and wastewater systems is not required. Table 1A-3 breaks down the total development costs of purchasing and installing a manufactured home. As shown in the table, the cost to buy land, purchase a manufactured home, pay applicable fees, and install the foundation and infrastructure systems is within the maximum affordable purchase price of low-income households, whether they are occupied by two, three, or four people.

Cost Factors	1-bed, 1-bath 560 square feet	2-bed, 1-bath 832 square feet	2-bed, 2-bath 960 square feet	
Manufactured Home Unit ¹	\$66,300	\$74,300	\$84,000	
County Planning / Building Fees	\$4,399	\$4,399	\$4,399	
Regional Transportation Mitigation Fee ²	\$1,084	\$2,118	\$2,118	

Table 1A-3: Cost Estimates to Develop Manufactured Homes

Cost Factors	1-bed, 1-bath 560 square feet	2-bed, 1-bath 832 square feet	2-bed, 2-bath 960 square feet
Indirect Source Review ³	\$1,100	\$1,100	\$1,100
Wildland Urban Interface CalFire Fee ⁴	\$2,000	\$2,000	\$2,000
School Fees ⁵	\$2,682	\$3,985	\$4,598
Unit Transportation / Delivery	\$5,000	\$10,000	\$15,000
Well and Septic System Installation ⁶	\$40,000	\$40,000	\$45,000
Electricity Connection / Extension	\$6,500	\$5,000	\$5,000
Propane Tank & Installation (Underground) ⁷	\$2,000	\$2,500	\$4,000
Air Conditioning & Installation ⁸	\$750	\$1,500	\$10,000
Landscaping	\$5,000	\$5,000	\$5,000
Foundation Construction / Installation	\$13,000	\$20,000	\$20,000
TOTAL DEVELOPMENT COST 9			•
Vacant land 2-5 acres, cost up to \$29,000	\$178,933	\$194,486	\$224,799
Vacant land 2-5 acres, cost up to \$49,000	\$198,933	\$214,486	\$244,799
Vacant land 2-5 acres, cost up to \$60,000	\$209,933	\$225,486	\$255,799
Max Affordable Price for a Low Income Household ¹⁰	\$232,153 (2-person)	\$261,260 (3-person)	\$290,134 (4-person)

Table 1A-3: Cost Estimates to Develop Manufactured Homes

Notes:

- 1. Based on prices for manufactured homes (Clayton West) sold in Fresno County, as advertised in March 2023.
- 2. Charged by the Fresno County Transportation Authority.
- 3. Charged by the San Joaquin Valley Unified Air District.
- 4. Only required for properties within the (WUI) wildland urban interface (generally the Sierra (North and South) and Coalinga Regional Plan Areas). The majority of the county is not within a WUI area and is not within a fire hazard severity zone (state or local responsibility areas) as determined by CalFire.
- 5. Assumes the maximum authorized of \$4.79 per square foot. This is the fee charged by Fresno Unified and Clovis Unified, although some charge less and some (Sierra Unified) do not collect any developer fees.
- 6. Reflects need for drilling down as deep as 300 feet and two-acre minimum parcel size for an onsite wastewater treatment system (OWTS or septic).
- 7. Tank size and household assumptions: 500 lb/2 pph, 750 lb/3 pph, and 1,000 lb/4 pph.
- 8. Room air conditioners were assumed for each bedroom in the 560- and 832-square foot homes (installed in the wall or window). A central air conditioning unit was assumed for the 960-square foot home.
- Based on sales price for 19 unimproved parcels that are between two and five acres, have access to well water, are suitable for onsite septic systems, and are available for purchase in unincorporated county (Gravesboro, Sanger, Squaw Valley, Tollhouse), as advertised on Zillow in March 2023. Total sales prices ranged from \$12,500 to \$70,000, with \$29,000 representing lower quartile, \$49,000 representing average, and \$60,000 representing upper quartile.
- 10. Based on HCD Income Limits, 2022.

In 2023, the median total origination charge for a primary mortgage for a manufactured home in Fresno County was \$5,762 according to the Consumer Finance Projection Bureau. The median interest rate during this time period was 7.1%, with a mode of 7.8% and a maximum interest rate of 11%. The most commonly originated loan product was a loan of 30 years, though some loans were as short as 20 years. The median loan amount for originated loans was \$175,000, with a maximum loan amount of \$325,000. The median

property value for which a loan was originated was \$245,000, which indicates that manufactured homes were available for purchase within an affordable price range. All of the observed manufactured units purchased in 2023, in Fresno County, are the principal residence of the buyer. This suggests that financing costs and the overall prices for most manufactured homes are in an affordable price range and serves as an indicator of a pattern that more affordable land parcels have been available.

The County anticipates the continued construction of an incremental number of manufactured homes, consistent with construction trends (occupancy permit issued) from the past years of 2018 to 2022 (based on annual progress reports). Table 1A-4 presents the estimated projection of new units to be permitted or constructed during the planning period (excluding any housing already in the pipeline). However, this estimate may be conservative. In 2023, permits were pulled for 20 manufactured homes and, based on the sales price of these units, all 20 were determined to be affordable to low-income households. The County's forecast on affordability is more conservative based on some cost increases compared to the previous housing cycle; e.g., well installation due to deeper drilling requirements. While low land costs in some areas may enable very low-income households to afford an appropriately sized manufactured home, the majority of manufactured homes are presumed to be affordable to low-income households in this planning cycle.

		2018 to 2023		Projections 2024-2031	
Affordability (per APR)	Construction	Percentage Distribution	6-year average	Percentage Assumption	Projected Production
Very Low Income	26	52%		5%	3
Low Income	23	46%	8.5	85%	58
Moderate Income	1	2%	8.5	10%	7
TOTAL	50	100%		100%	68
2023 APR Listings of Permits	s Issued and Affo	ordability by Inc	come Category		
APN	APR Year	Very Low	Low	Mod	Above Mod
37310012 (built 4/13/23)	2023	-	1	-	-
18532033S (built 5/22/23)	2023	-	1	-	-
03508029 (built 6/7/23)	2023	-	1	-	-
32717121S (built 10/26/23)	2023	-	1	-	-
12871035 (built 11/3/23)	2023	-	1	-	-
04306076 (built 11/16/23)	2023	-	1	-	-
16042010S (built 11/27/23)	2023	-	1	-	-
32712067 (built 12/20/23)	2023	-	1	-	-
31024022	2023	-	1	-	-
11854061	2023	-	1	-	-
04128051	2023	-	1	-	-
14022060	2023	-	1	-	-
46311010	2023	-	1	-	-

Table 1A-4: Manufactured Home Trends and Projections

Affordability (per APR)	2018 to 2023			Projections 2024-2031	
	Construction	Percentage Distribution	6-year average	Percentage Assumption	Projected Production
18538070	2023	-	1	-	-
11855051	2023	-	1	-	-
18541025	2023	-	1	-	-
025160198	2023	-	1	-	-
053351018	2023	-	1	-	-
37334016	2023	-	1	-	-
33420138	2023	-	1	-	-

Table 1A-4: Manufactured Home Trends and Projections

Note: Figures subject to rounding: average to nearest 0.5 and projections to whole numbers. Affordability of APR listings determined by HCD Housing Affordability Calculator.

Trends and Capacity of Rural Single-Family Homes

The County anticipates the continued construction of detached single-family units in rural areas during the planning period. Pending rural single-family housing (housing built away from urbanized areas serviced by onsite water wells and septic systems), is distributed throughout the unincorporated county. Parcels that are large enough to accommodate onsite septic systems (two acres or larger) are still plentiful in and around various unincorporated communities. Based on the past five years of construction activity, a little more than half (57%) of rural single-family homes were affordable to above moderate-income households and the balance (43%) were affordable to moderate-income households.

Affordability assumptions were calculated using assessed improvement value (which includes construction costs) plus land value plus roughly \$80,000 in fees and other site improvement costs (same site improvement costs as for manufactured homes, less unit transportation costs). Rural single-family homes are built one-at-a-time by individual households, typically employing a general contractor to transport raw or roughly finished materials to the site for onsite construction.

The County anticipates continued construction of rural single-family homes, consistent with trends (built and occupied) from 2018 to 2022 (based on annual progress reports). Table 1A-5 presents the estimated projection of new units to be permitted or constructed during the planning period (excluding housing in the pipeline). The County's forecast on affordability is slightly more conservative based on assumed cost increases compared to the previous housing cycle; e.g., well installation due to deeper drilling requirements.

Affordability (per APR)	2018 to 2022			Projections 2023-2031	
	Construction	Percentage Distribution	5-year average	Percentage Assumption	Projected Production
Moderate Income	126	43%	25	40%	189
Above Moderate Income	170	57%	34	60%	284
TOTAL	296	100%	59	100%	473

Table 1A-5: Rural Single-Family Home Trend Projections

Note: Figures subject to rounding.

The figures in Table 1A-5 are conservative projections and there are at least a thousand additional vacant parcels that are currently zoned for residential development at densities of one unit per two acres across the Valley and Foothill parts of the county. These parcels could support the installation of rural single-family homes that could be served by well and septic systems and are free of any environmental, infrastructure, or other constraints. In 2023, roughly half of single-family homes in unincorporated county areas for which building permits were pulled (46 of 89) were determined to be affordable to moderate or lower-income households. The majority of single-family detached homes at this affordability level were located in the Valley and Foothill areas, with a minority of single-family homes at this affordability level located in the unincorporated areas around Fresno, Clovis, Fowler, and Sanger as well as in the communities of Del Rey and Easton. These sites could provide additional capacity for the County's above moderate-income RHNA, should it be necessary. Per California Government Code Section 65583.2(b)(6), because these sites only address the above moderate-income RHNA and are not dependent upon connected/piped water and wastewater systems, such sites are not required to be identified in the Housing Element by parcel.

At the time of this Housing Element's production, the Friant Ranch Specific Plan has capacity to cover the majority of the County's above moderate RHNA figure, and no tabulation of additional capacity is necessary. However, should the Friant Ranch Specific Plan not be re-entitled early enough in the planning period to provide capacity for the County's remaining above moderate-income RHNA, the County will consider its above moderate-income RHNA capacity to be accommodated by a portion of the aforementioned additional thousand-plus vacant parcels that are already zoned and suitable for development.

RHNA Balance Prior to Vacant Land Capacity

The County expects to satisfy all of its above moderate and moderate RHNA, as well as a portion of its lower-income RHNA, through: affordable and market rate developments, the Friant Ranch Specific Plan currently under review, and projections of ongoing construction of rural single-family homes and manufactured homes on lots served by wells and onsite septic systems. After considering planned and projected units, the County has a remaining RHNA of 763 lower-income units to address through vacant and developable land.

	Very Low	Low	Moderate	Above Mod	Total
RHNA 2023-2031	706	391	370	883	2,350
Planned or Entitled Units				·	
Willow Heights Apartments Phase 1	-	62	-	-	62
Willow Heights Apartments Phase 2	-	32	-	-	32
Del Rey Phase 1 – Multifamily	52	15	-	-	67
Del Rey Phase 2 – Multifamily	45	15	-	-	60
Del Rey Phase 3 – Single Family	-	46	-	-	46
McKinley Apartments	-	-	45	-	45
Friant Ranch Specific Plan	-	-	225	465	690
White Fox Creek Multifamily	-	-	129	73	202
Market Rate Single Family (2023/24)	-	-	-	76	76
Accessory Dwelling Units (2023)	-	6	4	-	10
Projections				·	
Manufactured Homes	3	58	7	-	68
Rural Single-Family Homes	-	-	189	284	473
SUBTOTAL	100	234	599	896	1,829
Remaining RHNA 2023-2031	606	157	-	-	763

Table 1A-6: Pipeline Development and Trend Projections

Source: County of Fresno, 2024.

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 County'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.

Development Criteria

Although the County contains a vast amount of vacant land, specific criteria were applied to select only sites with the best chance of developing during the planning period, while maintaining consistency with the policies elsewhere in the General Plan and approaches to affirmatively furthering fair housing.

Vacancy Status

Any site included must be vacant, generally defined as undeveloped land but more precisely defined as land that is not already slated for future development and lacks any building improvements, unless they are clearly abandoned or so dilapidated as to be non-functional. Additionally, consistent with changes in state law, land used for agricultural purposes is no longer considered functionally vacant even with an absence of building improvements.

Environmental Hazards or Restrictions

Any site included must be free from environmental hazards and restrictions that could make future housing development unsafe or increase development costs substantially. The intent is to identify housing opportunities that accommodate the RHNA allocation without increasing the number of future residents exposed to potential harm caused by environmental hazards and without increasing the potential strain on emergency services during a disaster or periodic times of extreme weather. Vacant sites were excluded if they contained or were exposed to hazards related to earthquakes, 100-year flooding, dam/basin inundation, very high fire hazard severity zones, wind erosion, and airport safety zones. Vacant sites were also excluded if they were subject to conservation easements or Williamson Act contracts. Unless a site met additional criteria that indicated the site was functionally an infill site, vacant sites were excluded if they were designated as farmland that is prime, of statewide importance, or unique. The additional criteria for such a site to be considered an infill site and eligible for consideration are: no evidence of farming in the past 10 years, no Williamson Act contracts or other restrictions/limitations/easements, and surrounded on at least two sides by residential development served by piped water and sewer.

Only one site (APN 055-161-21S) is included in the inventory that meets these criteria (as an infill site) and is currently identified as prime farmland. No evidence of any agricultural activity (or any development activity) was found on this parcel dating back at least 30 years (based on aerial records). Additionally, the County is in the process of implementing its recently adopted (2024) General Plan, including encouraging the State of California to update its Important Farmland Map, which may include the reclassification of this parcel.

Established Community Areas

Any site included must be within an existing community planning area or unincorporated sphere of influence (SOI). Although development does occur outside of such areas, the amount of development is relatively small, and the County does not seek to encourage substantial growth outside of such areas.

Resource Areas

The County applied the lens of AFFH when considering vacant sites using the state's assessment of access to economic, educational, and environmental resources: the California Tax Credit Allocation Committee's (TCAC) Opportunity Maps. The County focused on identifying vacant sites for lower-income housing in high or highest resource areas that offered suitable zoning and proximity to urban services and amenities. The high and highest resource areas score the best in terms of access to educational and economic resources and the least amount of exposure to harmful pollution. The County reviewed both 2021 and 2023 TCAC opportunity area analyses. Many of the sites selected are in high or highest resource areas according to the 2023 analysis. Some areas in the western portion of the Fresno SOI that were in moderate resource areas in the 2021 analysis are considered to be in high resource areas as of the 2023 analysis, indicating improvement in local conditions. However, there are a small number of sites that are in moderate or lowerresource areas, including in the West Fresno SOI (low resource) and in the Caruthers area (moderate resource). These areas were deemed to be suitable for inclusion in the vacant sites inventory due to their stable or improving conditions and close proximity to higher-scoring census tracts and block groups. In the case of the West Fresno SOI, where two sites are in a low-resource census tract, the parcels are adjacent to each other and have the same property owner, who expressed an interest in having the properties rezoned. Both of these factors increases the likeliness of the site being developed during the planning period. Additionally, though the TCAC resource designation is low, this is partly due to education domain scores in the area. As part of Program 30, the County will work collaboratively with the Central Unified School District to identify housing-related impediments to student achievement and strategies to address these factors.

It should be noted that most of the land within the eastern part of the county is designated as high or highest resource areas but are relatively undevelopable for higher density housing. Much of the land in the Sierra Nevada region of the county is subject to excessive slope, in a National Forest, reserved exclusively for open space or habitat preservation, and/or is outside of or far from community planning areas and city SOIs.

Disadvantaged Communities

As summarized in the County's Environmental Justice Element, the vast majority of Fresno County's cities, communities (see Table EJ-1), and developable land are identified as disadvantaged communities (based on CalEnviroScreen (CES) version 3.0 or 4.0). CES is the State's data tool that identifies the relative health risk of people living in each census tract across California based on a variety of population and pollution criteria. The results are ranked, with census tracts that have the least health risk (compared to others in the state) being ranked in the 1st percentile (meaning 99% of census tracts have a greater health risk) and census

tracts that have the greatest health risk being ranked in the 100th percentile (meaning 99% of census tracts have a better health risk). Those census tracts ranked in the 75th to 100th percentiles (also referred to as the upper quartile) are considered a disadvantaged community. The County prioritized the selection of sites that were in census tracts that fell below the upper quartile based on the latest available data (CES 4.0). However, because of the agricultural nature of many parts of the unincorporated county (in small community areas and outside of city boundaries), the CES pollution factors and rankings tend to be higher (consistent with agricultural areas), and so sites were not eliminated if they fell within a census tract with a CES score in the upper quartile.

Parcel Characteristics

Only sites between one-half acre and 10 acres were considered suitable for lower-income housing. Additionally, parcels were excluded if they presented any constraints based on shape, access, easements, zoning overlays, or other property conditions that would unduly hinder future residential development. Any such characteristics that were present (e.g., utility easement) were factored into the site capacity calculations to ensure a conservative estimate of future development.

Sites 7, 8, and 9 are under common ownership but also contain a 70-foot wide utility easement that runs along the easter edge of the 300-foot wide properties, which reduces capacity on the parcels by roughly 23%. While future residential development could use a portion of the utility easement for parking and open space areas, to be conservative, the County has calculated the estimated realistic capacity on these sites using the minimum density along with an additional 50% reduction to account for potential site design complexities and inefficiencies.

Ownership

Sites were only included if they were owned by private individuals or entities. No sites were included if they were owned by exempt entities (e.g., federal government, tribal entities, state surplus sites, school districts, railroads, and special districts).

Infrastructure

Sites were only included if they either had known groundwater resources (for onsite wells), could support onsite septic systems (with adequate space for leech fields), or could be served by piped water and wastewater systems either now or early in the planning period. The County also only included vacant sites that were served by existing paved roadways, electricity, and telecommunications systems. Input provided by the Biola and Caruthers Community Service Districts (CSDs) indicate that ample water and wastewater connections are available in these areas.

In the Biola CSD, there are 654 water and 309 wastewater connections available, which is more than sufficient to serve the number of units identified to meet the RHNA in this area. In the Caruthers CSD area, there are currently approximately 31 water and 141 wastewater connections available, but a new well is being installed that will greatly expand water connections, ensuring ample capacity for water and

wastewater beyond the number of units identified to meet the RHNA in this area. In the Del Rey CSD service area, there are an estimated 215 water connections and 263 sewer connections available, which is more than sufficient to serve the pipeline project capacity identified to meet the RHNA.

Though water and sewer capacity is currently limited in Riverdale, the County recently provided millions in funding to supplement additional state funding to expand water capacity (by 400 to 600 connections) and wastewater (by 360 to 400 connections) capacity in the next few years, ensuring well beyond the capacity needed to serve the number of units identified to meet the RHNA in this area. Projects in the vicinity of Clovis and the City of Fresno will be served by existing water and sewer service in those areas which is sufficient to serve the units identified to meet the RHNA. Both jurisdictions latest available (2020) Urban Water Management Plans projected a large surplus of water supply in 2030, even after including forecasted growth: 16,113 acre feet in Clovis and 128,384 acre feet in Fresno (one acre foot equals approximately 326,000 gallons or about enough to serve two family households). The City of Clovis General Plan Environmental Impact Report (EIR) indicated an existing surplus capacity of over 17,000 acre feet. The Fresno-Clovis Regional Wastewater Reclamation Facility (which serves the areas in the County's sites inventory for the Fresno SOI) has a surplus (as reported in the 2022 EIR) of upwards 16 million gallons per day (MGD), with upgrades anticipated to increase capacity further by 15 MGD. Though sites 14 and 15 are considered close enough to existing sewer to facilitate future development in the planning period, the County has reduced the assumed development capacity by 50% to account for the parcel's distance from existing sewer (one-half mile), accounting for additional costs to obtain easements or run sewer extension within the public right of way.

Transit

Proximity to existing transit service was considered a desirable, though not required component of candidate sites. Proximity was defined as follows:

- **Ideal**: bus stop within a short walking distance (quarter mile)
- **Preferred:** bus stop within a medium walking distance (half mile)
- Acceptable: bus stop within a short biking distance (one mile)
- **Future Proximity:** bus stop adjacent to or within an area slated for more intense development that is of sufficient scale to likely warrant and support an extension of existing transit service that is within at least one mile of a candidate site during the planning period
- Other: either served by an on-demand service operated by Fresno County Rural Transit or within a community that lacks sufficient population to support an extension of existing or creation of new transit service.

Because the County must balance numerous factors when considering suitable candidate sites, a lack of proximity to transit did not disqualify a candidate site from consideration.

Residential Zoning, Density, and Affordability

The County considered vacant land with R-2, R-2A, R-3, or R-3A zoning, all of which allow residential development at a density of 20 or 29 units per acre to have the capacity to accommodate housing affordable to lower-income households. This conclusion was based both on state law, which deems zoning that allows at least 20 units per acre can be presumed to accommodate lower-income housing for the purposes of determining RHNA capacity (20 units per acre is the default density for the County given that it is within a Metropolitan Statistical Area with a population of less than 2 million).

Development Community Input

Several affordable housing developers were contacted to provide input on their experience in Fresno County on higher density affordable housing. Both Self-Help Housing and Willow Partners build affordable multifamily and senior housing throughout the Central Vally. The Fresno County Housing Authority, which funds and develops affordable housing throughout the County, was also contacted. All three entities agreed that the typical parcel sizes suitable for affordable housing generally fall between one-half acre and 10 acres, with some preferring parcels between two and five acres in size while others have experience working with parcels smaller than one-half acre or larger than 10 acres. While the lower land costs in the unincorporated county can facilitate greater affordability at lower densities, these entities agreed that unincorporated areas are often far from infrastructure and services needed to not only develop the site but to compete for various types of gap financing. The development entities also agreed that zoning and identifying sites in census tracts designated by TCAC as high or highest resource areas would help the competitiveness of funding applications. The typical project size for affordable developments falls between 60 and 80 units in project size, though it is not uncommon for some affordable projects to be much smaller (closer to 20 units) or larger (over 100 units), and the Fresno County Housing Authority maintains a scattered sites program with one or two units per parcel across a wide area.

Additional public input received during the 30-day review period of the initial draft Housing Element requested that the County focus on parcels larger than two acres and in more affluent areas on the eastern side of Fresno and to the northeast of Fresno and Clovis. The County revised its initial draft sites inventory to better align with desirable development parameters and community input.

Realistic Development Potential

Sites to be Rezoned

For any sites that are to be rezoned as stated in Program 14, the County calculated realistic development potential based on the minimum density of 20 units per acre. In two areas (explained below), the County applied some additional reduction factors that account for utility easements and cost associated with extending sewer infrastructure.

Sites 7, 8, and 9 are under common ownership but also contain a 70-foot wide utility easement that runs along the easter edge of the 300-foot wide properties. This easement reduces capacity on the parcels by

roughly 23%. While future residential development could use a portion of the utility easement for parking and open space areas, the County is calculating capacity using the minimum density along with an additional 50% reduction to account for potential site design complexities and inefficiencies.

On sites 14 and 15, the County is calculating capacity using the minimum density along with an additional 50% reduction to account for the parcel's distance from existing sewer (one-half mile), accounting for additional costs to obtain easements or run sewer extension within the public right of way. However, it is worth noting that the sites are still considered close enough to existing sewer to facilitate future development in the planning period.

Sites with Current Higher-Density Zoning

For sites that are currently zoned with appropriate zoning for lower-income housing, the County started with the maximum density that would be permitted by right for a lower-income housing development and applied downward adjustments to account for factors that may reduce a site's capacity below the maximum level allowed. To be conservative and follow guidance from HCD, the County did not add any increase in density due to the application of state density bonus provisions.

Additionally, the County evaluated and applied additional factors and researched relevant project examples, consistent with the methodology recommended by HCD, to arrive at more realistic capacity projections. Based on the factors cited below, the County applied a cumulative adjustment factor of 62.6%.

- Land use controls factor: No adjustment. The County evaluated the cumulative impact of its development standards (e.g., setbacks, building height, parking; see the Constraints analysis in the next section), and determined that no downward adjustment factor is necessary.
- Site improvements factor: 80%. The County considered land use controls and site improvements and assumed an 80% adjustment to the maximum number of units on the site to reflect developable acreage due to on-site improvements, including: sidewalks, utility easements, and infrastructure improvements (e.g., roadway access, water, wastewater, and stormwater).
- Infrastructure availability factor: 90%. All sites are served by or are adjacent to parcels that are currently served by infrastructure. A slight reduction factor has been applied to account for the added cost of extending services.
- Environmental constraints factor: No adjustment. All sites are unconstrained by natural hazards or resources that would reduce capacity. All sites are outside of areas designated for 100-year flood, fire hazard severity, Alquist-Priolo fault, or other hazards, as well as areas designated as farmland that is prime, of statewide importance, or unique.
- **Realistic capacity based on trends and incentives: 87%.** The County evaluated past development trends of lower-income housing on sites either in unincorporated communities or in cities with zoning that allowed development intensities comparable to that allowed by the County. Table 1A-7 provides

more detailed information on these project examples. The average percentage of maximum density sought by affordable housing developments is 87%.

Project Name & City/Community	Income Category	Acres	Project Status	GP & Zone	Total Project Units	Max. Allowable Units	Realistic Capacity
Family Housing Ph 1 Del Rey (unincorp)	Lower	6.5	In process	MHDR R-3	127 19.5 du/ac	189 29 du/ac	67%
Family Housing Ph 2 Del Rey (unincorp)	Lower	11.5	In process	MHDR R-1	46 4 du/ac	83 7.2 du/ac	55%
McKinley Apartments Fresno (unincorp)	Moderate	1.73	In process	HDR R-3	45 26 du/ac	50 29 du/ac	90%
Gateway Villas Kerman	Lower	4.43	Built 2016	HDR R3	61 14 du/ac	89 20 du/ac	69%
Hacienda Heights Kerman	Lower	5.37	Built 2010	HDR SD-R-2.5	69 13 du/ac	107 20 du/ac	64%
Marion Villas Kingsburg	Lower	1.38	Built 2015	CC CC	48 35 du/ac	34 25 du/ac	139%
Kashian (mixed-use) Reedley	Extremely Low	2.11	Approved 2022	CC CC	70 33 du/ac	61 29 du/ac	115%
Reedley I (mixed-use) Reedley	Lower	4.25	Approved 2022	LI ML	80 19 du/ac	63 15 du/ac	127%
Willow Heights Riverdale (unincorp)	Lower	7.4	In process	MHDR R-2	94 13 du/ac	148 20 du/ac	63%
Blossom Trail Sanger	Lower	4.3	Built 2017	MDR RM-2.5	55 13 du/ac	75 17 du/ac	74%
Crossing 1 & 2 Sanger	Lower	4.96	Built 2021	MDR RM-2.5	81 16 du/ac	86 17 du/ac	94%
						Average	87%

Table 1A-7: Realistic Capacity Project Examples

Source: County of Fresno and the cities of Kerman, Kingsburg, Reedley, and Sanger, 2023.

Land Inventory

As shown in Table 1A-8, the County's vacant sites inventory has an estimated maximum capacity of 1,711 units and a realistic capacity of 1,001 total units. Based on default density standards and the minimum densities being applied to rezoned parcels, the vacant sites provide capacity for 1,001 lower income units, which is enough to accommodate the County's remaining lower-income RHNA of 763 units, plus a substantial amount of surplus capacity (at least 20%).

Table 1A-8: Capacity	y on Vacant Sites
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S:4		Owner	Acres	Cur	rent	Future ¹		Density		Capacity for Remaining Lower-Income RHNA ^{2,3}		
Site	APN			GP	Zone	GP	Zone	Min ⁴	Max	Max	Adjustment ⁴	Realistic
Biola												
11,5	016-480-30	А	0.98	OC	R-P	MHDR	R-3	20	29	29	min density	20
Carut	hers											
2	043-201-27	В	3.50	MHDR	R-2	MHDR	R-2	5.8	20	70	62.60%	44
31	043-060-75	В	8.26	MDR	R-1	MHDR	R-3	20	29	240	min density	166
Clovis	SOI											
4	495-061-25	С	3.20	MHDR	R-3	MHDR	R-3	5.8	29	93	62.60%	58
Fresno	o SOI (West)											
5 ¹	511-021-13	D	2.03	RR	RR NB ⁸ NB ⁷	MHDR	R-3	20	29	59	min density	41
61	312-092-41	Е	2.27	RR	RR	MHDR	R-3	20	29	66	min density	46
71	511-021-02	F	2.22	RR	RR	MHDR	R-3	20	29	64	see note 6	23
81	511-021-03	F	2.22	RR	RR	MHDR	R-3	20	29	64	see note 6	23
9 ¹	511-021-04	F	2.22	RR	RR	MHDR	R-3	20	29	64	see note 6	23
10 ¹	511-022-07	Н	2.37	RR	RR NB ⁸ NB ⁷	MHDR	R-3	20	29	69	min density	48
111	511-031-478	Ι	2.3	MDR- ₽ ⁹ <u>R</u> ⁸	AL-20	MHDR	R-3	20	29	67	min density	46
12 ¹	511-031-488	Ι	2.3	MDR- ^{¶9} <u>R</u> ⁸	AL-20	MHDR	R-3	20	29	67	min density	46
13 ¹	511-031-498	Ι	4.15	MDR- R ⁹ <u>R</u> ⁸	AL-20	MHDR	R-3	20	29	120	min density	83
14 ¹	512-141-36	Ŧ	7.34	RR	RR	MHDR	R3	20	29	213	see note 7	74
15 ¹	512-141-38	ł	3.33	RR	RR	MHDR	R3	20	29	97	see note 7	3 4
1 <u>4</u> 6 ¹	449-040-05	K	3.26	RR	RR NB ⁸ NB ⁷	MHDR	R-3	20	29	95	min density	65
1 <u>5</u> 7 ¹	449-040-55	K	3.11	RR	RR NB ⁸ NB ⁷	MHDR	R-3	20	29	90	min density	62
Fresne) SOI (Southea	st)										

C' 4.	Site APN C	0	Acres	Current		Future ¹		Density		Capacity for Remaining Lower-Income RHNA ^{2,3}		
Site		Owner		GP	Zone	GP	Zone	Min ⁴	Max	Max	Adjustment ⁴	Realistic
$\frac{18^{1}}{18}$	316-130-10	Đ	1.39	LDR	R1B NB ⁸	MHDR	R3	20	29	41	min density	28
River	Riverdale											
1 <u>6</u> 91	055-161-21S	L	3.55	MDR	R1/2/2A	MHDR	R-3	20	29	103	min density	71
		Totals	60.00							1, <mark>711<u>360</u></mark>		1,001<u>865</u>

Notes:

 Consistent with Program 14, a number of sites will be rezoned to accommodate the County's lower income RHNA. the County adopted Ordinance No. R-505-3871 and Resolution No. 24-410 on December 17, 2024 to change the zoning and general plan consistent with the "Future" designations shown in this table. The sites that were rezoned in December 2024 will continue to be referenced and tracked as sites to be rezoned elsewhere in the Housing Element as they were rezoned after the start of the planning period and are therefore subject to certain requirements (minimum densities and by-right development for certain projects).

- 3. After considering planned and projected units, the County has a remaining RHNA of 763 lower-income units to address through vacant land. Accordingly, this table only evaluates the sites' capacity to address the remaining lower-income RHNA.
- 4. Sites to be rezoned consistent with Program 14 will require a minimum density of 20 units per acre (rezoned sites will permit residential by right). Sites with current zoning apply an adjustment factor of 62.6% as explained in the discussion on Realistic Development Potential.
- 5. Site identified in prior two Housing Element cycles.
- 6. These parcels are under common ownership but also contain a 70-foot wide utility easement that runs along the easter edge of the 300-foot wide properties, which reduces capacity on the parcels by roughly 23%. While future residential development could use a portion of the utility easement for parking and open space areas, to be conservative, the County is calculating capacity using the minimum density along with an additional 50% reduction to account for potential site design complexities and inefficiencies.
- 7. While the site is still considered close enough to existing sewer to facilitate future development in the planning period, the County is calculating capacity using the minimum density along with an additional 50% reduction to account for the parcel's distance from existing sewer (one-half mile), accounting for additional costs to obtain easements or run sewer extension within the public right of way.
- 87. RR NB = Rural Residential Neighborhood Beautification; with NB as an overlay district that limits certain activities such as leaving boats, abandoned vehicles, residual from demolitions or fires, etc.
- 98. MDR-R = Medium Density Residential Reserve: a land use category used to identify future areas of urban development but still defer to current zoning until future development is proposed.

^{2.} Figures subject to rounding.

Electronic Sites Inventory

State law requires jurisdictions to submit an electronic copy of their inventory using a Microsoft Excel-based form provided by HCD. Pursuant to California Government Code Section 65585(g), an electronic copy of the County's sites inventory must be submitted with the adopted Housing Element. A PDF copy of this electronic form is incorporated by reference into the Housing Element and provided under separate cover. A PDF copy of this electronic form was also submitted to HCD with the Draft Element (concurrently published online).

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% units affordable to lower-income households.

One vacant parcel identified in the prior two Housing Elements is again considered in this Element. The site with APN 016-480-30 (in Biola) was previously zoned R-2 when included in the previous Housing Element but was rezoned to R-P in 2019 as part of an application to pursue a medical clinic. There has been no activity since 2019 and the site is considered to be available and suitable for lower multifamily housing. To ensure that the site will be available for housing, the County is rezoning the site to R-3, with a minimum density of 20 units per acre in accordance with Program 14. The County considers this to be a substantial change that will increase the likelihood of development on the site during this planning period.

Additionally, the site's density range (minimum of 20 and maximum of 29 units per acre), is equal to or above the default density threshold identified in state law as presumed to facilitate affordable housing. Any multi-family development processed under the zone associated with this parcel is already permitted by right and so the County is already in compliance with Government Code Section 65583.2(i) as enacted through Assembly Bill 1397, which requires by-right (without discretionary review) approval for housing developments in which at least 20% of the units are affordable to lower-income households.

Summary of Capacity

Table 1A-9 summarizes the County's capacity for residential development in Fresno County. The locations of these sites are shown in Figures 1A-1 through 1A-6. The capacity for over 3,200 units is spread across affordable and market rate development plans that are already in progress, projected manufactured and rural single-family homes (based on the past five years of production), and capacity on vacant parcels that are suitable for higher density housing. Overall, the County has more than adequate capacity to accommodate its remaining RHNA of 763 lower-income units for the Sixth-Cycle planning period.

	Very Low	Low	Moderate	Above Mod	Total
Planned or Entitled Units	97	176	403	612	1,288
Projected Manufactured Homes	3	58	7	-	68
Projected Rural Single-Family Homes	-	-	189	284	473
Currently Zoned Capacity on Vacant Land ¹	10)2	-	-	102
Rezoned Capacity on Vacant Land¹	89	99	-	-	899
SUBTOTAL	1,3	35	599	896	2,830
RHNA 2023-2031	1,0	97	370	883	2,350
Surplus Capacity	23	38	229	13	480

Table 1A-9: Summary of Capacity to Accommodate the RHNA

Note:

1. As permitted by HCD, capacity can be merged to address the combined very low- and low-income RHNA.

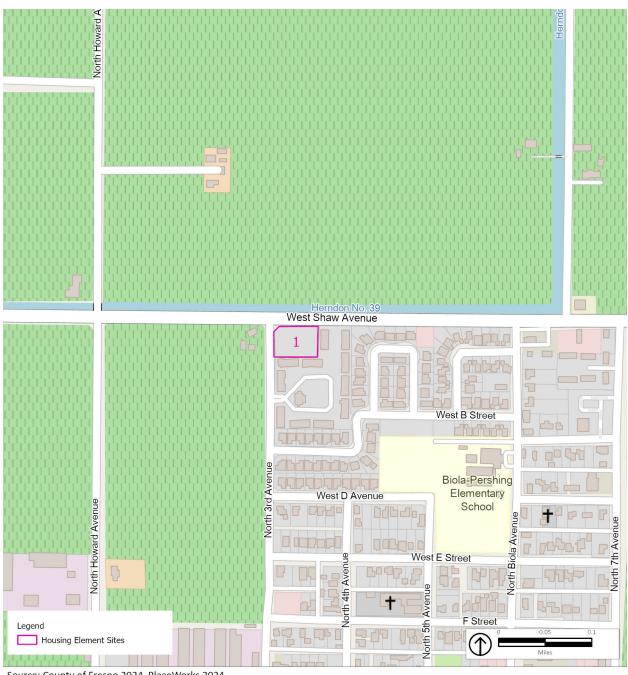


Figure 1A-1: Biola Sites Inventory Map

Source: County of Fresno 2024, PlaceWorks 2024

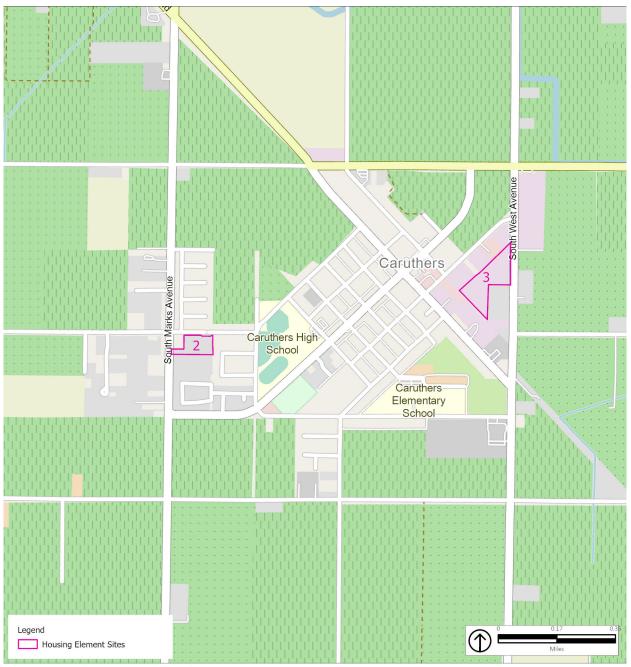


Figure 1A-2: Caruthers Sites Inventory Map

Source: County of Fresno 2024, PlaceWorks 2024

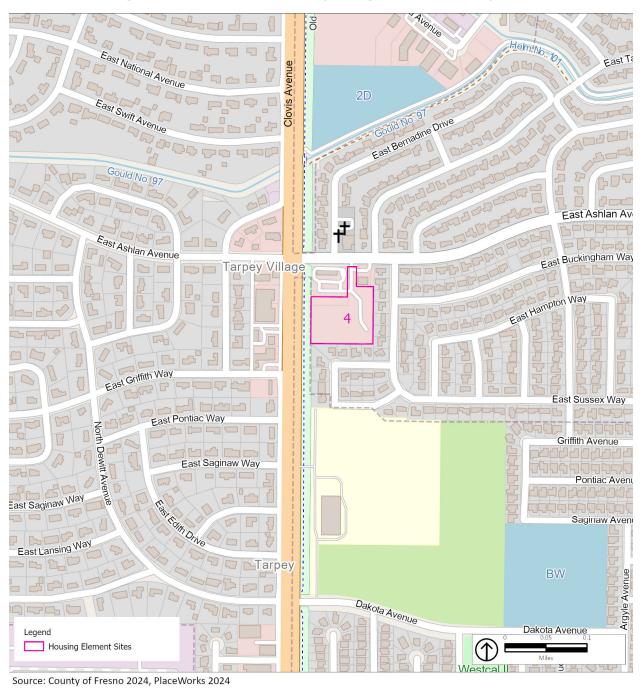


Figure 1A-3: Clovis SOI (Tarpey Village) Sites Inventory Map

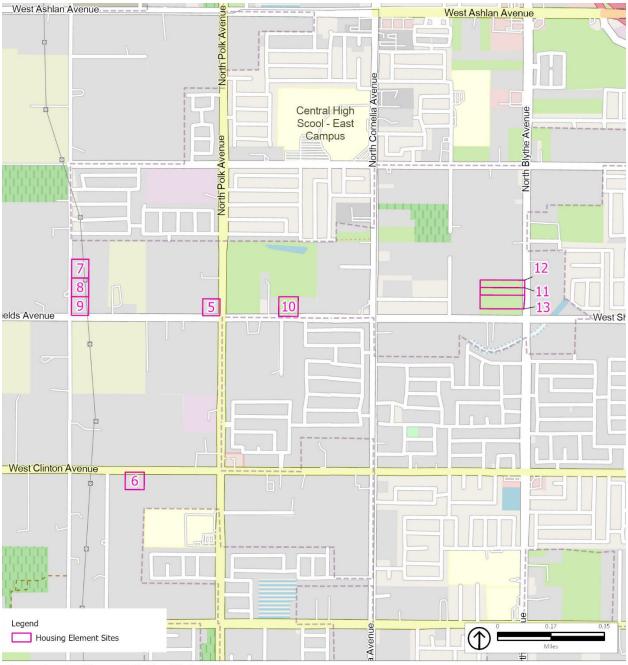


Figure 1A-4: Fresno SOI (West) Sites Inventory Map

Source: County of Fresno 2024, PlaceWorks 2024

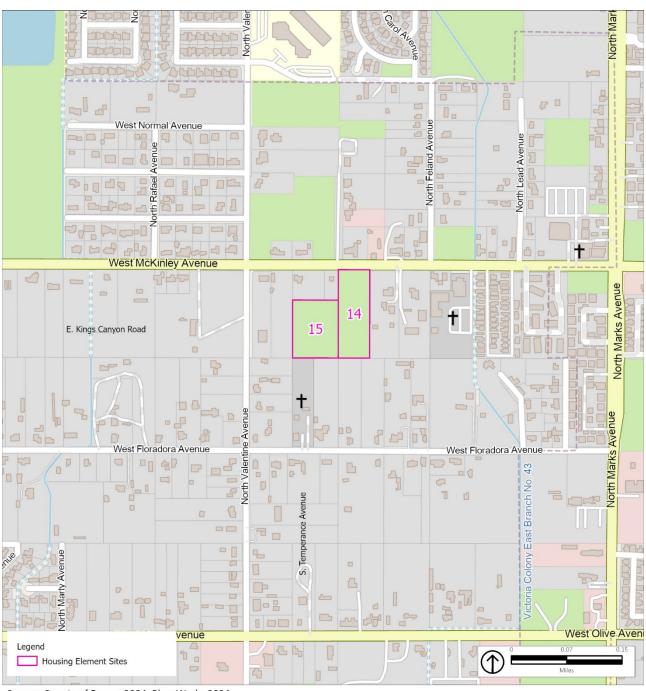


Figure 1A-5: Fresno SOI (West) Sites Inventory Map

Source: County of Fresno 2024, PlaceWorks 2024

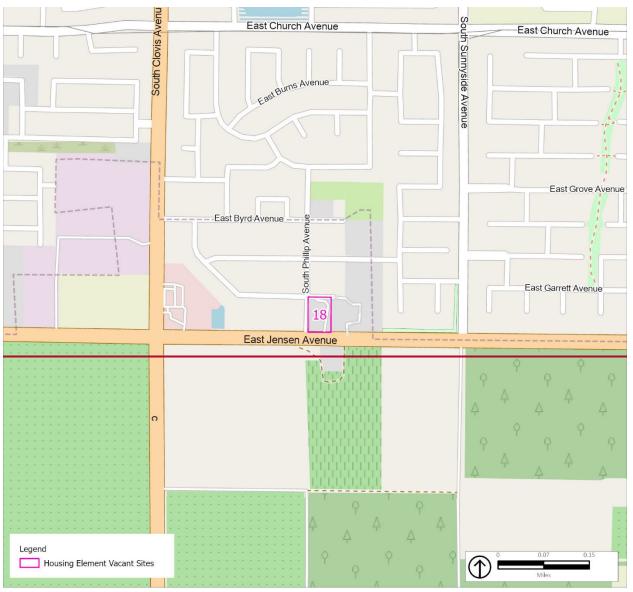


Figure 1A-5: Fresno SOI (Southeast) Sites Inventory Map

Source: County of Fresno 2024, PlaceWorks 2024

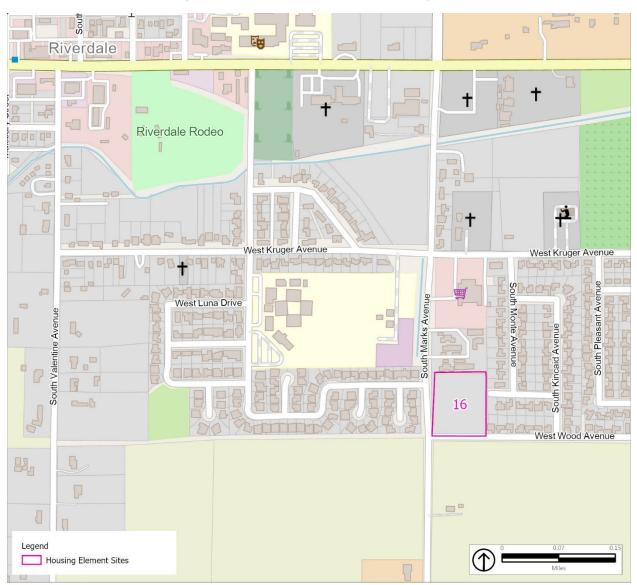


Figure 1A-6: Riverdale Sites Inventory Map

Source: County of Fresno 2024, PlaceWorks 2024

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SECTION 1A-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."¹

California Government Code Section 65583 (10)(A)(ii) requires local jurisdictions to analyze racially or ethnically concentrated areas of poverty and affluence, disparities in access to opportunity, and disproportionate housing needs, including displacement risk. Although this is the Housing Element for the County of Fresno, 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 County of Fresno identified factors that contribute to fair housing issues. These contributing factors are included in Table 1A-22, with associated actions to meaningfully affirmatively further fair housing related to these factors. Additional programs to affirmatively further fair housing are included in Section 1A-1, Action Plan.

This section also includes an analysis of the Housing Element's sites inventory as 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, <u>https://www.hcd.ca.gov/community-development/affh/docs/affh_document_final_4-27-2021.pdf</u>.

Outreach

Community Meetings

The County hosted three formal community meetings to initiate the Housing Element update process and solicit feedback from the community. Two in-person meetings were held, one on the evening of September 19, 2022, at Laton Elementary School and one on the evening of October 3, 2022, at Del Rey District Hall. The third meeting was held virtually via Zoom on October 12, 2022, to reach residents dispersed throughout the unincorporated county. For all three meetings, the County distributed flyers in English and Spanish to local school districts and water districts, through the Fresno County Housing Authority, County Facebook Page, email blast to 200+ interested community groups, residents, and listservs to regional stakeholders and community based organizations. Spanish language interpretation was offered for all three meetings, and at the in-person meetings refreshments and activities for children were made available to enable residents to attend who might otherwise be busy with children at home. The County also held an additional eight meetings for the General Plan Update in which comments regarding programs for the Housing Element were also received.

For the in-person meetings, Del Rey and Laton were selected for their locations and facilities that were suitable for public meetings. Del Rey was selected as a central location for the majority of the unincorporated population, and Laton was selected as a location that would be easily accessible for residents in Riverdale, Lanare, Raisin City, and Caruthers, as well as unincorporated residents that reside in the southcentral part of the county east of SR 99. Further, meetings were held by the Cities of Coalinga, Kerman, and San Joaquin, which are close to unincorporated communities in the most western and northwestern parts of the county.

Across all three meetings, participants raised similar concerns and identified similar needs. The primary issues raised that may pose barriers to fair housing compared to other jurisdictions, particularly incorporated jurisdictions, were a lack of housing in general as well as a need for a greater range of housing types to meet a variety of needs and reduce overcrowding that results from needing to live with other households to afford a home, a shortage of clean water to support existing communities, and a need for more community amenities such as grocery stores and parks. When asked what the most important considerations in future development should be, three of the top four answers were public safety infrastructure, job opportunities, and community amenities, indicating an existing shortage of accessibility to resources and infrastructure but a desire for greater connectivity. Participants also identified a need for more financial assistance programs for repairs and rehabilitation of homes and for first-time home buyers.

At the virtual meeting, participants also identified a need for farmworker housing in the form of singlefamily homes and expressed concern about the scarcity of water, citing a shortage of existing connections and little to no capacity for new connections. Generally, discussion at this meeting identified a desire for greater tenant protections, more resources and assistance for extremely low-income households and persons at-risk of homelessness to prevent displacement, and smaller and more affordable homes to alleviate overcrowding. Overall, residents from throughout the county expressed concern about access to resources in their communities, safety, and ability to buy or rent homes due to availability and costs.

Following the workshops, the County 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 and meaningful actions to address contributing factors and affirmatively further fair housing.

Study Session

A study session was held with the Board of Supervisors at the regular meeting on September 6, 2022, to discuss the Housing Element Update and process. The study session was open to the public and held in person. Commentary was limited and no public comment related to fair housing was received at the meeting, though the Board expressed concern over water supply and the County's ability to meet RHNA.

Consultations

During the Housing Element update process, staff reached out to stakeholder organizations to seek one-onone input on housing needs and programs in Fresno County. While most of these organizations serve the entirety of the county and did not focus on just the unincorporated county, the Leadership Counsel for Justice and Accountability (LCJA) shared insights on the experiences of residents and builders in the unincorporated county. Staff interviewed LCJA on August 26, 2022. During this interview, LCJA noted several key barriers to development and fair housing, including: a shortage of funding for both housing and programs to support current residents, concerns about the lack of availability of water and wastewater infrastructure, and housing conditions.

LCJA noted that due to limited zoning to permit multifamily housing, there is a shortage of these units, which are typically more affordable, in most unincorporated communities. Further, as the existing housing stock ages, housing conditions have become a greater concern, with many lower-income households living in units without adequate heating or cooling systems, or tenants in buildings without interior renovations to for suitable living conditions. LCJA noted that in some cases, older mobile home units were not correctly permitted and now current tenants are unable to complete necessary upgrades. As a result of these conditions, LCJA recommended the County seek additional funding for rehabilitation of ownership and rental units and establish a process to work with owners of mobile homes that need to be brought into compliance.

Overall, the shortage of housing, particularly affordable units, was reported to impact all households, but particularly farmworkers, seniors, and persons with disabilities. LCJA noted a shortage of homeownership units available and suitable for farmworkers, and a lack of supportive or accessible units for seniors and persons with disabilities overall throughout the unincorporated county, as most of these are located in incorporated jurisdictions. Due to the shortage of existing affordable units, and barriers to development, LCJA reported that there are high rates of overcrowding and residents living in substandard conditions.

They expressed a need to increase the allowed residential density in most communities, but particularly the Tombstone area and Lanare where multifamily uses are not currently allowed.

The primary barrier to development that LCJA noted for the unincorporated county, besides funding, is the availability of water and wastewater infrastructure. LCJA noted one instance in which an application for an affordable project was denied in Riverdale due to water shortages. In other instances, lengthy negotiation processes between cities and the County regarding infrastructure has delayed projects, noting a need for a more streamlined process in these situations. While the drought that results in water shortages is outside of the control of the County, LCJA recommended streamlined processes to prioritize affordable development in areas where water is available, and to seek funding to support infrastructure needs in other areas.

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.

Though the regional fair housing analysis completed for the multi-jurisdictional analysis was completed using the 2021 TCAC analysis, the County has opted to update the discussion of the TCAC analysis to consider both the 2023 and 2025 analyses in this local discussion of fair housing factors focusing on the unincorporated county. The regional analysis was completed at an earlier point in the update process, when 2023 and 2025 analyses had not yet been adopted. Methodology changes in more recent TCAC analyses have played a role in shifting designations, as will be discussed below. Additionally, the local analysis is what is considered when devising and evaluating the County's approach to affirmatively further fair housing while identifying housing sites to accommodate its RHNA. Additionally, due to the role of the TCAC analysis in funding affordable housing, the use of the most current designations informs the County's strategy in avoiding concentrating affordable housing in areas designated as having high segregation and

poverty, prioritizing investment in lower-resource areas, and supporting funding opportunities for affordable housing in higher resource areas.

In the 2023 analysis, tracts and block groups were first filtered for areas of high segregation and poverty, where 30 percent of the population was below the federal poverty line (\$27,750 annually for a family of four in 2022), and the analysis area had an overrepresentation of people of color relative to the population in the county as a whole. A Of the remaining tracts and block groups, areas designated as "highest resource" are-were the top 20% highest-scoring census tracts in the region. It is expected, indicating that residents in these census tracts have had access to the best outcomes in terms of health, economic opportunities, and education attainment. Census tracts designated "high resource" scored in the 21st to 40th percentile compared to the region. Residents of these census tracts have access to highly positive outcomes for health, economic, and education attainment. "Moderate resource" areas are were in the top 30% 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 are assumed to have access to either somewhat positive outcomes in terms of health, economic attainment, and education, or positive outcomes in a certain area (e.g., score high for health, education) but not all areas (e.g., may score poorly for economic attainment). Low-resource areas are were those that scored in the bottom 30% of census tracts and indicate a lack of access to positive outcomes and poor access to opportunities. The final designation are those areas identified as having "high segregation and poverty;" these are census tracts that have an overrepresentation of people of color compared to the county as a whole, and at least 30% of the population in these areas is below the federal poverty line (\$27,750 annually for a family of four in 2022).

The State updated its methodology in the 2025 analysis. Rather than assigning three index scores based on the environmental, educational, and economic conditions and distributing tracts evenly between the categories, tracts and block groups were assigned one point for each category where the tract or block group scored higher than the regional median. The total score was then assigned a category (e.g., three or fewer points were "low resource", 4 or 5 were "moderate resource", etc.). In regions with wide disparities between census tracts, the even distribution between categories used in the 2023 method may have showed higher resource levels when compared to the 2025 method. In addition, in the 2025 analysis, tracts could have a high segregation and poverty rating while also having a low, moderate, high, or highest resource designation. This change in methodology allows for a better understanding of where large income disparities may exist, or where high access to resources may exist alongside poverty and large populations of people of color.

As seen in Figure 3-1, Regional TCAC/HCD Opportunity Areas, in Section 3: Regional Assessment of Fair Housing, most of Fresno County, particularly in the incorporated cities, is primarily a mix of low-resource or moderate-resource areas and areas of high segregation and poverty, with pockets of high-resource designations. In the unincorporated county, high and highest resource areas are generally in the northeast and eastern portions of the county, including the unincorporated community of Squaw Valley, although most of the land is included within the Sequoia and Kings Canyon National Parks and is predominantly

rural and sparsely inhabited, with pockets of higher resource designations in the unincorporated communities of Caruthers and Riverdale along State Route (SR) 41. Lower resource and areas of high segregation and poverty are identified in the western unincorporated county. Moderate-resource areas are elsewhere, concentrated west of Fresno and within the triangle formed by SR 41, the southern boundary of the county, and SR 99. Given that much of unincorporated county is sparsely populated, with large agricultural and natural open space areas, the low- and moderate-resource areas may not accurately represent the access to opportunities for residents of unincorporated communities, where there is typically a concentration of resources.

Patterns of Integration and Segregation

During the <u>beginning of the</u> preparation of this section of the Element (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, during the Housing Element update process, the AFFH Data Viewer was updated with the 2022 TCAC/HCD Opportunity Map followed by the subsequent 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. several analyses have been released by the UC Berkeley Othering and Belonging Institute that have updated the categories assigned to each census tract or block group. Because of the role that TCAC scores can play in the development process, particularly for affordable housing projects, the discussion of this data was revised to the adopted 2025 analysis. The 2023 analysis was also discussed as a point of comparison to show changes over time.

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 based on 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.

The unincorporated county is categorized by census tract with one of four TCAC/HCD resource designations (low, moderate, high, and highest), as well as areas designated distinctly as areas of high segregation and poverty. In prior analyses, areas of high segregation and poverty were considered a resource designation, whereas in the current analysis, areas of high segregation and poverty are a separate designation that can be combined with other designations. For example, a census tract to the west of Fowler was designated a moderate resource area but was also identified as an area of high segregation and poverty. Some census areas are also identified as having insufficient data due to unreliable data, very low population or population density, or high rates of residents that are presently living in institutional facilities (e.g. incarcerated individuals) or employed by the armed forces. Rankings are made in comparison to other communities in the region rather than the state as a whole, in order to more closely match affordable housing funding programs. Urbanized areas around cities, including unincorporated areas in and around the Fresno SOI, are compared to other rural communities in the county. The following analysis uses the term "regional median" to refer to the appropriate urban or rural geographic comparison, which aligns with the approach used in the TCAC December 2024 methodology.

Generally, lower to moderate resource designations are found in western Fresno County and in the area surrounding the City of Fresno, and high and highest designations in eastern Fresno County. At a high level, these patterns remained the same in the 2022 when comparing 2023 and 2025 COG Geography TCAC/HCD Opportunity Maps. However, in 2025 more communities in western Fresno County are considered to have insufficient data to be ranked, and more unincorporated areas in the western areas of the county are considered areas of high segregation and poverty. High segregation and poverty areas in the western part of the county include areas north of Huron, the Raisin City area, and areas west of Mendota. when When looking more closely, the communities of Laton, RiverdaleDel Rey, and Biola received significantly different designations between the two iterations of the Opportunity Maps, while all others largely remained the same or experienced only small changes.

In the 2021 maps, Laton was designated an area of high segregation and poverty, whereas in 2022, it is designated as high resource. However, the designation of high segregation and poverty is reliant on the proportion of the population that identifies as non-White and poverty rates, whereas the high resource designation considers a wider range of factors, including environmental, economic, and educational opportunities. Therefore, these designations are not necessarily mutually exclusive. Given this, this

Assessment of Fair Housing considers the full scope of fair housing indicators for which data is available to assess segregation patterns throughout the county, including Laton.

In contrast, <u>T</u>the designation for Biola shifted from <u>moderate</u>/high resource in <u>2021-2023</u> to low resource in <u>20222025</u>. However, the indicators of quality of life that likely informed the <u>2021-2023</u> designation have not changed significantly across this time period. Data analyzed throughout this Assessment reports a moderate to median income, high homeowner occupancy with lower overpayment rates, moderate poverty rates, <u>high anticipated economic outcome (86th percentile)</u> and moderate environmental scores in Biola, all of which would support a moderate or high resource designation when compared to similarly sized and placed jurisdictions in the San Joaquin Valley. <u>In the 2025 TCAC analysis, rates of math proficiency and students not in poverty in Biola are higher than the regional median</u>. However, with the shift in geographic comparison area for 2022, Biola was compared to incorporated areas in Fresno County, including Clovis and Fresno. As a smaller unincorporated community, Biola has more limited resources when compared to these areasincorporated areas such as Clovis and Fresno, which are included in the regional comparison. However, when looked at more holistically, Biola has stronger indicators of opportunity than many unincorporated communities in Fresno County and elsewhere in the larger region. Therefore, the 2021 designation has been used for this analysis.

Finally, Riverdale did not have a designation in 2021 due to missing or insufficient data but received a moderate designation in 2022. As this Assessment looks at indicators of fair housing beyond the TCAC/HCD Opportunity Maps, the lack of data in 2021 did not limit the analysis. Therefore, to remain consistent with all other areas of the unincorporated analysis, which were analyzed using the 2021 TCAC/HCD maps, Riverdale was analyzed using a variety of data sources but not the TCAC/HCD maps.

The community of Del Rey was identified as an area of high segregation and poverty in 2023, but a moderate resource area in 2025. In the 2025 analysis, high segregation and poverty designations were separated from resource area designations, and Del Rey was not identified as an area of high segregation and poverty. As of 2025, the community has a higher employment rate, a higher percentage of students not in poverty, and a higher high school graduation rate than the regional median.

For each of these communities, and the full extent of the unincorporated county, it is worth noting that the use of the TCAC/HCD Opportunity Maps are just the serve as an initial 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.

Income Distribution

The TCAC/HCD Opportunity Maps can help to identify areas within the community, particularly in an area as vast as the unincorporated county, that provide stronger access to economic, environmental, or educational opportunities for residents or, conversely, provide more limited access to opportunities. 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.

As seen in Figure 1A-79, most of the unincorporated county is designated as low resource, moderate resource, or area of high segregation and poverty west of SR 99. However, in the unincorporated county west of the City of Fresno to areas surrounding the City of Kerman, and inclusive of the unincorporated community of Biola, a combination of low, moderate, high, and highest-resource designations is found. Additionally, moderate high and highest resource designations are identified along the east side of SR 41 around the unincorporated communities of Caruthers and Riverdale to the southern border of the county, though many unincorporated communities in these areas did not have enough population to be given a designation in 2025. In the unincorporated county east of SR 99, the majority of the land is designated moderate, high- and highest-resource areas north of the cities of Fresno and Clovis and east towards the Sequoia National Park, with pockets of areas of high segregation and poverty surrounding the City of Orange Cove; and in between, east of, and surrounding the cities of Sanger and Parlier, including the unincorporated community of Del Rey. The area within the triangle formed by the cities of Selma, Kingsburg, and Reedley is identified as high-mostly moderate resource, with some low resource areas in the area surrounding Parlier. The unincorporated county just south of the city of Fresno on both sides of SR 99 is designated low resource, and there are six-pockets of unincorporated islands within the central and southern portion of the city limits which are predominantly low resource and areas of high segregation and poverty, reflecting characteristics in adjacent city land. In the northern portion of the City of Fresno, there are a number of unincorporated county islands primarily designated moderate, highest and high resource, with moderate-resource designations along the eastern edge of the islands closest to SR 41.

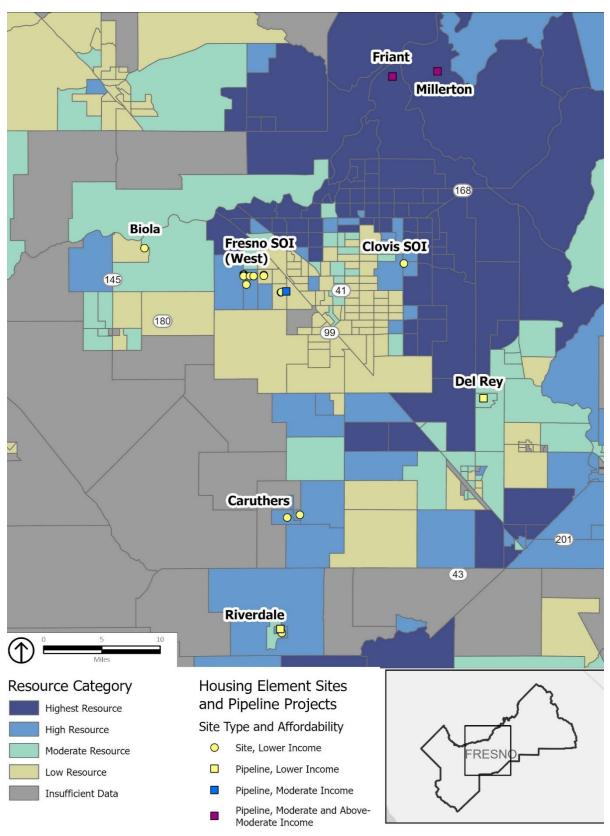


Figure 1A-79: Local TCAC/HCD Opportunity Areas, 20212025

Source: California Tax Credit Allocation Committee and HCD, 20212025; County of Fresno, 20232025.

<u>Note:</u> Entitled single-family home sites are also included to meet the County's above moderate-income RHNA and distributed throughout the county. These sites are not shown on AFH maps.

Given that much of the unincorporated county is sparsely populated, with large agricultural and open space areas between more populated community centers, the low- and moderate-resource areas may not accurately represent the access to opportunities for residents of the unincorporated communities, where there is more likely to be a concentration of resources. However, there are large tracts in central Fresno County in the vicinity of the unincorporated communities of Raisin City and Helm, the Lemoore Air Base adjacent to the unincorporated community of Five Points, and connecting the cities of Firebaugh and Mendota that are designated in 2021 as areas of high segregation and poverty-were not assigned a designation in 2025 due to low population density in the tract or block group (below 25 people per square mile and total population below 750) and/or unreliable data. Tracts or block groups with high rates of residents that live in institutional facilities or employment in the armed forces were also not assigned a category in the 2025 analysis.

The unincorporated county includes the census-designated places of Biola, Caruthers, Friant, Riverdale, Shaver Lake, and Squaw Valley, as well as the unincorporated communities of Auberry, Cantua Creek, Laton, Tranquillity, Helm, and Prather. Due to small population sizes, the American Community Survey (ACS) does not provide estimates of the median income of several census-designated places in the unincorporated county. However, the median income within the unincorporated county is estimated at \$62,571, this is above the countywide median that includes the incorporated area, and second-highest jurisdictional income in the county after the City of Kingsburg. In the unincorporated county, 12.2% of households make less than 30% AMI, which is considered extremely low-income. The ACS estimates that of approximately 35.7% of households in the unincorporated county are lower income, earning less than 80% of the AMI.

In general, median household income by census block group reflect those patterns in adjacent block groups within incorporated communities (see Figure 1A-<u>8</u>10). In many cases, block groups with particularly high or low median incomes that include incorporated areas also extend into the unincorporated county, making it difficult to determine whether median household income for the block group reflects incomes for residents within or outside of the incorporated areas, although residential areas within incorporated jurisdictions are typically denser, indicating that data on these block groups may more accurately reflect conditions for residents of the incorporated jurisdiction. The majority of the unincorporated county west of SR 99 has median incomes between \$30,000 and \$87,500 (state median income), though the eastern portion of the unincorporated county reports a range of median income, with the highest (\$87,100 to \$125,000) east and northeast of the City of Clovis, between the cities of Kingsburg and Selma, and in the unincorporated county islands within the City of Fresno.

Block groups in the unincorporated county (entirely outside of any incorporated jurisdiction) with particularly high median incomes include Squaw Valley (\$85,132), Friant (\$90,982), and Shaver Lake (\$107,813). Several tracts have median incomes below the statewide average, including Prather (\$72,390), Auberry (\$56,375), western portions of Caruthers (\$56,179), northern and eastern portions of Riverdale (\$53,587). Unincorporated communities with lower median incomes include Del Rey (\$26,193), Laton (\$30,203), Cantua Creek (\$36,364), Tranquillity (\$39,044), Caruthers (\$39,327), and Biola (\$50,985).

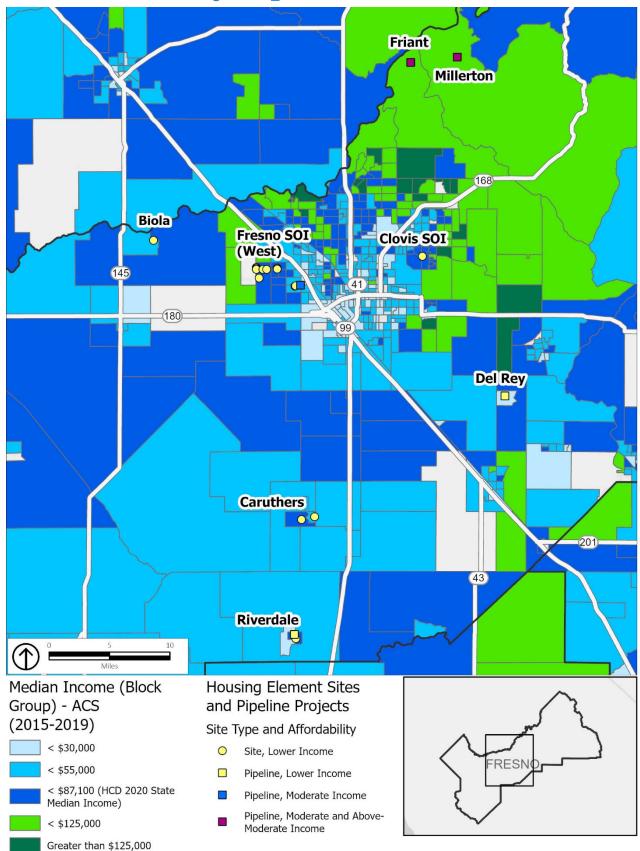


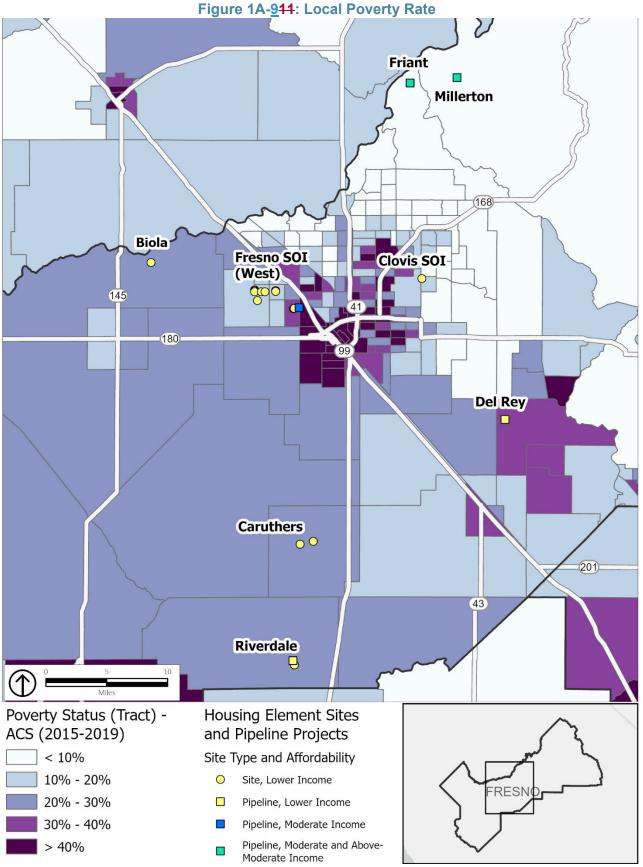
Figure 1A-840: Local Median Income

Source: ACS (2015-2019); County of Fresno, 2023.

Very few of the county's lowest-income census tracts are found in the unincorporated county. Further, income patterns in the unincorporated county generally correspond to nearby sections of incorporated communities. However, the areas designated as TCAC/HCD areas of high segregation and poverty, which in 2021 included large tracts within the unincorporated county, report high rates of poverty.

In 2021, there were several census tracts with elevated poverty rates over 40% found within the unincorporated county that correlate to areas designated as high segregation and poverty in the vicinity of the jurisdictions of Huron, Orange Cove, Fresno, Sanger, and Mendota (see Figure 1A-911). Most of the western and central unincorporated communities experience poverty rates between 20 and 40%; however, the expansive area north of the City of Coalinga has a lower poverty level of 12.6%, comparable to rates within the adjacent jurisdiction. In the more populated areas in the vicinity of the jurisdictions of Fowler, Selma, Reedley, and Kingsburg along SR 99 and SR 41, the poverty rate generally falls between 10 and 20% surrounding the city boundaries. However, in 2021, the unincorporated tracts between the cities of Sanger and Parlier reflect the poverty rate within the jurisdictions and the high segregation and poverty designations, with poverty rates above 30.0%. In contrast, poverty rates in the eastern portion of unincorporated community of Clovis, are well below 10%, and poverty rates in the vicinity of the unincorporated community of Squaw Valley within the 10% to 20% range.

The spatial distribution of median household income and poverty in the unincorporated county has not shifted substantially between 2014 and 2020, although the median incomes have increased throughout the majority of the unincorporated county. Higher-income census tracts are found primarily east of the cities of Fresno, Reedley, and Clovis, west of the northern portion of the City of Fresno, and north of the City of Kingsburg. Areas to the east and north of the City of Clovis that have been identified as racially concentrated areas of affluence (RCAA), with additional description later in this assessment, and includes the unincorporated community of Friant. Lower-income unincorporated census tracts are primarily found west of SR 99. This confirms that the unincorporated county has distinct higher- and lower-income areas, the boundaries of which have been generally consistent over time.



Source: ACS (2015-2019); County of Fresno, 2023.

Racial and Ethnic Characteristics

The unincorporated county's largest demographic group is Hispanic, comprising 50.3% of the population, with 36.8% of the population identifying as White Non-Hispanic, indicating that unincorporated communities are generally less diverse than most incorporated jurisdictions. Approximately 7.2% of the population in the unincorporated county identifies as Asian, higher than all other incorporated jurisdictions except for Kerman, Fresno, and Fowler. Similarly, 3.5% of the population in the unincorporated county identifies as Other Race or Multiracial Non-Hispanic, the highest rate of these groups with the exception of the cities of Kingsburg and Fresno. Other demographic groups, including American Indian/Alaskan Native are represented by smaller populations, each less than 1.4% of the unincorporated county population.

As shown in Figure 1A-102, there are variations in the distribution of the non-White population in the unincorporated county. Census tracts to the west of SR 99 are generally made up of non-White populations above 61.0%. High rates of non-White populations are also found in tracts adjacent to and included within city boundaries of Kerman, Sanger, Parlier, Selma, Reedley, and Orange Cove, as well as the western and southern unincorporated county surrounding the City of Fresno. Outside of this area, census tracts in northeastern and eastern unincorporated county tend to be less diverse than those found in cities, with predominantly White Non-Hispanic populations, and populations of color representing less than 30% of the total tract population. The unincorporated county's highest-income tract around Shaver Lake is also its least diverse, with 8.1 to 18.4% non-White population at the block group level.

The spatial distribution of non-White residents in the unincorporated county has not changed substantially over the past decade. Non-White residents are found at higher proportions within cities, and, while Fresno County as a whole has generally become more diverse, and the Hispanic population has increased the most noticeably, unincorporated communities with relatively higher diversity in 2014 remain relatively more diverse, and areas of relatively less diversity in 2014 remain the county's relatively less diverse areas.

As of the TCAC/HCD 2023-2025 COG level-analysis, areas of high segregation and poverty in Fresno County are primarily in incorporated jurisdictions or immediately surrounding incorporated jurisdictions, notably several in the City of Fresno, the entirety of the City of Orange Cove, much of Parlier, and one census tract in each in the cities of Huron, Reedley, Selma, and Sangerpart of the community of Selma. While tracts that overlap with these cities may include unincorporated areas, the data generally reflects the conditions and characteristics of residents in the adjacent cities. Further west, areas in and around the cities of San Joaquin and Mendota areas around the unincorporated community of Raisin City and to the southwest of this community -are considered areas of high segregation and poverty. This categorization is likely due to the concentration of lower-income households, agriculturally focused jobs that often have low wages, and high proportion of non-White residents in these areas. The high occurrence of these areas of high segregation and poverty is consistent with patterns seen in other relatively low-income counties with agricultural economies, such as Riverside and Imperial Counties.

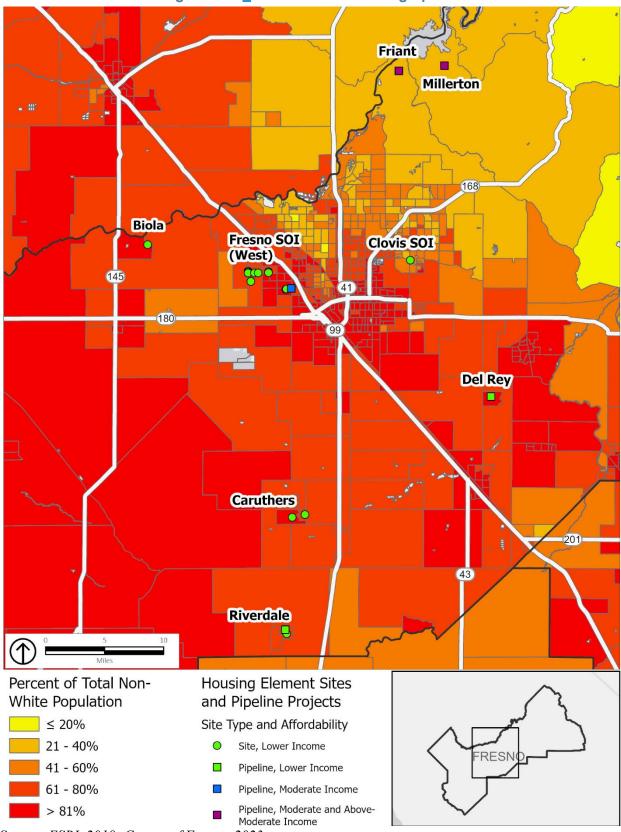


Figure 1A-102: Local Racial Demographics

Source: ESRI, 2018; County of Fresno, 2023.

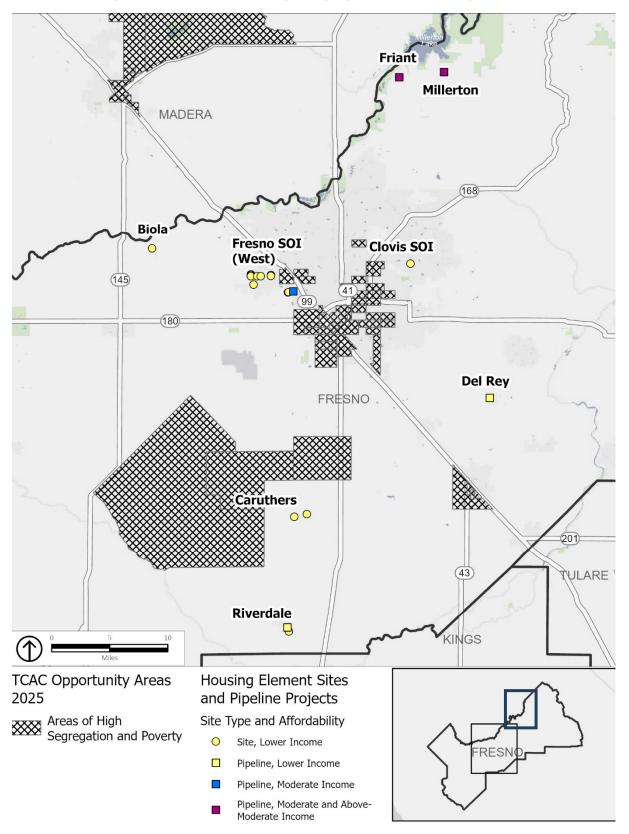


Figure 1A-113: Areas of High Segregation and Poverty, 20232025

Source: California Tax Credit Allocation Committee, 20232025; County of Fresno, 20232025.

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In contrast, there are also RCAAs found in the unincorporated county northwest of the City of Clovis, and within seven of the unincorporated islands in the City of Fresno (see Figure 1A-124). These areas have non-White populations between 20 and 40% of the total population and median incomes generally above \$85,000 up to \$120,774. The RCAAs generally coincide with TCAC/HCD highest-resource areas and/or relatively higher-income parts of the unincorporated county. It should be noted that some of the RCAAs encompass large census boundaries and may not communicate geographic patterns of where the concentration occurs. For example, the Friant community is in an RCAA (coterminous census tract/block group) that contains 635 households spread across 24.9 square miles. However, 256 of those households reside within the 1.3-square mile Friant community (Friant is a census designated place (CDP)) and the balance of 379 households is spread broadly across the remaining 23.6 square miles (confirmed with block-level data). While the overall area is reported to have a median household income of \$90,982, the Friant community's median household income is \$56,154 (using the same 2015-2019 dataset as is mapped), indicating that the area around the Friant community is not an RCAA.

In contrast, within the census tract where the Millerton community is located, which is not considered an RCAA, wealth appears to be concentrated in the Millerton CDP rather than in the tract. In 2021², the Millerton CDP had a median household income of \$179,779 while the census tract where Millerton is located had a median household income of \$58,750. The community of Millerton had 216 households, while the tract as a whole had 903 households. Though this is a smaller share of households in the Millerton area compared to the Friant area, the income difference between the Millerton CDP and its overall tract suggests that the Millerton CDP could be considered an RCAA in the context of the AFFH sites analysis.

Familial Status

Much like the incorporated cities of Fresno County, the majority of households in the unincorporated county are family households (81.4%). Family households are defined by California law as a household of two or more persons, regardless of relationship status. In contrast, approximately 19.3% of households in the unincorporated county consist of residents living alone and 15.4% of households are headed by single adults. Children living in the unincorporated county's single-parent, female-headed households may have more limited access to resources and opportunities as compared with children living in married-couple households.

The unincorporated county has a comparable rate of female-headed households to incorporated areas, at 19.4% of households. Of female-headed family households in the unincorporated county, 17.2% include own children, 29.4% include other relatives or non-biological children, and 2.6% include housemates. Within the unincorporated county, 28.3% of female-headed households include children and have a household income below the poverty line. The spatial distribution of single-parent, female-headed households with children as a percentage of total households correlates with TCAC/HCD Opportunity Area designations, with the lower-resource and high segregation and poverty-designated areas having higher rates of female-headed households than are found in higher-resource areas (see Figure 1A-135). However, in contrast with this pattern, much of the unincorporated county east of the cities of Clovis, Reedley, and

² 2017-2021 ACS data was used for this comparison because Millerton only existed as a CDP beginning with the 2020 census, so CDP data for Millerton was not tabulated in the 2019-2019 ACS.

Fresno also have proportions of single, female-headed households with children at rates between 20% and 40%.

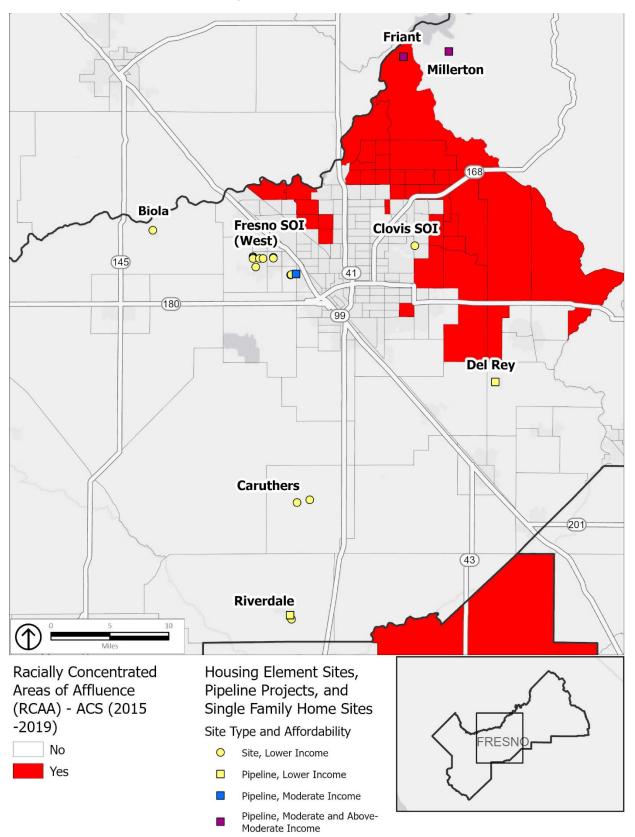
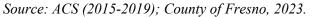


Figure 1A-124: Local RCAAs



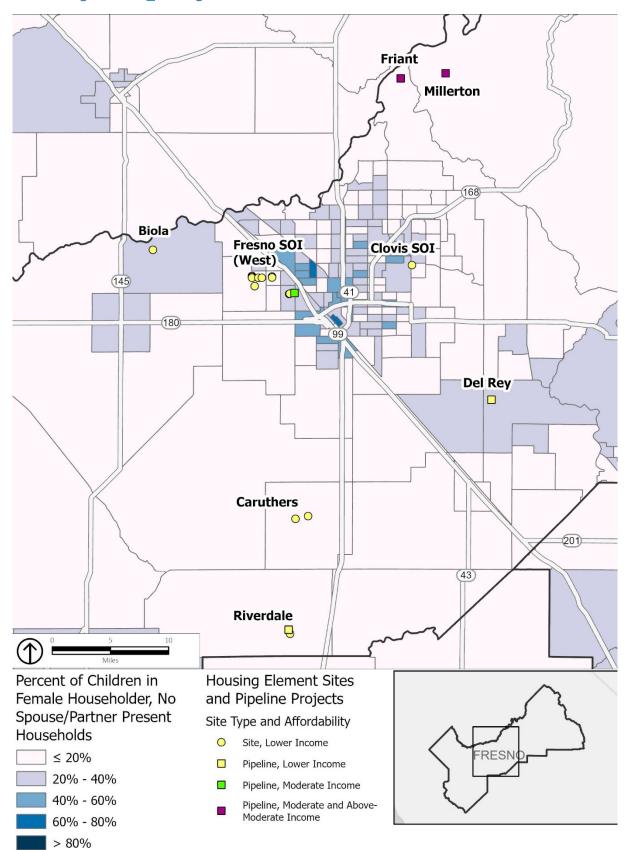


Figure 1A-135: Single-Parent Female-Headed Households with Children

Source: ACS (2015-2019); County of Fresno, 2023.

Disability Rates and Services

Approximately 13.6% of unincorporated county residents live with one or more types of disability, close to the countywide rate of 12.9% and the state rate of 9.6%. The spatial distribution of unincorporated county residents living with disabilities appears to be higher closer to the more populated jurisdictions along SR 99, with rates between 10 and 20% from the SR 99 to the census tracts from Firebaugh to the Lemoore Naval Air Station in Kings County (see Figure 1A-146). The far western portion of the county has disability rates below 10% to the boundary with San Benito and Monterey Counties. All of the unincorporated county east of the City of Clovis and Fresno, with the exception of a few census tracts adjacent to the City of Clovis' boundaries, have disability rates between 10 and 20% of the population. However, the proportion of seniors is higher in these areas, likely due to the location of retirement properties. As such, given the typical relationship between the higher proportion of seniors and higher rates of disabilities, higher rates of disabilities in these areas are likely associated with seniors retiring in these rural areas. Generally, census tracts in unincorporated county see lower rates of disability than tracts in cities.

As shown on Table 2-32, Disability by Type (2020) in Section 2, Housing Needs Assessment, ambulatory disabilities were the most prevalent disability type in the unincorporated county, reported by 48.1% of the population with a disability. Independent living difficulties were reported by 38.3% of persons with disabilities, followed by cognitive and hearing difficulties at 35.7 and 34.5%, respectively. The unincorporated county has a very small population of residents with developmental disabilities (less than 1.0% of total population), of which approximately 55.0% are under 18 years of age and live at home, with parents or a caregiver.

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

For seniors and other persons requiring a supportive housing setting, there are 210 licensed care facilities in Fresno County with 4,953 beds. However, none of these facilities are in the unincorporated county, which may push aging households into cities as their need for care increases. Operating care facilities in rural unincorporated areas is more difficult compared to urbanized areas based largely on the incredibly dispersed geographic distribution of potential residents and distance from medical facilities.

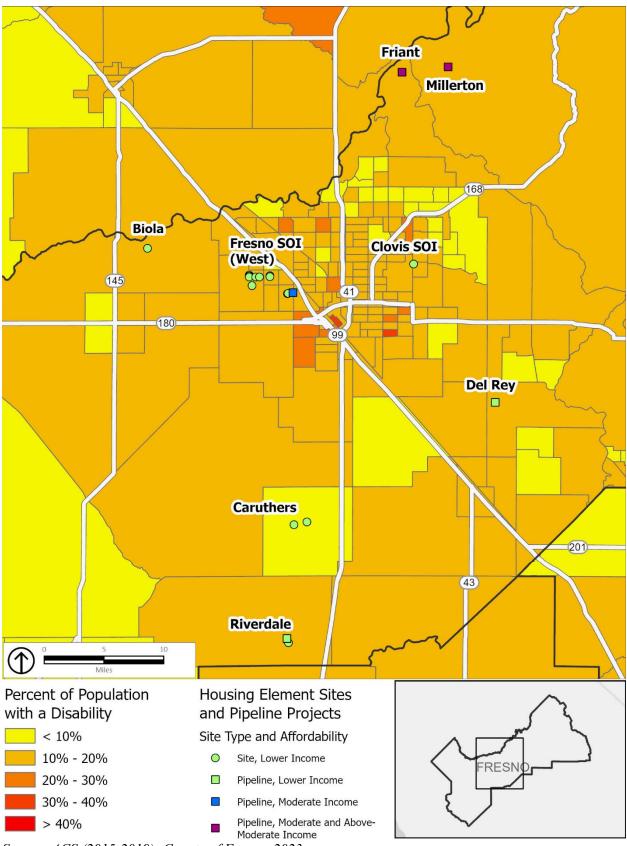


Figure 1A-146: Population with a Disability

Source: ACS (2015-2019); County of Fresno, 2023.

Access to Opportunity

Transit Mobility

Transit mobility refers to an individual's ability to navigate the community and region on a daily basis to access services, employment, schools, and other resources. Indicators of transit mobility include the extent of transit routes, proximity of transit stops to affordable housing, and frequency of transit.

The Fresno County Rural Transit Agency (FCRTA) offers a variety of transportation programs that are available to riders in unincorporated county. Most FCRTA lines serve over 25 unincorporated communities, including: Alder Springs, Auberry, Burrough Valley, Cantua Creek, Caruthers, Del Rey, Dunlap, Easton, El Porvenir, Five Points, Friant, Halfway, Jose Basin, Lanare, Laton, Marshall Station, Meadow Lakes, Mile High, Miramonte, New Auberry, O'Neills, Pinehurst, Prather, Raisin City, Riverdale, Squaw Valley, Sycamore, Three Rocks, Tollhouse, Tranquillity, and the American Indian Rancherias of Big Sandy, Cold Springs, and Table Mountain. Each of FCRTA's intercity buses are equipped with parcel and bicycle racks, and all vehicles are wheelchair lift equipped. Rates vary by route and distance, but all routes offer discounted fares for seniors. Additionally, FRCTA recently started an electric car rideshare service for the community of Biola, with fares that are 50% subsidized (ADA attendance ride for free), and a driver hiring program with a preference for Biola residents.

The Senior Taxi Scrip Program, administered by the Fresno Council of Governments (FCOG) provides reliable and affordable transportation to Fresno County residents who are 70 years of age and older. Eligible seniors receive a 75% discount on taxi fares by purchasing scrip. Taxi Scrip can be used at any time, 24 hours a day, and 7 days a week when needed, and never expires, providing a reliable and affordable transportation option for seniors throughout the county.

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 city, county, and regional levels. AllTransit scores geographic regions (e.g., cities, counties, Metropolitan Statistical Areas [MSAs]) on a scale of 0 to 10, with 10 being complete transit connectivity. Figure 1A-157 depicts Fresno County's AllTransit Performance score, including metrics representing average household transit access. Fresno County's overall score is 3.2, demonstrating "low" connectivity. It is important to note that this score is for Fresno County as a whole, including incorporated areas, as AllTransit does not provide a score just for the unincorporated county. Fresno County's score is consistent with comparable counties, which are typified by rural and semi-rural communities. However, the AllTransit methodology, which determines scores according to an "average" household, may not fully represent transit availability in the unincorporated areas, as the estimate is an average of both incorporated and unincorporated areas. As is shown in Figure 1A-168, much of FCRTA's rural transit connectivity is focused on moving people between cities rather than within cities. Many unincorporated areas in the central areas of Fresno County are not served by rural transit, with the exception of the Caruthers area. However, sites that are just outside of the City of Fresno are able to use the Fresno Express transit system to access resources within the city boundaries.

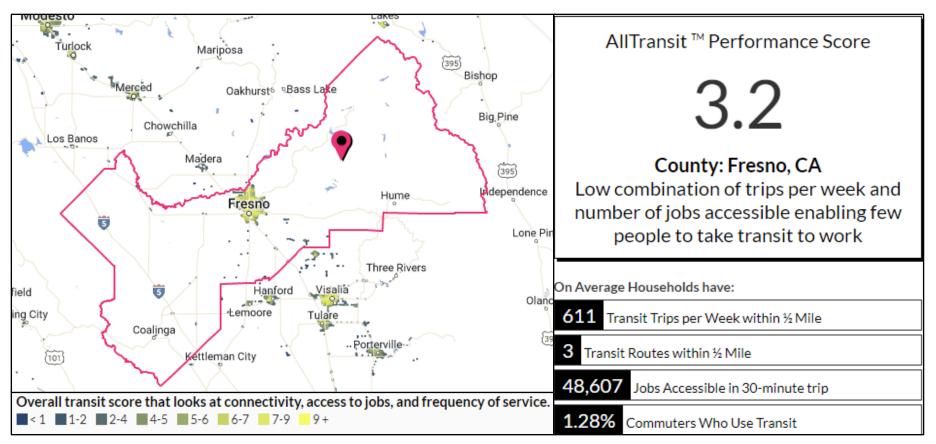


Figure 1A-157: Fresno County AllTransit Performance Score

Source: AllTransit.cnt.org, 2022

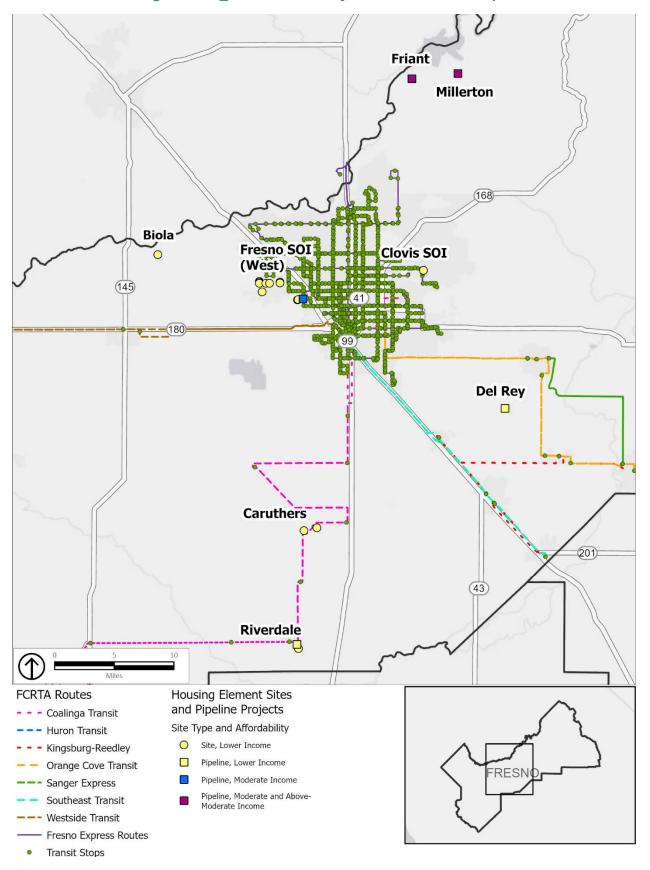


Figure 1A-168: Fresno County Bus Routes and Stops

Source: FCRTA, 2023; Fresno Express, 2023; Caltrans, 2022; County of Fresno, 2023.

Housing Mobility

Approximately 31.1% of occupied households in the unincorporated county are renter-occupied. 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 12.2% in the unincorporated county. Vacancy data is not available by tenure through the DOF; however, the 2020 ACS 5-year estimate indicates a rental vacancy rate of 3.6% and an ownership unit vacancy rate of 1.4%, with an overall vacancy rate (once seasonal vacancy is included) of 12.4%. A healthy vacancy rate is generally considered to be around 5%. 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 indicating approximate conditions in the local housing market.

In communities in or around the Sierra National Forest, like Auberry, Shaver Lake, and Squaw Valley, there are hundreds of vacant units and the majority or all the vacant units are used for seasonal recreational use. Throughout most of the other unincorporated communities a sizeable or majority of vacant units were recorded as being "other vacant," a category of properties which are vacant but not immediately available for rent or purchase. Properties may be categorized as "other vacant" due to one or more factors, which may include ongoing legal proceedings, active renovation or repair, abandonment, or an owner's preference for vacancy, among other potential factors. 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 those units immediately available for rent or purchase.

The unincorporated county's 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 the unincorporated county for prospective homebuyers. However, the unincorporated county's vacancy rates are consistent with several other comparable Fresno County jurisdictions (see Section 2, Housing Needs Assessment).

While median rent data and Housing Choice Voucher usage data is not available for the unincorporated county, Section 2, Housing Needs Assessment, Table 2-22, Home Sales Recorded in 2021-22, reports that home prices in several unincorporated communities fluctuated between 2021 and 2022, with some communities seeing increases and some decreases. However, most communities only saw sale counts of between 2 and 7 homes, with Shaver Lake and Friant seeing sale counts of 13 and 14, respectively. In Shaver Lake, home prices remained consistent, while in Friant, the average sale price decreased by 32.9%.

A shortage of available housing units for rent and for sale may indicate limited mobility options for prospective and existing unincorporated county residents seeking ownership opportunities.

Employment Opportunities

The United States Department of Housing and Urban Development (HUD) jobs proximity index measures employment accessibility in residential areas 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. The jobs proximity index demonstrates a pattern by which areas of the unincorporated county that are closer to urban job centers, like the City of Fresno, or are closer to highways and transit linkages providing access to these job centers score higher than isolated rural areas (see Figure 1A-1<u>7</u>9). Census tracts along SR 99 and SR 41 score highly, generally to the south and southwest of SR 99. The unincorporated county to the east and northeast of SR 99, in more mountainous and sparsely populated areas of the county, see the lowest scores. Similarly, Longitudinal Employer-Household Dynamics (LEHD) data indicates that jobs in the unincorporated county are concentrated in the central part of the county closest to the SR 99 corridor, with jobs distributed across agricultural and industrial areas lying between urban nodes. Additional clusters of jobs are found in and around Squaw Valley and Auberry, with fewer jobs found in the western side of the county. <u>However, it is worth noting that the index's model may not accurately reflect the proximity to employment opportunities of residents of areas immediately to the west of Fresno. This may be reflective of smaller employment, or may indicate a larger labor force in this area of the city.</u>

In the unincorporated county, the primary industries include agriculture, agribusiness, and natural resource extraction. Access to employment opportunism for unincorporated residents is highly dependent on the location of those residents in relation to job centers, which are primarily found in or close to incorporated areas. According to the 2016-2020 ACS, the labor force participation rate in the unincorporated county is approximately 60.8%. Unincorporated lands are predominantly agricultural in nature. Aside from educational and a limited amount of service/retail jobs, the lack of population density and infrastructure in the unincorporated county largely prevents any other job opportunities from becoming viable. Limited access to jobs that are not agriculture-related may prevent workforce-age persons and households from residing in unincorporated communities. Due to the primarily rural and sparsely populated nature of the unincorporated county, extending access to affordable housing and transit opportunities in remote areas will help ensure that residents are experiencing adequate access to employment opportunities.

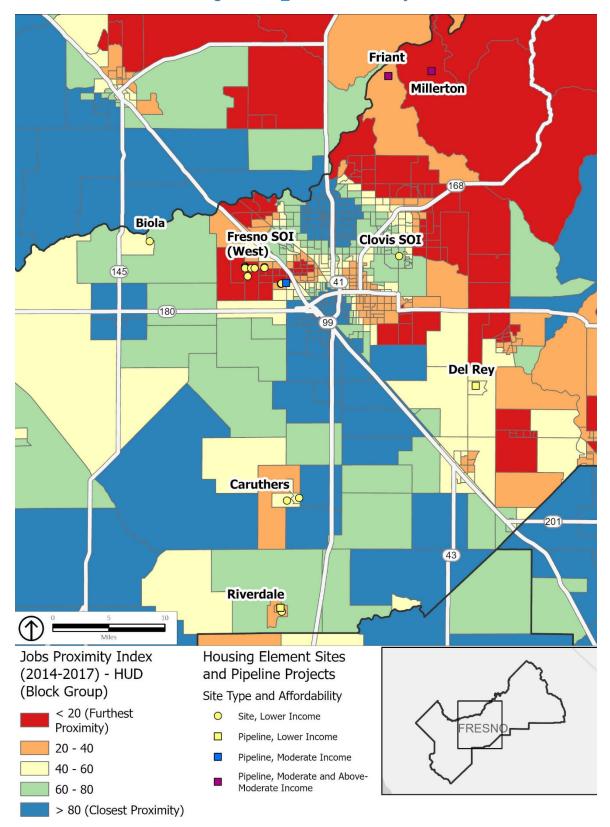


Figure 1A-179: Jobs Proximity Index

Source: U.S. Department of Housing and Community Development (2014-2017); County of Fresno, 2023.

Educational Opportunities

Most schools in Fresno County are in incorporated jurisdictions. Students living in the unincorporated county are served by several school districts, as demonstrated in Figure 1A-1820. While the service area of many of the school districts is geographically large, particularly in the eastern county, most have schools in areas where there is the greatest need, and many schools in isolated areas are K-12. In 2019, the Department of Education (CDE) reported on 40 public schools in the unincorporated county, as identified in Table 1A-10. School performance varies between unincorporated communities. Communities in the south/central section of the county, as well as in isolated areas in the western county, tend to see lower median incomes compared to communities in the central and northeast sections of Fresno County, where communities radiate outward from the City of Fresno and tend to be denser, relatively higher-income, less affordable, and closer to jobs and major arterial roads. Schools in the relatively lower-income unincorporated communities also tend to see lower performance scores - these include schools in and around the communities of Laton, Riverdale, Burrel, Caruthers, Bowles, Raisin City, Five Points, Helm, Cantua, Tranquillity, Navelencia, and Dunlap. Conversely, schools in unincorporated communities that see higher scores include areas in and around Fairmont, Sunnyside, Clovis, and Reedley. These unincorporated communities are in higher-income, northeast parts of the county, in and around the City of Fresno, or in the sphere of influence of incorporated jurisdictions.

The proportion of students in schools in the unincorporated county who are socioeconomically disadvantaged is typically comparable to Fresno County's relatively lower-income incorporated communities. Similarly, the proportion of students who are English-language learners is comparable to Fresno County's lower-income incorporated communities. Unincorporated communities that are closer to the City of Fresno are an exception, including the communities of Sunnyside, Clovis, and Fairmont, which are higher-income unincorporated communities where fewer students are socioeconomically disadvantaged and/or English language learners. These schools tend to outperform other schools in unincorporated communities. Many schools, particularly in lower-income areas of the western county where rates of English-language learning students are high, have information on their websites in both English and Spanish to meet the linguistic needs and preferences of students and their families.

While the anticipated educational outcomes, according to TCAC/HCD, tend to be higher in the central and eastern portions of the county, this area is more urbanized or suburban and sees higher incomes as compared to the primarily rural and agricultural areas at the eastern and western extremities of the county. The areas west of the City of Fresno with the lowest educational scores are largely open space and agricultural land. In an urban area, a shortage of educational opportunities may present a barrier to families with children to live there. However, in rural and agricultural areas, such as far western and eastern Fresno County, land uses are not conducive to centralized urban areas and are instead focused on agricultural uses. Educational opportunities are available within all incorporated jurisdictions, and each school district extends beyond city limits into the unincorporated county to serve residents of these areas.

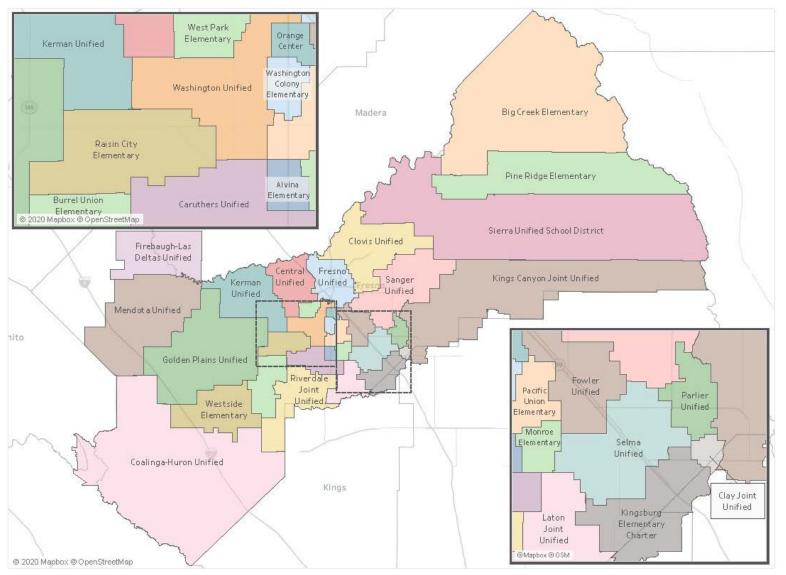


Figure 1A-1820: School Districts in Fresno County

Source: Fresno County Superintendent of Schools, 2020; accessed November 2022

School Name	Community	ELA Score	Math Score	Chronic Absenteeism Rate	Suspension Rate	Socioeconomically Disadvantaged	Foster Youth	English Learners
Centerville Elementary	Centerville	-5.2	-23.7	2.4%	0.0%	70.7%	0.0%	27.5%
Del Rey Elementary	Del Rey	-0.5	-20.0	4.2%	0.4%	92.9%	2.4%	31.8%
Fairmont K-8	Fairmont	+23.5	+4.1	4.8%	0.2%	39.8%	0.7%	9.2%
John S. Wash Elementary	Sunnyside	+25.5	+16.8	4.2%	0.4%	53.1%	0.9%	13.6%
Lone Star Elementary	Lone Star	+15.2	-5.7	3.0%	0.6%	70.3%	1.5%	19.4%
Sequoia Elementary	Sunnyside/ Lone Star	+9.2	-9.1	3.8%	1.9%	59.2%	1.7%	16.7%
Quail Lake Environmental Charter School (K-8) – unincorporated	Clovis	+63.0	+53.3	3.0%	0.3%	19.8%	0.2%	4.4%
Biola-Pershing Elementary	Biola	-10.6	-22.5	9.0%	0.0%	96.5%	0.9%	51.3%
Sun Empire Elementary	Biola/Kerman	+5.8	+10.6	6.3%	0.3%	82.1%	0.3%	43.2%
Indianola Elementary	Selma SOI	-21.1	-44.5	11.1%	4.0%	80.3%	0.0%	31.8%
Terry Elementary	West of Selma	-13.4	-43.3	9.3%	2.5%	92.5%	0.5%	52.2%
Alta Elementary	Reedley/Orange Cove	-16.9	-11.6	7.5%	0.7%	92.3%	0.0%	59.0%
Great Western Elementary	Reedley/Cella	+4.3	+8.2	4.1%	1.1%	85.1%	0.6%	43.7%
Dunlap Elementary (K-8)	Dunlap	-8.6	-22.5	13.4%	2.1%	68.8%	0.5%	8.5%
Riverview Elementary (K-8)	Reedley SOI	+32.8	+17.0	2.0%	1.6%	61.2%	0.0%	14.9%
Silas Bartsch K-8	Reedley SOI	+10.3	-20.2	3.3%	2.3%	85.4%	0.0%	40.2%
Navelencia Middle	Navelencia	-15.4	-52.3	7.0%	7.4%	88.0%	0.3%	22.8%
Kings Canyon Continuation	Reedley SOI	-62.5	-170.7	-	12.0%	94.8%	0.0%	20.1%
Malaga Elementary	Malaga	-1.1	-22.4	9.2%	1.6%	84.6%	0.0%	27.7%
Alice M. Worsley School	Malaga/Fowler	-	-	24.3%	19.3%	100.0%	21.9%	16.1%
Hume Lake Charter School	Hume	+60.4	+4.6	6.5%	0.0%	43.5%	0.0%	1.4%
Pine Ridge School (K-12)	Auberry/Tollhouse	+18.6	-26.5	12.7%	0.0%	26.2%	1.9%	0.0%
Sierra Junior High School	Auberry/Tollhouse	+6.8	-44.3	13.5%	6.2%	39.6%	0.0%	0.5%
Laton High	Laton	-4.1	-110.5	-	7.7%	84.2%	0.0%	21.9%
Laton Middle	Laton	-42.3	-66.5	6.2%	10.1%	85.8%	0.0%	32.6%
Laton Elementary	Laton	-69.4	-74.0	3.0%	0.3%	87.5%	0.0%	52.7%

Table 1A-10: School Performance Scores in Unincorporated Fresno County

School Name	Community	ELA Score	Math Score	Chronic Absenteeism Rate	Suspension Rate	Socioeconomically Disadvantaged	Foster Youth	English Learners
Riverdale Elementary	Riverdale	-28.2	-53.4	7.1%	4.1%	83.0%	0.0%	37.6%
Fipps Primary	Riverdale	-2.4	+6.5	11.2%	0.2%	88.0%	0.2%	55.1%
Riverdale High	Riverdale	+9.0	-62.7	-	3.1%	84.3%	0.0%	22.3%
Burrel Elementary	Burrel	-59.3	-50.3	6.0%	1.5%	91.8%	0.0%	61.5%
Pacific Union Elementary	Bowles	-26.5	-45.4	13.9%	4.5%	88.2%	1.2%	58.4%
Raisin City Elementary (K-12)	Raisin City	-78.7	-108.7	0.0%	0.0%	96.5%	0.3%	71.0%
Westside Elementary (K-12)	Five Points	-53.1	-77.8	6.3%	1.0%	94.7%	1.1%	73.9%
Helm Elementary	Helm	-56.4	-56.1	17.6%	8.8%	100.%	0.0%	55.0%
Cantua Elementary	Cantua	-53.5	-70.0	7.0%	4.5%	94.4%	0.0%	78.3%
Tranquillity Elementary	Tranquillity	-109.4	-130.9	12.8%	4.9%	89.5%	0.0%	51.0%
Tranquillity High	Tranquillity	-36.5	-126.7	-	16.6%	96.6%	0.2%	34.5%
Navelencia Middle	Navelencia	-15.4	-52.3	7.0%	7.4%	88.0%	0.3%	22.8%

Table 1A-10: School Performance Scores in Unincorporated Fresno County

Source: California Department of Education, 2019

Environmental Health

The Office of Environmental Health Hazard Assessment (OEHHA) reports CalEnviroScreen 4.0 scores for the unincorporated county, suggesting relatively adverse environmental conditions in the western county compared to eastern (see Figure 1A-<u>192+</u>). According to OEHHA, the smaller tracts in the center of the county, primarily west of SR 99 but including the Reedley area, have scores above the 90th percentile. In contrast, east of Reedley and Clovis, scores are typically below the 50th percentile, dropping significantly in the Sierra National Forest. The stark differences in environmental conditions between eastern and western Fresno County is likely due to the dominance of commercial agricultural practices and natural resource extraction, both of which are known to have negative impacts on the surrounding areas resulting from air pollution and other contaminants. The higher CalEnviroScreen scores in western Fresno County are even more notable when compared to other indicators of fair housing issues, such as socioeconomic characteristics, as there are notably higher rates of poverty, lower median incomes, and higher proportions of non-White and non-English speaking persons in western Fresno County, as discussed throughout this assessment.

The primary indicators leading to the high environmental scores as reported by OEHHA's CalEnviroScreen vary across the county, but include ozone, particulate matter (PM) _{2.5}, diesel PM, pesticides, toxic releases, drinking water contaminants, chemical cleanup, lead in housing, groundwater threats, hazardous waste, impaired water, and solid waste. Ozone, diesel particulate, and PM_{2.5}, forms of pollution generated by car traffic and industrial uses, score higher in areas along the Interstate (I-) 5 corridor, with the lowest scores found in the sparsely populated southwest areas. In the unincorporated county, pesticide use, groundwater threats, and solid waste facilities are more prevalent than in urbanized areas, reflecting the presence of agricultural industries and chemical and waste storage outside of urban areas. Nearly all of western Fresno County is considered to be Senate Bill (SB) 535-qualifying disadvantaged communities, representing the census tract with scores that are higher than 75% of all other census tracts (aka upper quartile or the highest 25th percentile census tracts) in CalEnviroScreen 4.0, census tracts previously identified in the top 25th percentile in CalEnviroScreen 3.0, and census tracts with high amounts of pollution and low populations. This indicates that, as compared with statewide averages, the western part of the unincorporated county represents an area of potential concern regarding fair housing and disproportionate exposure to environmental hazards and a concentration of vulnerable populations.

The County added an Environmental Justice Element as part of its comprehensive General Plan update, which focuses on topics and geographical areas that parallel with environmental issues and disadvantage communities, including: housing with an emphasis on improving unsafe housing conditions, improving environmental conditions, and enhancing and prioritizing access to resources.

The first goal (EJ-A) and its policies focus on ensuring new developments do not disproportionately burden disadvantaged communities. The second goal (EJ-B) and its policies promote improved access to facilities and spaces for physical activity. The third goal (EJ-C) and its policies seek to improve access to health care and healthy foods in disadvantaged communities. The fourth goal (EJ-D) and its policies concentrate on creating safe and sanitary living conditions. This goal has the most direct relationship to the Housing Element. For example, Policy EJ-D.1 (Home Rehabilitation) and Program 23 of this Housing Element (Housing Preservation and Rehabilitation) both direct the County to administer the Housing Assistance Rehabilitation Program (HARP) and expand funding opportunities to finance home-based improvements for income qualified residents. Policy EJ-D.2 (Assisted Home Rehabilitation) directs the County to expand this type of support for more vulnerable populations, including residents with disabilities, senior residents, and lower-income residents. The fifth goal (EJ-E) and its policies ensure that residents can meaningfully engage in the planning and development process, particularly those residents in disadvantaged communities that experience health and environmental burdens.

Through the goals, policies, and implementation actions of the Environmental Justice Element, the County formalizes its long-term and ongoing commitment to affirmatively furthering fair housing by addressing the topics associated with environmental justice throughout the unincorporated county.

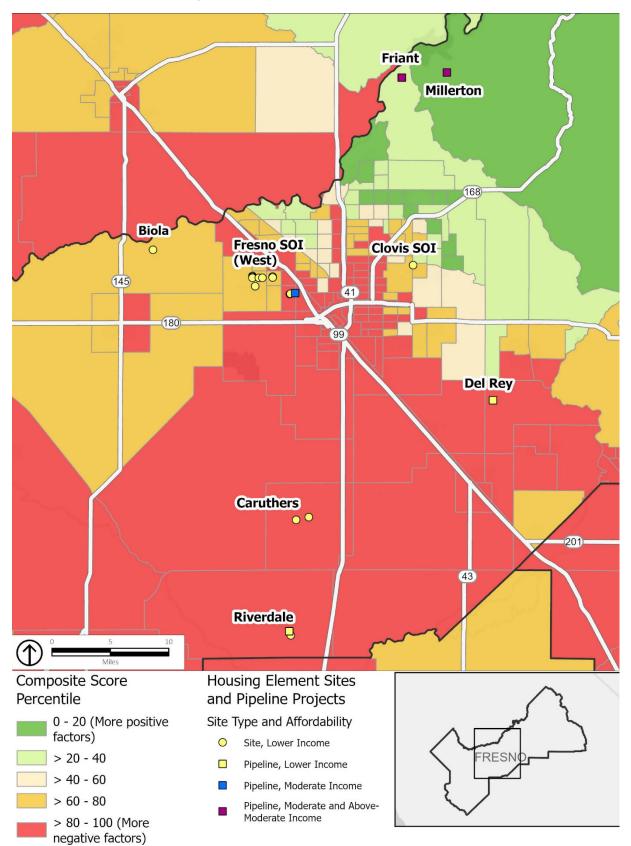


Figure 1A-1921: CalEnviroScreen Scores

Source: CalEnviroScreen 4.0; accessed July 2023

SECTION 1A-3: LOCAL ASSESSMENT OF FAIR HOUSING

Further, the Federal Emergency Management Agency (FEMA) develops flood maps that identify areas with the highest risk of flooding, differentiating them by the degree of severity and frequency of flooding anticipated. In Fresno County, flood zones are largely in western areas, with the only flood zones in eastern Fresno County being small areas around mountain lakes and rivers (see Figure 1A-202). Flood zones include Zone AO, AE, AH, and A, which indicate the depth of the 1.0% annual chance of flooding, and areas with a 0.2% annual chance of flooding. The Fresno Slough and San Joaquin River in western Fresno County pose the greatest threat of flooding, beyond the impacts of heavy rains at low elevations. As such, flood risk is greatest for lower-income communities in western Fresno County that experience greater burdens of pollution burden than communities in eastern Fresno County.

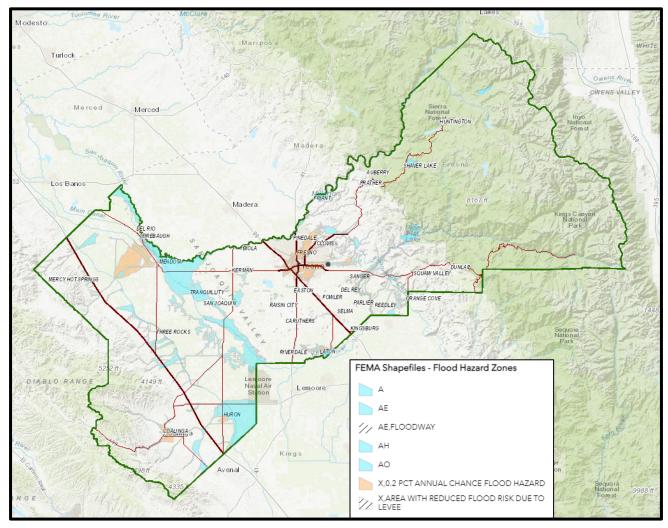


Figure 1A-202: Flood Hazard Zones

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

Disproportionate Housing Need and Displacement Risk

Overcrowding

Overall, approximately 6.2% of households in the unincorporated county are considered overcrowded, a similar proportion as the percentage of overcrowding in Fresno County as a whole (6.1%). In addition, approximately 2.3% of households in the unincorporated county report being severely overcrowded, compared to 3.6% of households in Fresno County. However, overcrowding is significantly higher among renters in the unincorporated county, of whom, 12% are overcrowded, than among homeowners, of whom, 3.6% are overcrowded.

As shown in Figure 1A-213, overcrowding is notably lower east of the cities of Clovis and Sanger, and higher in western Fresno County, particularly in the communities of Caruthers and Riverdale. This is reflected in Table 1A-11. These communities in eastern Fresno County tend to have had consistently lower rates of overcrowding since 2010, including Auberry, Shaver Lake, and Squaw Valley. Of those communities for which data is available, Caruthers, Del Rey, and Riverdale have seen significant increases in overcrowding, while Calwa, Laton, and Malaga have seen significant decreases.

	2	010	2020			
Select Communities*	Overcrowded	Severely Overcrowded	Overcrowded	Severely Overcrowded		
Auberry	1.8%	0.8%	0.0%	0.0%		
Calwa	17.0%	22.2%	9.0%	13.1%		
Caruthers	5.8%	0.0%	13.3%	1.0%		
Del Rey	4.0%	1.6%	14.6%	9.5%		
Easton	6.5%	0.5%	3.0%	1.2%		
Laton	14.5%	0.0%	4.5%	0.0%		
Malaga	20.4%	5.4%	9.3%	0.0%		
Riverdale	6.3%	1.3%	15.4%	5.3%		
Shaver Lake	0.0%	0.0%	1.0%	2.1%		
Squaw Valley	5.8%	1.8%	3.1%	0.0%		
Unincorporated Fresno County	6.4%	2.2%	6.2%	2.1%		

Table 1A-11: Percentage of Overcrowded Households in Unincorporated Communities

*Includes communities for which Census data was available in both 2010 and 2020. *Source: 2006-2010 ACS, 2016-2020 ACS*

According to the 2016-2020 ACS, the greatest increase in renter overcrowding was in Del Rey (17.7 percentage point increase) and Squaw Valley (14.1 percentage point increase). In Squaw Valley, renters account for just 13.5% of households; therefore, the high rate of renter overcrowding is not fully reflected in the total overcrowding rate, which is among the lowest in the unincorporated county. In Del Rey, the dramatic increase in overcrowded renter households is likely the cause of the significant increase between 2010 and 2020 for total household overcrowding as homeowner overcrowding remains at less than the

county percentage. In contrast to Del Rey and Squaw Valley, the largest decreases in renter overcrowding occurred in Laton (17.5 percentage point decrease) and Calwa (15.4 percentage point decrease). The largest increase in homeowner overcrowding occurred in Caruthers (11.6 percentage point increase) and Riverdale (8.6 percentage point increase). The largest decreases, in contrast, occurred in Laton (5.7 percentage point decrease) and Malaga (4.4 percentage point decrease). High rates of either renter or homeowner overcrowding, particularly significant increases, may indicate a shortage of housing overall, unmet demand for units with enough bedrooms for larger households, or increasing housing costs.

Overcrowding in Fresno County appears to be largely concentrated in a few communities, as indicated in Table 1A-11, indicating a need for concentrated solutions.

Overpayment

In the unincorporated county, 15.9% of households are cost burdened, and 13.2% are severely cost burdened, for a total of 29.1% of all households (Table 1A-12). Of these households, approximately 46.7% are renters, though renters comprise only 31.1% of households in the unincorporated county. In total, 21.5% of renters are cost burdened and 13.3% are severely cost burdened, compared to 20.5% and 9.7% of homeowners, respectively.

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. As such, these households are most at risk of displacement due to overpayment resulting from more limited flexibility in responding to changes in income or rent. In the unincorporated county, 24.4% of all lower-income households are cost burdened and 32.3% are severely cost burden, for a total of 56.7% of all lower-income households experiencing some degree of cost burden (see Table 1A-12). Lower-income renters experience overpayment at a higher rate than lower-income homeowners, while both are similarly impacted by severe overpayment, indicating the degree of unaffordability in the unincorporated county. While moderate-income households experience overpayment at a similar rate as lower-income households, they are not as impacted by severe overpayment. Therefore, the housing prices in the unincorporated county may be attainable to some moderate-income households, above moderate-income households. In contrast to lower- and moderate-income households, above moderate-income households in the unincorporated county experience the lowest rate of overpayment. However, homeowners in this income category are the only ones that experience overpayment at a higher rate than renters in the same category.

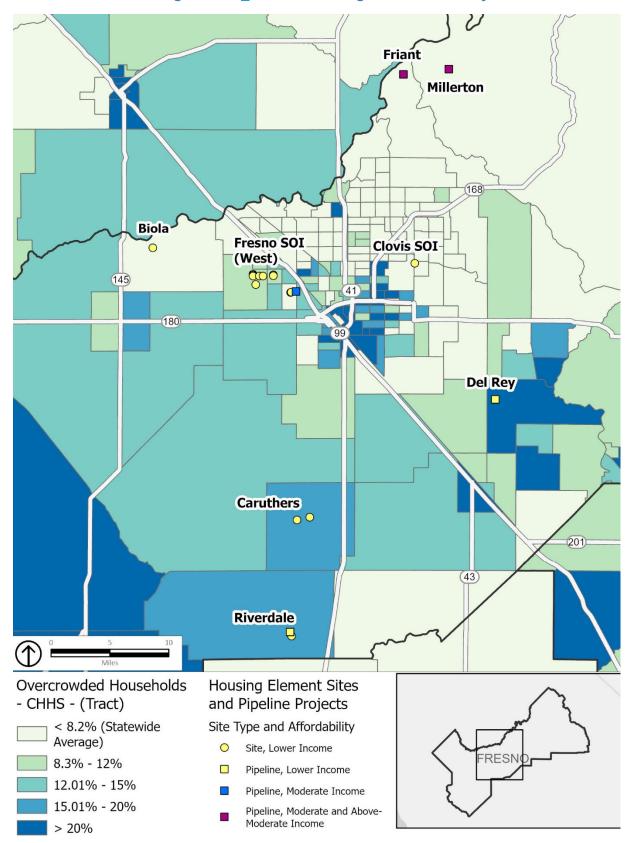


Figure 1A-213: Overcrowding in Fresno County

Source: CHHS, 2020; County of Fresno, 2023.

		Cost Buro	lened	Severely Cost Burdened			
Household Type	2010	2018	Percentage Change	2010	2018	Percentage Change	
All Households	18.0%	15.9%	2.1%	15.0%	13.2%	-1.8%	
Renters	18.3%	21.5%	-3.2%	18.9%	20.5%	1.6%	
Homeowners	17.9%	13.3%	4.6%	13.1%	9.7%	-3.5%	
Lower-Income Households	22.8%	24.4%	-1.7%	36.3%	32.3%	-4.0%	
Renters	23.3%	28.3%	-5.0%	32.2%	33.6%	1.4%	
Homeowners	22.2%	19.7%	2.4%	41.4%	30.9%	-10.6%	
Moderate-Income Households	22.3%	20.8%	1.5%	9.6%	7.4%	-2.2%	
Renters	24.9%	27.4%	-2.4%	1.5%	0.3%	-1.2%	
Homeowners	20.9%	16.9%	4.0%	15.6%	11.5%	-4.1%	
Above Moderate-Income Households	14.4%	9.9%	4.6%	2.9%	1.8%	-1.1%	
Renters	6.3%	6.3%	0.0%	0.0%	0.8%	0.8%	
Homeowners	16.2%	10.6%	5.5%	3.5%	2.1%	-1.4%	

Table 1A-12:	Cost Burden	in Unincorporated	Fresno County, 2010-2018
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Sources: CHAS 2006-2010 and 2014-2018

Since 2010, all income categories have experienced a decrease in severe overpayment overall (see Table 1A-12). However, lower-income and above moderate-income renters have experienced small increases. While overpayment among lower-income renters has decreased, the increase in severe overpayment may include some renters whose costs were more than 30% of their income in 2010, but have since increased beyond 50%, or may be new renters in the market. In contrast, both overpayment and severe overpayment have decreased among moderate-income renters. While overpayment has increased among most other groups, most changes have been relatively small compared to rates of rising overpayment within incorporated areas. This is representative of the higher housing costs typically found in incorporated cities, near employment opportunities, services, schools, and other resources and amenities.

As shown in Figures 1A-224 and Figure-1A-235, the highest rates of overpayment in Fresno County are primarily in the center of the county, surrounding the cities of Fresno, Clovis, Sanger, Parlier, and Selma. Most of the census tracts in which more than 40% of homeowners are overpaying and all of the tracts in which more than 60% of renters are overpaying overlap largely with incorporated areas. In these tracts, the unincorporated county consists primarily of low-density agricultural land. As such, it is difficult to determine whether the rate of overpayment is attributed to housing within incorporated cities, housing in the unincorporated county, or both. However, incorporated areas have the highest concentration of employment opportunities, as discussed in Section 3: Regional Assessment of Fair Housing; therefore, it can be assumed that housing costs within the spheres of influence of Fresno County cities likely reflects the prices within city limits, which likely results in similar levels of overpayment.

In the unincorporated county, rising home costs are not necessarily linked to rates of overpayment. For example, the median home value in Laton has increased by an average of 11.9% annually since 2014, but homeowner overpayment is among the lowest in the unincorporated county at 19.4% (see Table 1A-13). In

most communities for which median home value is available, approximately one-third of homeowners are overpaying for housing, regardless of the degree of change in home values. This is reflected in Figure 1A-235, which shows that overpayment in much of the unincorporated county is relatively consistent, with increases close to central cities such as Fresno, Sanger, Parlier, and Selma.

Select Unincorporated	Median H	lome Value	Average	Homeowner
Communities	2014 2022		Annual Change	Overpayment Rate
Auberry	\$282,183	\$460,939	7.9%	36.0%
Caruthers	\$165,592	\$322,752	11.9%	33.0%
Easton	\$153,374	\$304,414	12.3%	35.8%
Friant	\$363,867	\$622,664	8.9%	32.3%
Laton	\$166,571	\$325,751	11.9%	32.2%
Riverdale	\$151,315	\$297,165	12.0%	19.4%
Shaver Lake	\$461,038	\$715,984	6.9%	26.6%
Squaw Valley	\$201,108	\$377,798	11.0%	30.6%
Tranquillity	\$136,735	\$276,563	12.8%	17.4%

Table 1A-13 Change in Median Home Value in Unincorporated Communities, 2014-2022

Note: Median home values are not available for all unincorporated communities in Fresno County. *Source: Zillow.com, accessed October 2022*

In contrast to the relatively consistent rate of homeowner overpayment, renters living in communities adjacent to or near incorporated areas are disproportionately burdened by overpayment. This is seen in Calwa and Del Rey, where 59.3 and 67.1% of renters are overpaying, respectively (Table 1A-14). Residents of these communities, given their location, likely commute to adjacent cities of Fresno, Sanger, and Parlier for employment and services. Since 2014, renter overpayment in Calwa has decreased from 68.2%, which may be in part due to decreasing rents. In contrast, renter overpayment in Del Rey has increased from 42.8% in 2014, likely due to the rapidly increasing rent in this community. Many communities in the unincorporated county have seen a decrease in rents since 2015, in contrast to those found in all incorporated cities in Fresno County. The decrease in the unincorporated county may be due to a variety of factors, including decreased demand for housing or increased supply. However, overpayment rates among renters remain high.

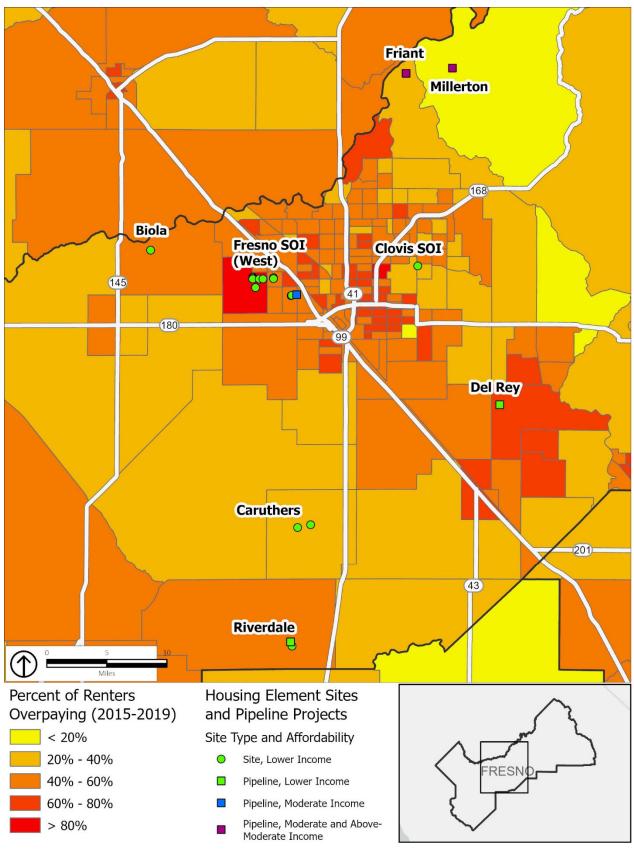
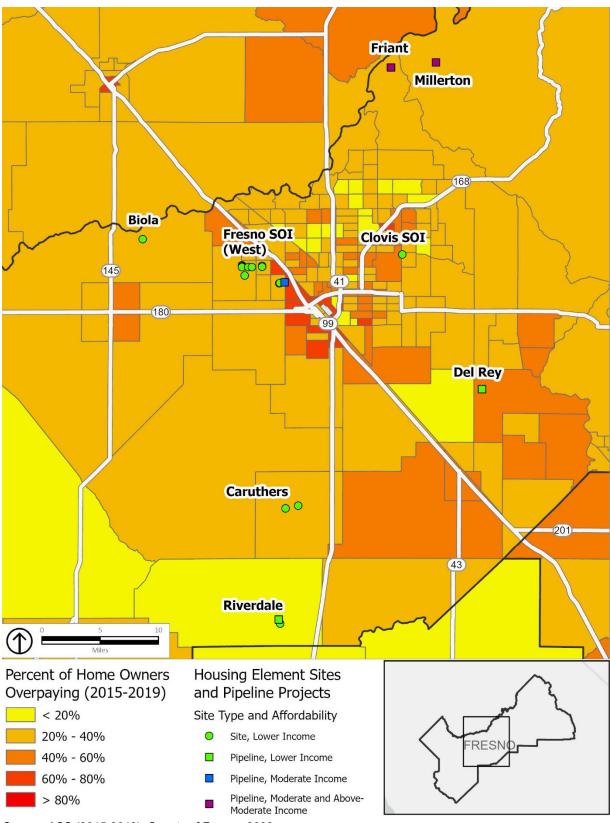


Figure 1A-224: Percentage of Renters Overpaying

Source: ACS (2015-2019); County of Fresno, 2023.





Source: ACS (2015-2019); County of Fresno, 2023.

Select Unincorporated	Median G	Fross Rent	Average Annual	Renter
Communities	2015 2020		Change	Overpayment Rate
Biola	\$714	\$1,044	9.2%	42.7%
Calwa	\$1,036	\$842	-3.7%	59.3%
Cantua Creek	\$817	\$576	-5.9%	42.3%
Caruthers	\$859	\$1,050	4.4%	36.5%
Del Rey	\$465	\$719	10.9%	67.1%
Easton	\$944	\$1,174	4.9%	38.9%
Laton	\$656	\$950	9.0%	32.5%
Raisin City	\$775	\$844	1.8%	30.2%
Riverdale	\$966	\$907	-1.2%	47.0%
Squaw Valley	\$963	\$1,000	0.8%	20.2%
Tranquillity	\$1,146	\$799	-6.1%	42.3%

Table 1A-14: Change in Median Gross Rent in Unincorporated Communities, 2015-2020

Source: 2011-2015 ACS, 2016-2020 ACS

Note: Median gross rents are not available for all unincorporated communities in Fresno County.

Substandard Housing Conditions

Approximately 78.8% of housing units in the unincorporated county are over 30 years old, and 47.4% are over 50 years old, suggesting that the unincorporated county's housing stock is relatively old. As reported in the Census, while the percentage of older units varies at the community level, on average, the housing stock is only slightly older in the western unincorporated county (with SR 99 as the divider between east and west). Communities such as Old Fig Garden, Sunnyside, and Tarpey Village, which are unincorporated islands within the City of Fresno, have the oldest housing stocks. Additionally, all 115 units in Fort Washington were built in the 1970s. 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.

Another measure of substandard housing conditions is the presence of kitchen and plumbing facilities. The 2015–2019 ACS estimated that there are no owner- or renter-occupied units in the western unincorporated county that lack a complete kitchen or plumbing, while in the eastern unincorporated county, there were 75 owner-occupied and 43 renter-occupied units that met these criteria. Of these, it is estimated that 80 units are occupied by extremely low-income households, 10 by very low-income households, 14 by low-income households, 29 by households earning 80 to 100% of the area median income, and 15 by households earning more than 100% of the area median income. In total, these units account for 1.1% of the housing stock in the eastern unincorporated county, 1.0% of owner-occupied units, and 1.3% of renter-occupied units. As this data may be limited, it cannot be assumed that there are no substandard units in the western unincorporated county. However, this does support that lower-income households, particularly lower-income renters, in the eastern unincorporated county are likely disproportionately burdened by housing conditions.

To supplement Census data, the County conducted a windshield survey in early 2023 and evaluated 4,599 homes (see Table 1A-15). Of the nearly 4,600 homes surveyed, 3,851 were located in one of 18 named unincorporated communities and 748 were located across other parts of the county. Table 1A-6 presents the results of this survey. While this survey represents roughly eight% of all homes in the unincorporated county, the County was able to survey around one-third of the total number of homes in the 18 named communities, with most surveys documenting the housing conditions of at least half of all existing homes.

The County applied the survey form and methodology as recommended by HCD on its "Building Blocks" webpage regarding the documentation and evaluation of housing stock characteristics. This survey is intended to gather information on the housing construction and structure type, presence of frontage improvements, and status of the foundation, roofing, siding, windows, and electrical systems, with values assigned to represent the level of repair needed. The values are then added up and assigned to one of the following structural condition categories: sound, minor, moderate, substantial, and dilapidated.

Of the homes surveyed, 79% are considered sound and another 10% of homes surveyed indicated a need for minor repairs, indicating that roughly 90% of all homes and households need little or no assistance to maintain safe and sanitary living conditions. Of the remaining homes surveyed, 7% may need moderate levels of assistance, 3% may need substantial rehabilitation assistance and 0.4% may need full replacement.

These results are not representative of every community. In some communities, 99% of homes are considered sound, while in others as few as 42% of homes are considered sound. Communities that demonstrate the greatest need include Calwa, Cantua Creek, Lanare, Laton, Mayfair, and Squaw Valley. Windows and siding were most often cited as specific elements in need of repair.

Taking into account the ratio of homes surveyed to total homes in each community, the County then applied the results of the survey to the entire unincorporated county (61,077 units) to estimate the number of total units in need of assistance. Out of the roughly 61,000 units across the entire unincorporated county, low estimates total roughly 2,800 units, with 1,400 in need of minor assistance, 900 in need of moderate rehabilitation, 500 in need of substantial rehabilitation, and 100 in need of major rehabilitation or demolition. Out of the roughly 61,000 units across the entire unincorporated county, higher estimates total roughly 4,500 units, with about 2,100 in need of minor assistance, 1,500 in need of moderate rehabilitation, 700 in need of substantial rehabilitation, and 200 in need of major rehabilitation.

Community Features in New			Range in C ehabilitatio			Total Numbe	% Survey by Level of Rehab Needed					
Surveyed	of Repair or Replacement	Minor	Mod.	Sub.	Dil.	Entire Community	Surveyed	Sound	Minor	Mod.	Sub.	Dil.
Biola	Little to none	1 to 2	-	-	-	327	156	99%	1%	-	-	-
Calwa	Windows	200 to 300	30 to 60	15 to 35	-	561	43	42%	42%	12%	5%	-
Cantua Creek	Windows, Siding	25 to 30	25 to 30	6 to 10	-	129	102	52%	21%	22%	6%	-
Caruthers	Siding	50 to 75	50 to 75	5 to 7	-	613	213	83%	8%	8%	1%	-
Del Rey	Roofing	45 to 60	15 to 30	5 to 20	-	418	205	82%	11%	5%	1%	-
Easton	Little to none	10 to 25	-	-	-	620	334	98%	2%	-	-	-
Fig Garden	Little to none	5 to 100	5 to 100	-	-	2,178	198	99%	1%	1%	-	-
Friant	Siding	1 to 7	5 to 10	-	-	238	190	95%	2%	4%	-	-
Lanare	Windows, Siding, Roofing	15 to 25	5 to 15	20 to 30	5 to 15	169	121	68%	10%	7%	13%	2%
Laton	Windows, Siding	85 to 100	125 to 140	30 to 45	10 to 25	523	306	47%	18%	26%	7%	2%
Malaga	Windows	1 to 7	15 to 25	10 to 20	1 to 7	295	212	87%	1%	7%	4%	0.5%
Mayfair	Windows	430 to 455	165 to 180	-	-	1,829	673	66%	24%	10%	-	-
Raisin City	Windows, Roofing	1 to 15	5 to 20	1 to 15	2 to 10	92	51	78%	6%	10%	4%	2%
Riverdale	Siding	45 to 60	55 to 70	15 to 30	5 to 15	798	523	83%	6%	8%	2%	0.6%
Squaw Valley	Windows, Siding, Roofing	30 to 130	30 to 130	240 to 340	70 to 150	1,449	81	69%	4%	4%	19%	5%
Tarpey Village	Siding, Roofing	110 to 210	20 to 120	-	-	1,542	116	88%	9%	3%	-	-
Tranquillity	Siding	20 to 25	10 to 15	5 to 10	-	218	192	84%	9%	4%	3%	-
West Park	Roofing	25 to 40	15 to 30	-	-	282	135	81%	12%	7%	-	-

Table 1A-15: Windshield Survey of Housing Conditions, Unincorporated County, 2023

	Table 1A-15: Windshield Survey of Housing Conditions, Unincorporated County, 2023											
Community Surveyed Surveyed Most Common Features in Need of Repair or Replacement			Range in Co ehabilitatio	-		Total Numbe	er of Homes	% Su	rvey by L	evel of R	ehab Ne	eeded
	Minor	Mod.	Sub.	Dil.	Entire Community	Surveyed	Sound	Minor	Mod.	Sub.	Dil.	
Other Uninc.	Windows	300 to 400	300 to 400	100 to 175	5 to 50	48,796	748	80%	8%	8%	3%	0.01%
Total		1,399 to 2,066	875 to 1,465	452 to 737	97 to 206	61,077	4,599	79%	10%	7%	3%	0.4%

Table 1A-15: Windshield Survey of Housing Conditions, Unincorporated County, 2023

Source: County of Fresno, 2023

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 remainder of the county.

Throughout the FMCoC area, which includes Madera County, approximately 60.0% of the homeless population identified as male, 29.0% as female, and 1.0% as transgender. Approximately half of the population identified as Hispanic, 6.0% identified as Native American or Alaska Native, 3.7% as Asian, 15.6% as Black or African American, 0.8% as Native Hawaiian or Pacific Islander, 60.6% as White, and 12.8% as multi-racial or belonging to another race. Additionally, 205 people, or 4.9% of the homeless population, were veterans, 15.0% were survivors of domestic violence, and 19.0% had a serious mental illness. While the age of homeless persons was reported generally, it did not identify the senior population. 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 those individuals in the remainder of the county.

Table 1A-16 identifies the proportion homeless community members identified in the FMCoC area as part of the 2020 PIT by race and ethnic group compared to the unincorporated Fresno County's population and the population in the combined Fresno and Madera County area based on data from the 2016-2020 ACS to identify whether any of these protected classes are disproportionately represented as part of the homeless population. The demographics of the unincorporated Fresno County area and the combined Fresno and Madera County area are relatively similar. Compared to both the unincorporated Fresno County and the two-county areas, the homeless population surveyed indicated potential over-representation of people who identified as Black or African American, American Indian or Alaska Native, or Two or More Races. People who identified as Native Hawaiian or other Pacific Islander are potentially somewhat over-represented. When compared only to the unincorporated Fresno County area, Hispanic community members are potentially somewhat over-represented in the homeless population. It is worth noting that, given the small size of the homeless population in the unincorporated county, it is unlikely that all protected characteristics are represented. Additionally, because data on homelessness is collected across both counties combined, it is difficult to determine whether any overrepresentation is localized to unincorporated Fresno County (as a whole and any individual unincorporated community).

The County Administrative Office provides a web-based reporting option for Fresno County residents to report homeless encampments, with the input creating a case so that all the necessary County departments can get involved to provide assistance and address public health and safety issues as needed. The County evaluates the reporting data both individually and in aggregate to understand where focus and additional assistance is needed, including patterns of new encampments repeat locations. The County also, as resources are available and warranted, confirms the reports—both to validate the information and to avoid

overcounting or undercounting due to erroneous or duplicate reporting (e.g., five reports associated with one person compared to five individuals).

While the online reporting tool is intended only for unincorporated locations, the County coordinates with other jurisdictions to address encampments reported in incorporated areas. Based on this information (as of April 2024), and additional discussions with various County departments, the majority of homeless encampments are located and/or have been reported in incorporated locations, especially in and around the City of Fresno. The west side of the Fresno metro area has the most reports of homeless encampments, with some encampments confirmed to be on unincorporated lands. Significant homeless encampments have also been reported in central, south central, and the southeast portions of the Fresno metro area.

County communities that have reported homeless encampments but are not major hubs for homeless encampments include Lanare, Caruthers, and Laton. Other encampments have been reported in rural areas located away from cities and communities such as the unincorporated regions in the foothills and mountainous areas as well as the rural west side of the County.

While resources are generally more available within and near incorporated cities, rural areas typically have limited resources to meet the needs of the unhoused, particularly transportation and available shelter beds. Street outreach services are provided throughout the County, in both rural and urban areas and help to bridge the gap in rural services by providing transportation and connection to other services.

The County of Fresno Homeless Encampment Response Workgroup consists of County Administrative Office, Sheriff's Office, County Counsel, Environmental Health, and Public Works and Planning. This workgroup is tasked with addressing homeless encampments reported throughout the County. The workgroup also coordinates with local street outreach service providers in responding to homeless encampments. Prior to addressing a homeless encampment, street outreach teams engage with unhoused individuals to offer services and provide linkages to community resources. Additionally, the Behavioral Health, Social Services, and Internal Services Departments provide support for the workgroup infrastructure and homeless response activities.

Homelessness is often a cross-jurisdictional issue; therefore, the County participates in, and offers, several homelessness resources and programs that are available regionally, identified in Table 1A-17.

		incorporated County	Populatio	n in FMCoC	Homeless Pe	Population Over-	
Racial or Ethnic Group	Number	Percent	Number	Percent	Number	Percent	Representation
Race	1	1	T	1	-1	-1	F
White, Not Hispanic/Latino	66,204	39.6%	336,278	29.3%			
White, Hispanic/Latino	46,243	27.7%	355,939	31.1%	2,146	58.9%	No
Black or African American, not Hispanic/Latino	3271	2.0%	48,428	4.2%			
Black or African American, Hispanic/Latino	393	0.2%	2,673	0.2%	669	18.4%	Substantial
American Indian or Alaska Native, not Hispanic/Latino	1,038	0.6%	5,905	0.5%			
American Indian or Alaska Native, Hispanic/Latino	921	0.6%	8,202	0.7%	347	9.5%	Substantial
Asian, not Hispanic/Latino	12,557	7.5%	106,152	9.3%			
Asian, Hispanic/Latino	224	0.1%	2,512	0.2%	64	1.8%	No
Native Hawaiian or Other Pacific Islander, not Hispanic/Latino	149	0.1%	1,432	0.1%			
Native Hawaiian or Other Pacific Islander, Hispanic/Latino	10	<0.1%	245	0.0%	37	1.0%	Minor
Some Other Race Alone, not Hispanic/Latino	381	0.2%	2,299	0.2%			
Some Other Race Alone, Hispanic/Latino	23,140	13.9%	179,854	15.7%	N/A	N/A	N/A
Two or More Races, not Hispanic/Latino	3,759	2.3%	26,384	2.3%			
Two or More Races, Hispanic/Latino	8,772	5.3%	69,826	6.1%	378	10.4%	Substantial
Ethnicity	T		T	T		1	
Not Hispanic/Latino, of Any Race	87,359	52.3%	526,878	46.0%	1,743	47.9%	No
Hispanic/Latino, of Any Race	79,703	47.7%	619,251	54.0%	1,898	52.1%	Minor (uninc. Fresno County)
Total Population	167,062	100.0%	1,146,129	100.0%	3,641	100%	-

Table 1A-16: Demographic Characteristics of the Homeless Population in the Fresno Madera Continuum of Care, 2020

Abbreviations: Pop. - Population; FMCoC - Fresno Madera Continuum of Care; uninc. - unincorporated

Source: U.S. Census Bureau, ACS 2016-20 (5-year Estimates), Table B03002; HUD, CoC Homeless Populations and Subpopulations Reports (2020).

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	all residents of Fresno County(operation)esno County chavioral Health ARM LineAvailable during weekday business hours for non-emergency emotional and coping support for residents throughout the countyFresno Count Department of Behavioral Hulti-Agency esponse to ommunity community omelessness (ARCH)Countywide collaboration to address homelessness through coordination of resources regionally and cross- jurisdictionally, engagement of the community-specific programs, and inclusion of rural representatives selected by FCOGFCOG/Juriscurning Point of entral CaliforniaMental health services including a full- service partnership programContracted b County Depa of BehavioraTemporary housing, permanent housing, or arrears payments for families eligible or arrears payments for families eligible or arrears payments for families eligibleFresno Count Person Count					
Multi-Agency Response to Community Homelessness (MARCH)	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	FCOG/Jurisdictions	Countywide			
Turning Point of Central California		Contracted by Fresno County Department of Behavioral Health	Countywide			
Fresno County Department of Social Services Homeless Assistance		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			
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			

Table 1A-17: Services to Address Homelessness

Service/Resource	Description	Operator	Location				
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				
Farmworker Community Partnership	Provides food boxes to farmworker communities.	Central California Food Bank/California Farmworker Foundation/United Farm Workers	Del Rey and Orange Cove				
Fresno County Food Map	o County Food Online service mapping locations of feeding sites, food banks, etc.		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				

Table 1A-17: Services to Address Homelessness

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

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 often substandard housing conditions. Although Fresno County's 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 began shifting toward recruiting and employing H-2A Temporary Agricultural Workers, many of whom

are from Mexico and Central America. However, farmworkers are essential to Fresno County's economies as well as to local and national food supplies, and their need to have safe and affordable housing resources must be addressed.

The 2017 Census of Agriculture identifies 3,030 farm operations within zip codes that are entirely in the unincorporated county, accounting for 53.2% of farm operations in the county. However, this excludes portions of the unincorporated county in zip codes of incorporated jurisdictions, many of which include farm operations within two to five miles of incorporated city limits. These census tracts may include farm operations that employ workers and provide on-site facilities that the HCD Employee Housing Facilities Permit Services database reports as linked with an incorporated city, even though they may be just outside the city boundaries. While the farm operations identified in Table 1A-18 are outside of incorporated areas' zip codes, proximity to cities may provide farmworkers with housing opportunities and access to services and resources, though residential opportunities may be more affordable in some parts of the unincorporated county.

Zip Code	Community / Area	Farm Operations
93616	Del Rey	48
93618	Dinuba	207
93621	Dunlap	10
93624	Five Points	30
93656	Five Points/Riverdale	101
93627	Helm	8
93605	Big Creek/Camp Sierra	1
93608	Cantua Creek	6
93651	Prather	51
93602	Prather/Shaver Lake	28
93667	Southeast of Prather	36
93611	East of Clovis	52
93619	Northeast of Clovis	254
93626	Friant	31
93730	Southwest of Friant	37
93675	West of Dunlap	54
93641	Southeast of Dunlap	4
93737	East of Fresno City	49
93725	Southeast of Fresno City	300
93706	Southwest of Fresno City	425
93745	North of Bowles	10

Table 1A-18: Farm Operations by Zip Code, Unincorporated Fresno County

Zip Code	Community / Area	Farm Operations
93652	Raisin City	13
93609	Caruthers	142
93242	Laton	91
93245	Lemoore	273
93606	Biola	11
93723	Biola	201
93620	North of Firebaugh	136
93665	Northwest of Firebaugh	2
93668	Tranquillity	34
93649	Piedra	4
93631	Southeast of Selma	330
93648	Northwest of Reedley	51
Total		3,030

Table 1A-18: Farm Operations by Zip Code, Unincorporated Fresno County

Source: USDA Census Farm Operations, 2017

According to the 2016-2020 ACS, 13.6% of the labor force in the unincorporated county is employed in agriculture, forestry, fishing and hunting, and mining. While it is likely that not all these workers are engaged in farm labor, the data allow comparisons between jurisdictions and the unincorporated county and 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% of the county farmworker employment, 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 these data likely underrepresent the actual farmworker population, because undocumented residents do not often participate in traditional data collection.

The Phase 1 COVID Farmworker Survey Report completed by the California Institute for Rural Studies (CIRS), published in February 2021, estimates that undocumented workers comprise approximately 50% of workers statewide. They are predominantly Mexican, and the majority are Mixteco and Triqui indigenous non-Spanish-speaking people. According to the article "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. Approximately 64.7% (154 persons) of the respondents to the Farmworker Survey reported residing in unincorporated communities. Of these, 24.7% resided in Del Rey, 15.6% in Cantua Creek, 9.1% in Biola, 9.1% in Caruthers, 8.4% in Lanare, 8.4% in Laton, 7.1% in Tranquillity, 5.2% in Riverdale, 5.2% in Raisin City, 1.7% in Easton, and a combined 5.2% in Three Rocks, Five Points, El Progresso, and Tombstone. Less than 1.0% of the respondents (0.3%) reported their place of residence as outside of the county. Similar proportions of respondents from unincorporated communities disclosed their status as a citizen (35.7%) or permanent resident (36.6%), and 18.2% reported being undocumented. The remaining 5.8% declined to respond. Only one respondent reported being an H-2A visa worker. According to the countywide survey effort, 37.0% of the respondents reported being citizens, 38.2% reported being permanent residents, 16.0% identified their status as undocumented workers, 6.3% did not respond, and 1.3% had H-2A visa status. It is likely that this representation of undocumented workers throughout the Fresno County region may be applicable to the farmworker population in the unincorporated communities.

According to the EDD, the most recent data (May 2022) for Fresno County measured the average wage for all farming occupations (Standard Occupational Classification (SOC) 45-0000, which excludes managers) at \$15.84 per hour, or approximately \$32,936 per year for full-time work. Average wages for graders and sorters of agricultural products (SOC 45-2014) and farmworkers and laborers for crops, nurseries, and greenhouses (SOC 45-2092) were roughly the same at between \$15.00 and \$15.30 per hour or between \$31,200 and \$31,822 for full-time work, respectively. According to the EDD data, the farmworker/laborer occupation (SOC 45-2092) represented by far the largest employment category. Average wages for agricultural equipment operators (SOC 45-2091) and farmworkers that work with animals (SOC 45-2093) were slightly higher at between \$16.95 and \$17.92 per hour or between \$35,268 and \$37,270 for full-time work, respectively.

Farm equipment mechanics and service technicians (SOC 49-3041) earned higher average wages of \$23.58 per hour or \$49,039 for full-time work. First-line supervisors of farmworkers (SOC 45-1011) earned an average of \$24.88 per hour or \$51,757 for full-time work The wages for all farming occupations are considered very low-income, and even the higher wages for farm equipment mechanics and technicians are considered low-income. However, as agricultural businesses may not employ workers year-round, seasonal workers could have lower annual incomes. The state minimum wage has been increased annually starting from \$10 per hour in 2017, rising to \$13 or \$14 per hour in 2021 (depending on number of employees), and reaching \$15.50 per hour in 2023 (regardless of the number of employees).

For 2021, the federal poverty threshold was \$26,500 and the California Medi-Cal poverty threshold was \$36,570 for a family of four. The median income in the unincorporated county is \$62,571, and 12.2% of the population lives below the poverty threshold. In the unincorporated county, 44.7% of households are Hispanic, and 61.3% of the total households in poverty are Hispanic households. The findings from the Fresno County Farmworker Survey indicate that 99.6% of farmworkers surveyed countywide are Hispanic. When the ACS 2016-2020 data that 13.6% of the labor force in the unincorporated county is employed in

agriculture are combined with the above poverty and EDD wage data, it suggests that a majority of the labor force employed in agricultural industries is Hispanic (see Table 2-10, Employment by Industry), and it is likely that many of these workers have incomes below the poverty threshold, even with past increases in state minimum wage.

The HCD Employee Housing Facilities Permit Services database identified 205 units of dedicated farmworker housing in Cantua Creek, Caruthers, Five Points, Helm, Tranquillity, Riverdale, and Laton with capacity for 303 workers (see Table 1A-19). In addition, there are 175 units with capacity for 549 H2-A workers in the unincorporated county.

Facility Name	Location	Units	Maximum Occupancy	
Farmworker Housing Facilities				
Cantua Creek Housing	Highway 33 and Derrick Avenue - Cantua Creek	29	29	
Marks Cattle & Grain Company	18150 S. Derrick Avenue – Cantua Creek	28	28	
Cantua Creek Vineyards IV	15970 San Mateo Avenue – Cantua Creek	13	13	
Buford's Housing	24927 W. Mt. Whitney Avenue – Five Points	29	29	
Colusa Ave. Housing Community	21770 S. Colusa Avenue – Five Points	12	12	
Westside Housing & Economic Network	23018 Lake Avenue - Five Points	25	25	
Terra Linda Farms	29000 S. Lassen Avenue – Five Points	13	13	
Five Points Housing Community	20860 S. Lassen Avenue – Five Points	10	20	
Farming "D"	24941 S. Lassen Avenue – Five Points	4	4	
Lion Ranches Employee Labor Camp	3744 W. Kamm Avenue - Caruthers	1	36	
Campos Brothers Labor Camp	16489 S. Cornelia Avenue - Caruthers	6	36	
Maddox Farms – Del Norte	14251 S. Del Norte Avenue - Helm	6	12	
Terranova Ranch, Inc.	16729 W. Floral Avenue – Helm	1	10	
Terra Linda Farms	3259 South James Road - Tranquillity	4	8	
Linda Vista Farms	12955 W. Mt. Whitney Avenue - Riverdale	20	20	
Parichan Farms	3486 E. Blanchard Avenue - Laton	4	8	
Subtotal		205	303	
H-2A Visa Housing Facilities		_		
West Housing	14610 S. West Avenue - Caruthers	1	8	
JP Honey Farms	5576 23rd Avenue - Riverdale	2	8	
Best Western Apricot Inn	46290 W. Panoche Road – West of Mendota	19	38	
Peri & Sons Farms	48845 W. Nees Avenue – West of Firebaugh	48	96	
San Diego Home	7421 S. San Diego Avenue – South of Mendota	1	5	
Manning Housing	17352 Manning Avenue – West of Reedley	1	5	
Chestnut Housing	ng 9929 S. Chestnut Avenue – Northwest of Selma			
East Housing	12877 S. East Avenue – West of Selma	1	8	

Table 1A-19: Farmworker Housing in Unincorporated Fresno County

Facility Name	Location	Units	Maximum Occupancy	
Selma Camp	4282 E. Conejo Avenue – West of Kingsburg	6	100	
Motel 6 – California Harvesters	35	105		
Motel 6 – Rancho Neuvo	56	168		
Subtotal		175	549	
Total		380	852	

Table 1A-19: Farmworker Housing in Unincorporated Fresno County

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

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

Given the number of workers in the unincorporated county employed in agriculture or related industries, capacity for 291 farmworkers, even with 188 units available for H-2A visa workers is likely insufficient to meet existing need for farmworker housing. Therefore, 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 224 USDA units and 84 units of Fresno County Housing Authority single-family units and multifamily affordable housing opportunities throughout the county, although they must compete with other lower-income households for the limited number of units. For undocumented workers, options are more limited, and a large portion of farmworkers may live in spaces not intended for human habitation, such as shacks, outbuildings and sheds, and converted garages, often in severely overcrowded conditions. Further, much of the housing for H-2A workers has been reserved in apartments and motels within or just outside incorporated cities. Therefore, while housing is available for this group of farmworkers which provides them greater access to resources, their housing opportunities may require longer commutes to farms in the unincorporated county.

Farmworker households that are permanent residents and citizens are among those included in ACS estimates, and therefore part of CHAS housing need estimates. Consequently, the housing needs of lowerincome farmworker households are not differentiated from other lower-income households experiencing overpayment, overcrowding, and substandard housing. Approximately 13.6% of the labor force in unincorporated county are reported to be employed in agricultural operations and similar fields, so farmworkers may comprise a portion of extremely low- and very low-income households experiencing one or more of these problems in the county. Based on the Fresno County Farmworker Survey, 81.7% of respondents from throughout the county reported incomes below \$2,500 per month, which generally corresponds to an extremely low-income household of four. In the unincorporated county, the rate of respondents that earned an income below \$2,500 per month ranged from 50% of respondents in Cantua Creek to 100% of respondents in Caruthers. It is likely that farmworkers earn similar wages countywide, and those local to unincorporated communities would have similar challenges securing affordable housing.

As stated previously, respondents to the Farmworker Survey that reported living in the unincorporated county identified living in Biola, Cantua Creek, Caruthers, Del Rey, Lanare, Laton, Raisin City, Riverdale, and Tranquillity. There were no respondents who reported living in communities northeast of Fresno and

Clovis and in the vicinity of the Kings Canyon National Park. These communities contain primarily older single-family homes with scattered deed-restricted units, USDA rural housing multi-family complexes, and a few Fresno County Housing Authority single-family and affordable multi-family housing complexes. According to Table 2-24, Fresno County Ability to Pay (2022), in the HNA, the median income in these unincorporated communities and unincorporated areas outside of the heavily agriculturally based cities generally falls within the extremely low- to very low-income ranges.

Although homeowners are the most common tenure type (68.9%) throughout the unincorporated county, higher than both the county and state, extremely low-income households comprise approximately 8.9% of total of total households in the unincorporated county (see Table 2-14 of the HNA) and are overwhelmingly renters (62.6%). Poverty rates in unincorporated areas around Firebaugh, Huron, and Mendota range between 27.7 to 53.6 percent; combined with high rates of renter households and Hispanic residents, this may suggest a concentration of farmworker households, reflecting the predominantly agricultural economy in those jurisdictions. The poverty rate in the central unincorporated county (e.g., Tranquillity, Helm, Cantua Creek, Five Points, Biola, Raisin City, Caruthers, Riverdale, and Laton) ranges from 20% to 30%, and these communities tend to have lower proportions of Hispanic residents.

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 specified 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 mixedstatus 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 HCV program, and therefore would not qualify to live in the USDA-assisted affordable multifamily housing complexes (i.e., Villa Del Rey Apartments, Brown Dairy, and Fresno Portfolio 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 assistance-ineligible population 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 the unincorporated county are single-family detached and attached units, which comprise 85.9% of the housing stock. Though 72.7% of assisted affordable units in the county are USDA units, the restrictions on head-of-household eligibility may limit affordable housing opportunities for some farmworkers. However, mobile homes comprise a significant proportion of the housing stock (9.4%), and they are naturally more affordable than single-family residential units. They may serve as a valuable housing resource for workers unable to qualify for market rate or affordable rental housing, or other accommodations.

The high proportion of single-family units supports findings of the Farmworker Survey, where respondents countywide indicated their preference for single-family units regardless of owner or renter status. Of the farmworkers surveyed who live in the unincorporated county, 42.0% are homeowners, compared to 68.9% of the total population in the unincorporated county, and 58.0% are renters, compared to 31.1% of the total population in the unincorporated county. The farmworker tenure patterns reflect the distribution among Hispanic households, of whom 52.1% are homeowners and 47.9% renters. All of the renters responded that they desired to be homeowners but could not attain that goal, even in the slightly less costly western and central valley unincorporated communities. The lower proportion of owner-occupied housing units among farmworkers suggests that the cost of homeownership, with the median price for two- and three-bedroom homes in the western and central unincorporated communities ranging from the mid-\$200,000 to mid-\$300,000s in January 2023, is above the current ability to pay for the majority of households with incomes below \$2,500 per month, including farmworkers.

While the average household size in the unincorporated county (3.0) is comparable to the county overall (3.1), the unincorporated county has slightly higher rates of small family households (2 and 3 person), and lower rates of nonfamily households. Approximately 18.4% of the households in the unincorporated county have more than five persons, with larger families more prevalent among homeowners (3.6 persons). However, the Farmworker Survey found that the average household size among farmworkers was 3.9 persons, and the average household size in the communities of Caruthers, Laton, Cantua Creek, Del Rey, Biola, Riverdale, and the area between Firebaugh and Mendota ranges from 3.8 to 5.0 persons, averaging 4.5 persons per household, which may reflect a higher proportion of farmworker households, lower median incomes, and other socioeconomic factors that influence household size.

The rate of overcrowding varies countywide, with higher rates in the west—generally exceeding 25% with the exception of the area around Coalinga (16.3%)—east of SR-99 between Sanger and Parlier, and around Orange Cove. The central communities west of SR-99 have similar rates as Coalinga, and the eastern areas are below the state average. This indicates that some large families may be unable to find affordable housing to accommodate their size or multiple households might have to share a single unit. Survey results indicated that 58.4% of the farmworkers in the county were living in overcrowded conditions, with renters facing additional challenges finding larger units. Although a limited number of three- and four-bedroom units are available in the affordable rental complexes, much of the older housing stock in western and central unincorporated communities are two- and three-bedrooms. Therefore, it is likely that farmworker households and other large households, particularly renters, may face challenges finding adequately sized

units within their ability to pay in the unincorporated county, 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 County includes Program 35 to reach out to local farm employers to identify housing needs, seek funding to support development of farmworker housing, and provide materials on available resources and financial assistance on the County website.

Displacement Risk

The Urban Displacement Project, a joint research and action initiative of the University of California, Berkeley, and the University of Toronto, analyzes income patterns and housing availability to determine the level of displacement risk at the census tract level.

The Urban Displacement Project (data as of 2023) identified tracts in and around the central part of the City of Fresno and parts of the areas around Selma and Orange Cove as being "at risk of displacement" (see Figure 1A-246). Some census tracts in the City of Fresno are categorized as an even higher displacement risk. However, even when the census tracts overlap with unincorporated areas, the data is heavily represented by the characteristics of the residents and housing in the cities. Elsewhere in the county, the unincorporated communities are consistently placed in the lowest category of "Lower Displacement Risk".

As found in the analysis of overpayment, for-sale home costs have increased in all unincorporated communities with available data, by an average of 6.9% (Shaver Lake) to 12.8% (Tranquillity) annually since 2014. In contrast, a handful of communities, including Calwa, Cantua Creek, Riverdale, and Tranquillity, experienced a decrease in median gross rent since 2015, while others experienced increases. The greatest increase was in Del Rey, at 10.9% annually. As presented in Table 1A-20, incomes have increased more rapidly in western Fresno County.

The ACS estimates that, since 2014, the median income in Parlier has increased by an average of 2.9% annually. When comparing change in median income to change in home prices, it appears that wage increases have kept pace with rental costs, but home value increases have risen at nearly five times the rate of wages, suggesting a higher displacement risk for current and prospective homeowners. In comparison, countywide, median incomes have increased by approximately 4.4% annually and rents have increased by 3.2% on average. While Zillow does not report countywide home values, the ACS estimates that these have increased by 3.9% annually, on average. Therefore, in contrast to conditions in Parlier, there may be a moderate decrease in displacement risk countywide due to home costs. The inflated displacement risk resulting from discrepancies in wages and housing costs in Parlier reflects a disproportionate need for affordable options in the city.

As shown in Table 1A-20, there have been larger increases in the median income in communities in western Fresno County, with the exception of Monmouth and Riverdale. However, despite the increases, the estimated median incomes remain lower than those in many of the communities in eastern Fresno County. When the average annual increase in median income exceeds the increases in housing costs, it may be assumed to be an indicator of decreasing displacement risk that results from high housing costs. However, in the case of communities where the median income is below the threshold for the very low-income category, this assumption may not hold true. Further, in many communities that have seen rapid increases in median income, home values and rents have increased at similar paces. For example, Laton experienced a rapid increase of 10.5% annually, but home values increased by 11.9% and rents by 9.0%. Situations such as this likely indicate that the median income increased due to an influx of higher-income households that increased demand for housing and, thus, home costs increased to meet demand, rather than an increase in wages for existing households.

Changes in income alone do not necessarily indicate increased, or decreased, displacement risk. However, when paired with changes in housing costs, discussed in the Overpayment analysis, patterns of changing displacement risk associated with cost burden begin to appear. Those areas designated as vulnerable or with an elevated displacement risk, according to the Urban Displacement Project, are those that have experienced changes in housing availability or cost, due to demand, in recent years. During outreach efforts for the Housing Element update, stakeholders identified a need for market-rate housing to help balance income distribution and displacement risk in the county. While not isolated to the unincorporated county, a focus on constructing affordable units can drive away moderate- and higher-income households that may then face a shortage of units as fewer market-rate units are constructed, thus encouraging a potential concentration of lower-income households where affordable units were built.

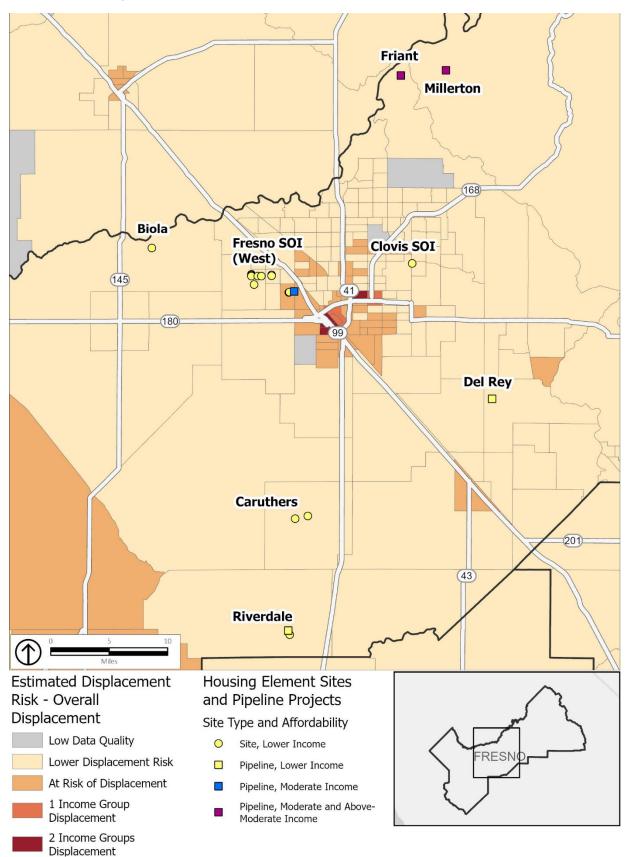


Figure 1A-246: Communities with Elevated Displacement Risk

Source: UC Berkeley Urban Displacement Project; County of Fresno, 2023.

	Mediar	1 Income	Average Annual		
Select Communities*	2014	2020	Change		
Eastern Fresno County					
Auberry	\$50,221	\$67,092	5.6%		
Big Creek	\$82,917	\$63,250	-4.0%		
Calwa	\$18,625	\$45,458	24.0%		
Centerville	\$85,833	\$85,469	-0.1%		
Del Rey	\$31,222	\$29,766	-0.8%		
Friant	\$18,884	\$52,955	30.1%		
Malaga	\$38,350	\$42,792	1.9%		
Mayfair	\$40,625	\$35,000	-2.3%		
Minkler	\$81,339	\$68,026	-2.7%		
Old Fig Garden	\$63,358	\$87,578	6.4%		
Shaver Lake	\$80,481	\$105,000	5.1%		
Squaw Valley	\$63,629	\$68,333	1.2%		
Sunnyside	\$63,222	\$96,271	8.7%		
Tarpey Village	\$58,641	\$54,750	-1.1%		
Western Fresno County	•	· · ·			
Biola	\$26,750	\$54,375	17.2%		
Bowles	\$31,250	\$72,288	21.9%		
Cantua Creek	\$31,181	\$36,694	2.9%		
Caruthers	\$44,375	\$55,357	4.1%		
Easton	\$58,813	\$75,259	4.7%		
Laton	\$29,865	\$48,598	10.5%		
Monmouth	\$34,500	\$29,583	-2.4%		
Raisin City	\$18,750	\$39,444	18.4%		
Riverdale	\$48,350	-4.6%			
West Park	\$36,389	\$65,625	13.4%		
	Eastern	Fresno County Average	5.1%		
	Western	Fresno County Average	8.6%		
	Unincorporat	ed Fresno County Total	6.6%		

Table 1A-20 Change in Median Income, 2014-2020

*Note: Median income data is not available for all unincorporated communities in Fresno County. *Source: 2016-2020 ACS, 2010-2014 ACS*

Other Relevant Factors

In addition to the indicators analyzed previously, there are several other factors that can influence housing mobility and access to opportunity in a jurisdiction. For example, land use patterns influence where residential uses are built, at what density, and their proximity to other uses. As is common in unincorporated areas throughout the state, the unincorporated parts of Fresno County are largely low-density and agricultural development, with most services in or adjacent to incorporated jurisdictions. Other factors may include mortgage lending patterns, public and private investment, and historical policies.

Land Use and Zoning Patterns

Typically, a jurisdictions' general plan and zoning maps include territory outside their city limits, known as spheres of influence (SOIs) that the city expects to eventually annex or that the city would like to see preserved or developed in a particular manner under county jurisdiction. SOIs are therefore covered by both the County's General Plan and a city's general plan. Under California law, there is no hierarchy among city plans and county plans; all plans have equal status. Legally, Fresno County continues to regulate land use according to its General Plan and any City-County memorandum of understanding that applies until land is annexed to the city.

Zoning in unincorporated Fresno County is predominantly related to agricultural uses and resource conservation outside of the cores of unincorporated communities. Areas with residential zoning are largely dominated by single-family development. Typically, zones that allow higher-density residential are within the SOIs of jurisdictions, where there is greatest access to utilities and other services to support higher-density development. The largest areas of single-family zoning found in unincorporated communities are in the communities of Squaw Valley, Auberry, Riverdale, Caruthers, Shaver Lake, and unincorporated islands within the City of Fresno.

While there are several zones that allow higher-density residential uses, including the R-2, R-2A, R-3, and R-3A zones as well as several commercial zones, such zones are primarily applied to areas adjacent to incorporated cities and within the unincorporated islands within the City of Fresno where there is greater access to services, shopping, and jobs. However, to increase the variety of housing types available in other areas of the county, the County will encourage the construction of ADUs and middle-density housing to meet a wider range of housing needs than is traditionally served by single-family development (Program 33).

History of Development

The Fresno County Historical Society reports that the first European immigrant to enter the San Joaquin Valley in 1772 was Pedro Fages, who later became governor of the Californias. The County was formed from portions of the three surrounding Mariposa, Merced, and Tulare Counties in 1856, with the original county seat in the settlement of Millerton. The earliest communities, including Millerton and Centerville, were established along the banks of the San Joaquin and Kings Rivers where flooding was frequent and constrained growth. As a result of construction of the Friant Dam in 1944, to control flooding in the valley, the original town of Millerton was largely covered by Millerton Lake, the remains of which can be seen during drought years.

Early communities were established as stage stops and in response to the southern extension of rail lines to serve the gold rush activities in the north. The county seat was relocated to Fresno Station, now the City of Fresno, in 1872. Many Millerton residents, following flooding damage to the town and attracted to the convenience of the railroad at Fresno Station, relocated to Fresno. Pollasky, now the community of Friant, was at the terminus of the Pollasky Railroad, the result of a failed plan by Marcus Pollasky to build a rail line from Fresno across the Sierra Nevada to the east, getting only as far as Friant. However, this extension

APPENDIX 1A: COUNTY OF FRESNO

of rail line was eventually completed by the Southern Pacific Railroad. The shaping and location of communities in Fresno County, both incorporated and unincorporated, was largely spurred by the extension of railroad lines and agricultural opportunities.

The western side of Fresno County, which originally was shaped by stagecoach stops, ferry crossings over the San Joaquin River, and the extension of rail lines to ship supplies to gold mining operations in the north, experienced slower growth than the east, primarily due to the lack of potable water supplies and frequent droughts. Early western communities included Caruthers, Firebaugh, Mendota, Riverdale, and Huron, all serving as rail stops for wheat shipping. Fresno City on the Slough, one of the first settlements at the head of the San Joaquin Valley River waterway in the Laguna de Tache track, saw a decline by the turn of the century with the progress of the railroad connections as people concentrated in rail spur settlements.

The lack of sustainable water was an issue that shaped the growth in the western portion of the county. Initial efforts at wheat farming to supply mining operations proved difficult due to salt and mineral content in the soil and water, subsequently leading to cattle and sheep ranching as the main "crop." At the turn of the century, two major landowners in the west, Henry Miller and Charles Lux, were headquartered in the community of Firebaugh, controlling the Kings River and San Joaquin River water rights, which proved a significant factor in the growth pattern in the western county. With the advent of irrigation systems and when potable water resources were delivered to western communities from the Kings River, the agricultural base of cantaloupe, fruit and nut trees, and other row crops took firm hold in the western county.

Discovery of oil and the invention of deep well extraction also shaped the development in western Fresno County, bringing settlers into the area. The greatest oil field activity was in the vicinity of Coalinga, attracting the Coast Range Oil Company of Los Angeles, producing hundreds of barrels a day by the turn of the century. Other oil field holdings by Shell Oil Company and other oil companies sparked the rise of many small towns to house the workers that were eventually absorbed back into the land as just clusters of buildings.

Fresno County's economic base continues to be agriculture. Investment in regional water infrastructure and innovative ways to address water quality, conservation, and reuse are essential to stimulate job creation and associated residential, commercial, and public facilities growth. As towns began to incorporate in Fresno County, unincorporated communities often became satellites for workers in the surrounding farmland. Vacation and retirement-based communities of Shaver Lake, Auberry, and Squaw Valley are established in the east at the foothills of the Sierra Nevada. Residential development is primarily low-density single-family, although slightly higher densities accommodating attached single-family homes, duplexes, and creative lot configurations may be located adjacent to incorporated city boundaries or within unincorporated islands. Overall, incomes and home values in the eastern portion of the county are higher than most of the incorporated cities.

Given the agricultural nature of the unincorporated area, the County aims to continue to focus higher intensity uses and services in unincorporated community centers and within the SOIs to enhance access to essential infrastructure and services.

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 unincorporated county has been prioritized based on need and available funding, which has prevented disinvestment in any area of the county. County facilities and infrastructure in remote areas typically experience less "wear and tear" in remote areas due to less-frequent usage; however, any infrastructure or facilities in need of improvement are identified for investment in the County's five-year Capital Improvement Plan (CIP). The CIP is funded from a variety of sources that can each be used for specific purposes such as expansion of waste facilities and service capacity, libraries, water and wastewater improvements, and parks, amongst other projects. Funds are allocated to improve roadways and other transportation infrastructure in the Roadway Transportation Plan. Priority for funding is based on projects that will result in the greatest community benefit, mitigate existing issues, and address public demand and need, therefore ensuring that projects occur throughout the county. Recent target areas for investment include, but are not limited to:

- Wastewater Treatment Facilities. The County has allocated funding to rehabilitate the Shaver Lake Wastewater Treatment Facility, following damage sustained during the Creek Fire, and improvements to the Caruthers Wastewater Treatment Plant to support current capacity and future capacity needs.
- Public Facilities Improvements. The County has allocated funding to complete improvements to the Riverdale Memorial Hall, repairs to park facilities where needed, and to expand or construct libraries to meet the needs of the growing population in the county, and to serve as an important center for community events and resources.

During the 2021 calendar year, the County of Fresno was approved to receive \$194,000,000 of stimulus funding from the American Rescue Plan Act (ARPA) of 2021. Eligible uses for the ARPA include, but are not limited to, water, wastewater, and broadband infrastructure improvements. These projects include improved connections between communities, availability of and accessibility to community resources and facilities, and more. The County will continue public investment throughout their jurisdictions and will encourage the same from private investment, so all residents have access to improved transportation, safer streets, additional recreational amenities, and other outcomes of public and private investment (see Programs 16 and 32).

Local Knowledge

The Fresno County General Plan includes land use plans for unincorporated areas surrounding the 15 incorporated cities within the county, plans for unincorporated communities and neighborhoods, and six specific plan areas. Areas outside of incorporated cities and community plan areas are covered by five regional plans.

Regional plans have been prepared for sub-areas of the county where more precise policies and standards are needed for land use, transportation, and environmental resource management to address specific

resource issues, including open space and preservation of actively producing agricultural land. The regional plans are:

- **Coalinga Regional Plan.** Encompasses the southwest section of the county bound to the east by I-5 and the southern boundary of the county, excluding the plan area of the Coalinga Community Plan.
- **Kings River Regional Plan.** Covers the area extending from the source at Pine Flat Lake through the cities of Sanger and Reedley and one-quarter of a mile surrounding the river channel to the Tulare County border to preserve agriculture and open space along the river channel.
- Sierra-North Regional Plan. Covers northeastern Fresno County and land within the Sierra Nevada
 range east of the Friant Kern Canal and north of the Kings River, totaling approximately one-third of
 the county acreage. This plan excludes the area covered by Shaver Lake Community Plan, the majority
 of which is held by the federal government.
- Sierra-South Regional Plan. Encompasses the area from the Kings River Regional Plan on the northwest, the South Fork of the Kings River to the north, Kings Canyon National Park on the east, and the Friant-Kern Canal to the west along the southeastern edge of the county with the purpose of preserving the scenic open space character of the area and concentrating new development to minimize impacts to resources.
- Westside Freeway Sub-Regional Plan. Includes the area along I-5 and the commercial development at interconnections with the rural communities of Nees, Panoche, Derrick, Dorris, and Jayne.

Unincorporated Area Community Plans have been prepared to address issues unique to different locales within the county, including: land use, housing, circulation, provision of public services, and other specifically relevant concerns. Common themes for these include maintaining compact urban boundaries, optimizing provision of urban services, and minimizing the intrusion of urban development on productive agricultural land. Community plans have been developed for Biola, Caruthers, Del Rey, Easton, Friant, Lanare, Laton, Riverdale, Shaver Lake, and Tranquillity. These plans enable more focused planning efforts to address local needs and growth.

Specific Plans have been prepared for portions of the unincorporated county for which more precise development guidance is desired to address developmental pressure and distinct physical characteristics and limitations, including:

- Shaver Lake Forest Specific Plan. Covers acreage adjacent to Shaver Lake in eastern Fresno County
 primarily accommodating seasonal fluctuations in limited residential, commercial, recreation, and
 public/quasi-public land use.
- Bretz Mountain Village Specific Plan. Designates the area primarily for seasonal recreation residential uses, limited supporting commercial uses, open space, and recreational uses, requiring infrastructure capacity improvements to accommodate growth.

- Wildflower Village Specific Plan. Contiguous to the Shaver Lake Specific Plan area, this specific plan also plans for seasonal recreation residential uses, open space and recreational uses, and requires infrastructure capacity improvements to accommodate growth.
- Millerton New Town Specific Plan. East of the unincorporated community of Friant and south of the Millerton Lake State Recreation Area, the plan includes limited residential, commercial, open space and recreation uses and requires significant water and wastewater system improvements to support development.

On November 24, 2020, the Board of Supervisors approved amendments to the General Plan Land Use Element and the Zoning Ordinance to increase residential densities in certain land use designations and zone districts (R-2, R-2A, R-3, R-3A, R-4, C-4, and R-P) to 20 units per acre. County staff continued to coordinate with staff of both the cities of Fresno and Clovis on development projects to promote compact urban development and infill of vacant and underutilized land. The County has prepared a format and guideline for new plans and updates to existing plans. During the 2021 calendar year, the County was awarded funds from the Fresno County Council of Governments (FCOG) to create a new guidance document that will establish procedures for the preparation of newly identified community plans and updates to existing plans to incorporate recent requests and concerns identified in the General Plan Update community outreach process.

The County continues to implement General Plan policies related to the preservation of agricultural resources by directing growth to cities by way of Pre-General Plan Amendment consultation for any proposed land use designation change within the SOI of cities and two miles beyond, and referral of developments for possible annexation. In response to this objective, potential land use applications received by the County have been referred to cities within Fresno County.

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. Fresno County 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 and federal law, and referral of fair housing complaints to appropriate agencies. Through this process, the County protects residents from discrimination on the basis of race, color, religion, national origin, sex/gender, handicap/disability, and familial status. More specifically, the County complies with state and federal housing laws as follows:

 Title VI of the Civil Rights Act of 1964; Fair Housing Act of 1968; Fair Housing Amendments Act of 1988. The County complies by ensuring its actions related to housing are not discriminatory through County protocols, decision-making procedures, and adhering to non-discrimination requirements of federal funding programs.

- Rehabilitation Act of 1973 (see Fair Housing Act) and American Disabilities Act. The County complies through its accessibility protocols, administered, and enforced by the County's ADA Coordinator, and complies with the ADA through the review and issuance of building permits by the Department of Public Works and Planning.
- California Fair Employment and Housing Act and associated regulations. The County complies through established County protocols for hiring and decision-making, mandatory training for County staff, and legal counsel and advisement.
- California Government Code Section 65008 (lawful occupation and protected classes, special tax exemptions and discrimination based on method of financing). The County ensures that its actions are not discriminatory through its Department of Public Works and Planning and the Risk Management Division of the Department of Human Resources. Programs are included in this Housing Element to facilitate housing for all households, including protected classes (e.g., programs regarding special needs housing and care facilities).
- Government Code Section 8899.50 (affirmatively furthering fair housing). This section documents compliance with Affirmatively Furthering Fair Housing requirements.
- AFFH Final Rule (legal compliance and issues in the jurisdiction). There are no pending lawsuits, enforcement actions, judgements, settlements, or findings related to fair housing and civil rights in the jurisdiction of the County.
- California Government Code Section 11135 et. seq. (equal access to programs/activities for those who are disabled). The County complies with anti-discrimination requirements through programs, protocols, and procedures administered by the County's ADA Coordinator in the County Administrative Office and the County's Employment Services Division in the Department of Human Resources.
- California Government Code Sections 65863 (no-net-loss) and 65913.1 (least cost zoning). The County has documented compliance with sufficient capacity on land zoned with appropriate standards to accommodate the RHNA and will ensure compliance with no-net-loss as described in Program 14 of the County's Action Plan.
- California Government Code Section 65913.2 (excessive subdivision standards). The County
 has typical subdivision standards in compliance with the state law.
- California Government Code Section 65302.8 (growth control). The County complies as it has no growth control measures that limit the number of housing units that can be built in a given year.
- California Government Code Section 65583 (Housing Element law). This Housing Element documents compliance with Housing Element Law.
- Density Bonus Law (Government Code Section 65915). While the County has in its Zoning Ordinance a density bonus that otherwise complies with State law, the County will amend its Ordinance to include additional language to reflect AB 2694 signed by the Governor on September 19, 2024. The County will also amend its permitted uses tables to correct a clerical error and remove "Density Bonus" as a use in order to clarify that the density bonus is permitted in every zone where residential uses are permitted.

- No-Net-Loss (Government Code Section 65863). The County has identified a surplus of sites available to meet the Regional Housing Needs Assessment allocation.
- Housing Accountability Act (HAA) (Government Code Section 65589.5). The County 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 County
 currently allows emergency shelter by-right in the commercial zone C-4 and industrial zone C-M.
- Senate Bill 35 (Government Code Section 65913.4). The County complies 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. As part of Program 22, the County will define and publish the streamlined application procedure.
- Senate Bill 330 (Government Code Section 65589.5). The County complies with SB 330, relying on regulations set forth in the law for processing preliminary application for housing development projects, conducting no more than five hearings for housing projects that comply with objective general plan and development standards, and making a decision on a residential project within 90 days after certification of an environmental impact report or 60 days after adoption of a mitigated negative declaration or an environmental report for an affordable housing project. The County will add additional discussion of the SB 330 preliminary application process to the code as part of Program 22.
- California Fair Employment and Housing Act (FEHA) and Federal Fair Housing Act. The County provides protections to residents through referrals to legal assistance organizations, such as the California Rural Legal Assistance, and has included Program 29 to work with Fresno County Housing Authority to distribute informational materials produced by the Housing Authority on resources for renters, tenant information, and landlord information at least annually with the intent of reducing, or eliminating, discrimination.
- **Review Processes (Government Code Section 65008).** The County reviews affordable development projects in the same manner as market-rate developments, except in cases where affordable housing projects are eligible for preferential treatment.
- Assembly Bill 686 (Government Code Section 8899.50). The County has completed this Assessment of Fair Housing and identified programs to address identified fair-housing issues in Table 1A-22, Factors Contributing to Fair Housing Issues.
- Equal Access (Government Code Section 11135 et seq.). The County has included Program 29 to continue to provide translation services for public meetings and materials and currently 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 (FHC-CC) for feedback on housing need, fair housing concerns, and opportunities to affirmatively further fair housing throughout the county. FHC-CC is a non-profit, civil rights organization

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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, FHC-CC 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, FHC-CC 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.

FHC-CC 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, FHC-CC 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 FHC-CC 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 County has included Program 29 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 County's website and in public buildings, and conduct biannual trainings for landlords on fair housing from HUD's Office of Fair Housing and Equal Opportunity (FHEO) to support outreach, education, and compliance efforts promoting fair housing in the unincorporated areas of Fresno and its partners cities. Program 33 was influenced by FHC-CC's input, with its focus on facilitating ADU, duplex, triplex and fourplex housing options to encourage a greater variety of unit types and sizes throughout the jurisdiction to promote mobility and integration.

Discrimination Cases

In 2020, 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% 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 unincorporated residents between January 2013 and April 2021. However, three inquiries were made, one of which was against a public entity (e.g., Fresno County Housing Authority or the County of Fresno). All three inquiries were determined to not be valid issues. While there were no formal cases from unincorporated residents, 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.

HCD Technical Assistance Letter

The County of Fresno is in receipt of a letter of Technical Assistance from the Department of Housing and Community Development (HCD) dated August 5, 2024 noting the County withdrawal of the No Place Like Home (NPLH) grant application for the Libre Commons project in the City of Fresno (the County serving as a co-applicant with the developer (UpHoldings, LLC)). The County coordinated with HCD on January 15, 2024 and obtained direction to augment Program 14 with a requirement to include a statement of the County's obligation to Affirmatively Further Fair Housing and an accompanying analysis of project consistency with the law for decisions on housing projects that involve public funding and require consideration by the Fresno County Planning Commission or Board of Supervisors.

Sites 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 identified parcels in relation to fair housing factors to determine whether the sites inventory further entrenches existing fair housing issues. When patterns of fair housing issues do overlap with sites identified in the inventory, the County is obligated to establish strategies to mitigate and improve conditions contributing to fair housing issues.

As detailed in the previous section, the County addressed all its above moderate- and moderate-income RHNA and a portion of its lower-income RHNA through development that is already in the application review process and capacity based on projections of manufactured and rural single-family homes. In order to discuss the identified lower-income sites in relation to existing development contexts, pipeline projects that are already in the approval process have also been included in the discussion. Accordingly, the following analysis only addresses the sites identified to accommodate the County's remaining lower-income RHNA balance. What follows is an analysis of the distribution of the lower-income opportunity sites in the County's sites inventory and the pipeline sites compared to countywide patterns in the context of the fair housing issues discussed in the previous assessment.

Summary

Table 1A-21 summarizes key factors of fair housing conditions of the unincorporated areas that contain lower-income opportunity sites. The table is organized by area and census tract and shows the housing

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capacity of each site (which may be one or a collection of parcels), as well as the proportion of capacity that each site represents. A summary of the key factors for all the sites is provided below, followed by a more detailed analysis of each unincorporated area.

- TCAC Resource Category. With a few exceptions, the sites Of the combined capacity of sites and projects, 73 percent are in areas identified as having high or highest access to resources, and 52 percent of lower-income sites capacity is located in high or highest resource areas. The table displays TCAC categories as measured in both 2021-2023 and 2023-2025 to show patterns of change. While the The Biola area was designated as a high resource area in 2023 and a low resource area in 2025. Though some of the designation change may be reflective of changes in methodology between the two analysis years, the County is committed to promoting place-based revitalization and affordability areas through programs in the Housing Element. Additionally, the inclusion of a site in this community represents an investment in affordable housing in rural communities. and part of Two tracts in the West Fresno SOI area were both identified as having high access to resources in 2023-moderate access to resources in 2021, both are designated as a high-low resource areas in 20232025. One site in the Caruthers area is within a block group that was designated a moderate resource area in both years. Additionally, though two parcels in the West Fresno SOI are in an area that was designated as low resource, the area is in close proximity to higher-resource areas and has excellent access to transit, and so was determined to be suitable for inclusion in the RHNA inventory. Between 2023 and 2025, the resource designation in the Del Rey area shifted from "high segregation and poverty" to "moderate resource".
- TCAC Education Score. With two exceptions, the sites are in areas identified as having high and/or improving education scores as of 2023, with values displayed as measured in both 2021 and 2023 to show patterns of change. Use of this index score was not continued in the 2025 analysis. In part of the Clovis area, the education score decreased a couple of points; however, the education score was still extremely high (89 out of 100). In Biola, the score dropped more than a couple points and and Caruthers scores were moderate and scores in one tract within the West Fresno SOI were relatively low, the County is focusing on addressing educational performance through Programs 30 and 31.
- TCAC High Segregation and Poverty. As measured in the 2023 2025 COG level analysis of opportunity areas, none of the areas were considered areas of high segregation and poverty. Though two parcels in the pipeline project in the West Fresno SOIDel Rey are is in an area that was designated an Area of High Segregation and Poverty in 20212023, as of 2023 2025 the area is no longer designated as such, indicating improving conditions.
- CalEnviroScreen (CES) Composite Scores. With few exceptions, the The majority of unit capacity in sites and pipeline projects (65% of all capacity) were outside of census tracts considered to be disadvantaged (≥75th percentile) due to a combination of population and pollution exposure factors. The sites in Caruthers and Riverdale have higher health risks due to pollution factors such as exposure to pesticides potentially used in adjacent agricultural areas. The pipeline project in Del Rey is in a disadvantaged community. While the environmental factors for the two sites and one pipeline project in tract 38.07 West Fresno SOI are reported to be higher levels of PM 2.5 emissions and hazardous

waste exposure, a precise land use(s) that would create some risk of exposure to hazardous waste was not apparent and the sites are both over 4,600 feet from Interstate 99 (a primary source of PM 2.5; no industrial uses within a mile of either site).

- Jobs Index. While the Jobs Index figures are shown, the numbers do not necessarily accurately reflect actual proximity to jobs. Sites within the City of Fresno's sphere of influence have roughly the same proximity to employment opportunities based on travel distance. Sites in Biola, Caruthers, <u>Del Rey</u>, and Riverdale are farther away from the employment nodes in Fresno and Clovis.
- RCAA. All sites/pipeline projects but one are outside of Only one site in the Clovis SOI is in a census tract identified as a racially concentrated area of affluence (RCAA); all other sites are not. However, the site is identified for lower income capacity, and so is expected to help to mitigate existing concentrations of affluence. The one pipeline project, Friant Ranch, is technically within a census tract identified as an RCAA. However, as discussed in the earlier section on RCAAs in the county, that census tract is so large (24.9 square miles) that its designation as an RCAA requires greater geographic breakdown. The Friant Ranch project is directly adjacent to the 1.3-square mile Friant community (a census designated place), which contains 40% of the tract's households and features household demographics (e.g., median household income of roughly \$56,000) that do not align with the characteristics of an RCAA. The balance of 379 households in that tract were spread broadly over the remaining 23.6 square miles and reported household incomes large enough to bring the overall tract median up to over \$90,000. This indicates that the area around the Friant community is not an RCAA. Conversely, in 2021³, the Millerton CDP had a median household income of \$58,750. This suggests that the Millerton area could be considered an RCAA even while the tract as a whole is not.
- Median Household Income. Sites are generally in census tracts where the median household income is at or above the county median. Sites and pipeline projects in Biola, Riverdale, <u>Del Rey</u>, and Caruthers are in census tracts with lower median household incomes, influenced by lower paying agricultural jobs. Tract 38.07 of the West Fresno SOI also has a median income below the county median due in part to high levels of unemployment in the area. The majority of Just under half of lower income capacity (42 percent) is on sites in census tracts where median household income is above the state median.
- Households in Poverty. Most sites and pipeline projects are outside of the concentrations of areas with high rates of poverty in central Fresno, with the exception of sites in Tract 38.07 and the pipeline project in Tract 69.
- **Percent of Households with a Disability.** Sites are all in census tracts with rates of disability below 20%, which is typical of most of the county.

³ 2017-2021 ACS data was used for this comparison because Millerton only existed as a CDP beginning with the 2020 census, so CDP data for Millerton was not tabulated in the 2019-2019 ACS.

- Percent of Children in Female-Headed Households. Most sites are in census tracts where the percentage is below 20%. One site in the West Fresno SOI<u>a and the sites</u> in Biola, and the pipeline project in and the Southeast Fresno SOIDel Rey have rates higher than 20%.
- **Percent Non-White.** The percentage of non-white residents is generally consistent with the countywide average (given that the predominant population identifies as Hispanic).
- **Percent in Overcrowded Households.** Sites are not in census tracts where any substantial percentage of households live in overcrowded conditions.
- Percent of Rental and Owner Households Overpaying for Housing. Sites are in census tracts where rates of overpayment were higher than average for both rental and owner households. Rates of renter overpayment were higher in census tracts in parts of the City of Fresno sphere of influence, due in large part to the higher costs of housing, as well as in Del Rey, due to the limited availability of affordable relatively housing in the area, combined with relatively low incomes.
- Displacement Risk. The sites are all in areas that are assigned the lowest displacement risk by the UC Berkeley Urban Displacement Project with the exception of tract 38.07 (in the West Fresno SOI). While this tract is identified as "At Risk" for very low-income households (0-50%), UC Berkeley also indicates that this area is not a hot market and estimates there is some potential displacement or risk of displacement of the given population in these tracts, though any actual displacement may not be occurring (and are categorically less than the 10% estimate of the next category. Based on the County's understanding of this area, the displacement risk is considered to be null to nominal at most.

	Capacity to Address Remaining RHNA		RHNA ¹													<u>Overpa</u>	<u>yment</u>		
СТ	Lower Income Capacity (PCT of Lower)	Moderate Income Capacity (PCT of Moderate Capacity)	Above Moderate Income Capacity (PCT of Above Moderate Capacity)	<u>Total</u> <u>Capacity</u> <u>(PCT of</u> <u>Total</u> <u>Capacity)</u>	TCAC Resource Category, (2023) & 2025	Edu Score, TCAC 2023 ⁵	<u>HS&P,</u> <u>TCAC</u> <u>2025</u>	<u>CES</u> <u>4.0</u> PCTL	<u>Jobs</u> Index ³	<u>RCAA</u>	<u>Median</u> <u>HH</u> Income	<u>HH in</u> Poverty	<u>PCT Pop.</u> with a Disability	PCT of Children in FH HH	PCT Non- White	PCT Over- crowded HH	PCT Renter HH	PCT Owner HH	<u>Displace</u> <u>-ment</u> <u>Risk</u>
<u>Biola</u>		-		-		•	-	•	•				•					•	
<u>41</u>	<u>20 (2%)</u>	<u>0 (0%)</u>	<u>0 (0%)</u>	<u>20 (1%)</u>	(High) Low ²	<u>42</u>	No	<u>65</u>	<u>47</u>	<u>No</u>	<u>\$53,750</u>	<u>27%</u>	<u>12%</u>	<u>30%</u>	<u>80%</u>	<u>2%</u>	<u>43%</u>	<u>28%</u>	Lower
Caruthers	<u>s</u>																		
<u>75</u>	<u>210 (19%)</u>	<u>0 (0%)</u>	<u>0 (0%)</u>	<u>210 (11%)</u>	(<u>High and</u> <u>Moderate)</u> <u>High²</u>	<u>57</u>	<u>No</u>	<u>83</u>	<u>43, 51</u>	<u>No</u>	<u>\$45,587</u>	<u>24%</u>	<u>9%</u>	<u>16%</u>	<u>75%</u>	<u>17%</u>	<u>37%</u>	<u>33%</u>	Lower
Clovis SC	<u>)</u>		-						-						-			-	
<u>58.04</u>	<u>58 (5%)</u>	<u>0 (0%)</u>	<u>0 (0%)</u>	<u>58 (3%)</u>	<u>(High) High</u>	<u>89</u>	No	<u>69</u>	<u>74</u>	No	<u>\$70,866</u>	<u>18%</u>	<u>17%</u>	<u>7%</u>	<u>67%</u>	<u>1%</u>	<u>30%</u>	<u>27%</u>	Lower
Riverdale	2		-			-		-	_	-	_	-		-	_	-	-	_	
<u>77</u>	<u>173 (15%)</u>	<u>0 (0%)</u>	<u>0 (0%)</u>	<u>71 (4%)</u>	<u>(High) High²</u>	<u>90</u>	No	<u>88</u>	<u>27</u>	<u>No</u>	<u>\$50,434</u>	<u>23%</u>	<u>11%</u>	<u>13%</u>	<u>72%</u>	<u>16%</u>	<u>47%</u>	<u>19%</u>	Lower
Fresno S	OI (West)	•		•				-		-									
<u>38.034</u>	<u>204 (18%)</u>	<u>0 (0%)</u>	<u>0 (0%)</u>	<u>204 (10%)</u>	<u>(High) High</u>	<u>51</u>	No	<u>70</u>	<u>6, 12</u>	No	<u>\$67,227</u>	<u>11%</u>	<u>11%</u>	<u>13%</u>	<u>71%</u>	<u>10%</u>	<u>80%</u>	<u>29%</u>	Lower
<u>38.04</u>	<u>175 (15%)</u>	<u>0 (0%)</u>	<u>0 (0%)</u>	<u>175 (9%)</u>	(<u>Moderate)</u> Low	<u>49</u>	No	<u>66</u>	<u>28</u>	No	<u>\$64,898</u>	<u>17%</u>	<u>12%</u>	<u>19%</u>	<u>82%</u>	<u>9%</u>	<u>48%</u>	<u>37%</u>	Lower
<u>38.07</u>	<u>127 (11%)</u>	<u>45 (11%)</u>	<u>0 (0%)</u>	<u>172 (9%)</u>	(Low) Low	<u>21</u>	No	<u>91</u>	<u>22</u>	No	<u>\$35,476</u>	<u>34%</u>	<u>20%</u>	<u>37%</u>	<u>81%</u>	<u>5%</u>	<u>45%</u>	<u>31%</u>	At Risk
Millerton	•	•	•		•	•	•	•				•	•				•	•	
<u>64.05</u>	<u>0 (0%)</u>	<u>129 (32%)</u>	<u>73 (14%)</u>	<u>202 (10%)</u>	<u>(Highest)</u> <u>Highest²</u>	<u>99</u>	No	<u>10</u>	<u>19</u>	Yes ⁶	<u>\$73,333</u>	<u>6%</u>	<u>12%</u>	<u>5%</u>	<u>28%</u>	<u>0%</u>	<u>13%</u>	<u>36%</u>	Lower
Friant		1	1	1			T		1		T		1	T	T	1			
<u>55.15</u>	<u>0 (0%)</u>	<u>225 (56%)</u>	<u>465 (86%)</u>	<u>690 (33%)</u>	<u>(Highest)</u> <u>Highest²</u>	<u>100</u>	No	<u>29</u>	<u>26</u>	<u>No⁷</u>	<u>\$90,982</u>	<u>7%</u>	<u>14%</u>	<u>1%</u>	<u>36%</u>	<u>0%</u>	<u>28%</u>	<u>32%</u>	Lower
Del Rey	·	i	i	·	(110.5.5)	i	·	,	i		ì		ì	ì	ì	i		ì	
<u>69</u>	<u>173 (15%)</u>	<u>0 (0%)</u>	<u>0 (0%)</u>	<u>173 (9%)</u>	(HS&P) Moderate ²	<u>79</u>	<u>No</u>	<u>89</u>	<u>52</u>	<u>No</u>	<u>\$40,573</u>	<u>33%</u>	<u>16%</u>	<u>33%</u>	<u>88%</u>	<u>21%</u>	<u>67%</u>	<u>48%</u>	Lower

Table 1A-21: Summary of Fair Housing Conditions in Areas with Housing Opportunity Sites

Abbreviations: CT - Census Tract; HS&P - Area of High Segregation and Poverty; RCAA - Racially Concentrated Areas of Affluence; PCT - Percent; PCTL - Percentile; HH - Household; FH HH - Female-Headed Household

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¹ Note that capacity identified on vacant sites to address the County's remaining RHNA, which only contains lower-income allocation.

² Resource level identified at the block group level rather than the tract level. As part of the TCAC opportunity area analysis, rural areas were assigned resource designations at the block group level, while urban areas were assigned resource designations at the census tract level.

³ Identified by block group, multiple values indicate multiple block groups with inventory sites identified to meet the lower-income RHNA.

⁴ This Census tract has been renumbered 38.11.

⁵ This index was not generated for the 2025 analysis.

⁶ While the census tract is not technically identified as an RCAA, further detailed analysis provided in the preceding discussion on RCAAs demonstrates that the community should be identified as an RCAA for the purposes of this sites analysis.

⁷ While the census tract is technically identified as an RCAA, further detailed analysis provided in the preceding discussion on RCAAs demonstrates that the community should not be identified as an RCAA for the purposes of this sites analysis.

Source: California Tax Credit Allocation Committee, 2021–2023 and 2023/2025; HUD (2014-2017); ACS (2015-2019); UC Berkeley Urban Displacement Project, PHASC Healthy Places Index, 2022

Analysis by Area

Fresno SOI (West)

A large percentage (6145%) of the identified capacity for lower-income opportunity units on vacant sites or in pipeline projects in the County's RHNA inventory is located in three census tracts to the west of the City of Fresno._In both 2021_2023 and 20232025, tract 38.03 was designated as a high resource area in TCAC's local-level analysis. In 20212023, tract 38.04 was designated as a moderate resource area in TCAC's local-level analysis, but in 2023_2025 was re-designated as a high_low resource area, which may have been due to methodology changes. In 2023, 20 percent of tracts and block groups within a region that were not identified as high segregation and poverty areas were evenly distributed into the high resource category, and an additional 20 percent were distributed into the highest resource category. The remainder were then divided evenly into the moderate and low resource categories. In the 2025 analysis, tracts and block groups were assigned one point for each category where the tract scored higher than the regional median. The total score was then assigned a category (e.g. three or fewer points were "low resource", 4 or 5 were "moderate resource", etc.). The 2023 methodology sought to incentivize equitable development to the same degree, but may have skewed rankings in regions with wide disparities between census tracts to show higher resource levels when compared to 2025.

The tract is not considered a Racially Concentrated Area of Affluence. By identifying sites in this area that could develop housing to accommodate lower-income households, the County can support the mobility of lower-income households into better-resourced areas. This tract has the second-highest share of lower-income unit capacity on sites or pipeline projects (18%). In 20212023 and 2025, tract 38.07 was considered a low resource area. an Area of High Segregation and Poverty, but in the 2023 analysis was designated a low resource area, indicating improving conditions. The area was not considered an area of high segregation and poverty in 2023 or 2025. Of sites in the West Fresno SOI, this tract had the smallest share of the identified capacity for lower-income opportunity units on vacant sites or pipeline projects in the County's RHNA inventory (131114% of the lower-income households, the County can support the development of additional rental housing options for the lower-income households already living in this area while also identifying sites in adjacent higher-resource areas.

Household incomes in these tracts are below the statewide median of \$87,100 (\$67,227, \$64,898, and \$35,476 -as of the 2015-2019 ACS, respectively). However, tracts 38.03 and 38.04 have relatively low levels of poverty, at 11% in 38.03 and 17% in tract 38.04. The development of housing that is affordable to lower-income households in this area is not expected to exacerbate concentrations of poverty, as poverty in the central areas of the county tends to be at its highest concentration in the central, northeast, and southern areas of the City of Fresno and its surrounding areas along with unincorporated areas west of the Kings River between Sanger and Reedley. In these areas, poverty rates tend to be above 30%. Sites within tract 38.07 area within this higher-poverty area.

This area also has relatively low levels of household overcrowding (10%_in tract 38.03, 9% in tract 38.04, and 5% in tract 38.07), which suggests that housing in this area may be appropriately sized for larger families. Tracts 38.03 and 38.04 have fairly low rates of children living in female-headed households, at 13% of children in tract 38.03 and 19% in tract 38.04. In Tract 38.07, 37% of children live in female-headed households. A higher rate of female-headed households may be related to lower income levels in this area. Though tracts 38.03 and 38.07 have moderately low rates of homeowner cost burden (2%9 and 31%, respectively), rates of homeowner cost burden are higher in tract 38.04 (31%). Conversely, the rates of renter household cost burden are much higher in 38.03, at 80% of renter households, but are lower in tract 38.04 (48%). Rates of renter overpayment are also lower in tract 38.07 (45%). By identifying sites in these areas that could accommodate lower-income households, the County can alleviate the cost burden on renter households in the area, including female-headed households, by creating more affordable housing opportunities.

The majority of residents in these census tracts identify as non-white (71% in tract 38.03, 82% in 38.04, and 81% in 38.07), which is similar to many areas of central, southern, and western Fresno County. The development of housing that is affordable to lower-income households in this area is therefore not expected to exacerbate any segregation conditions, as the majority of this region of the county identifies as non-white.

Tract 38.03 had relatively low scores on the HUD Jobs Opportunity Index (6 and 12 by block group with vacant sites identified), while tracts 38.04 and 38.07 had slightly higher scores of 22 and 28. These areas are predominantly residential, are not adjacent to many retail or office centers, and, in comparison to census tracts within incorporated cities, has more limited transit access (although Fresno Area Express Route 45 (30-minute headways) is within 1.5 miles of the site). Tracts 38.04 and 38.07 are slightly closer to Fresno and its commercial areas, which accounts for the slightly higher score. Through Program 32, the County will improve coordination with the City of Fresno (Fresno Area Express) and Fresno County Rural Transit to maintain and/or identify new routes to healthcare facilities, employment centers and shopping outlets. This will help to avoid generating a significant cost burden to lower-income households in this area through the cost of travel to work, health care centers, and other commercial areas.

Tracts 38.03 and 38.04 also had moderate education scores as evaluated by TCAC in 20212023, with scores of 44-51 in tract 38.03 and 30-49 in tract 38.04, where 100 is the highest score. In 2023, the tracts' scores increased to 51 and 49, respectively, indicating improving conditions in the area. In tract 38.07, the education score was 20 in the 2021 analysis and 21 in 2023. As part of Program 30, the County intends to work with the school district in this area to identify and address housing-related barriers to student performance.

The Healthy Places Index, created by the Public Health Alliance of Southern California, evaluates a range of social conditions that contribute to health outcomes and provides a score on a scale from 0 to 99, where higher scores indicate more positive health outcomes. The countywide average score was 13, and very few areas of the county scored in the top quartile. High-scoring areas in the county were the north side of Clovis,

a small part of Fresno City, the neighborhood of Clovis near Gettysburg Elementary School, and a few census tracts along the San Joaquin River. The tracts in West Fresno with the lower-income opportunity site scored in the 24th (38.03), 33rd (38.04), and 7th (38.07) percentiles. Low rates of preschool enrollment, lack of park access, limited tree canopy and low employment density were negative factors in this area, as were levels of PM 2.5 particles and drinking water contaminants. Low numbers of adults with health insurance also played a role in the area's low score. These patterns are similar to the overall patterns in the area's CalEnviroScreen (CES) 4.0 percentile. CES considers some similar social and environmental factors to the Healthy Places Index. Tracts 38.03 and 38.04 in west Fresno had scores in the 70th and 66th percentiles, respectively and therefore are not considered disadvantaged communities under SB 535. Tract 38.07 scored in the 91st percentile and therefore is considered a disadvantaged community under SB 535, although a number of key factors that contribute to this percentile score are difficult to identify (exposure to hazardous materials and distance from freeway and rail (over 4,000 feet for entire tract); especially given that the adjacent tract ranks much better.

Fresno SOI (Southeast)

A very small percentage (3%) of the identified capacity for lower-income housing units on vacant sites in Fresno County's RHNA inventory may develop in one tract in the Southeast Fresno area (tract14.14,). This tract was considered a high resource area in both the 2021 and 2023 analysis. Tract 14.4 was not considered a Racially Concentrated Area of Affluence or an area of High Segregation and Poverty.

In this census tract, 79% of the population identified as non-white, which is similar to many areas of central, southern, and western Fresno County. The development of housing that is affordable to lower income households in this area is therefore not expected to exacerbate any segregation conditions, as the majority of this region of the county identifies as non-white.

This tract had a low score on HUD's Jobs Index (11 out of 100). However, sites are in close proximity to Fresno's city limits and therefore are as close as possible to Fresno's job opportunities while still being in the unincorporated area. While this area of the county is located in close proximity to State Route 180, there is, compared to incorporated cities, more limited transit access. Fresno Area Express stops are located a few miles from the site in this area, and the site is along an FCRTA route. Through Program 32, the County will improve coordination with the City of Fresno (Fresno Area Express) and Fresno County Rural Transit to maintain and/or identify new routes to healthcare facilities, employment centers and shopping outlets. This will help to avoid generating a significant cost burden to lower-income households in this area through the cost of travel to work, health care centers, and other commercial areas.

This area had a moderate education score (69) as evaluated by TCAC in 2021, where 100 is the most positive score. In 2023, the tract's score increased to 77, indicating improving education outcomes in the area.

In the Healthy Places Index, this tract in the southeast Fresno unincorporated area had a low score in the 37.8th percentile. Negative environmental factors played a significant role in the score for this area,

including PM 2.5 and ozone levels and drinking water contaminants. Limited tree canopy and low park access scores were also factors with less positive scores in this area. Countywide, Healthy Places Index patterns are similar to the overall patterns in the area's CES 4.0 percentile, as CES considers some similar social and environmental factors to the Healthy Places Index.

The tract had a median household income of \$98,477, which is above the statewide median of \$87,100. Relatedly, only 16 percent of households in this census tract had incomes below the poverty line. The development of housing that is affordable to lower-income households in this area is therefore not expected to exacerbate any concentration of poverty. The area had a relatively low rate of household overcrowding, with fewer than 10% of households in the tract experiencing overcrowding (9%). In tract 14.14, 21% of children live in female headed households. This rate is moderate for the area. Among homeowners in these census tracts, between 29% of households experience housing cost burden, which is typical for the area. However, the rate of renter cost burden are high for the area, with 70% of renters in the tract experiencing cost burden. By identifying sites that could accommodate some of the County's lower income RHNA units in an area with high cost burden, the County can provide additional affordable housing opportunities for families that may be struggling with their current housing costs.

Biola

The lower-income opportunity site in the Biola community is located in Census Tract 41, with the site representing 2% of the County's lower-income capacity that was identified on vacant sites or in pipeline projects. This tract was identified as a moderate high resource area in the 2021-2023 TCAC analysis but was categorized as a highlow-resource area in 20232025. This change may be due in part to methodology changes between the two analysis years, as described in the West Fresno SOI discussion. The tract was not identified as a Racially Concentrated Area of Affluence.

In this census tract, 79% of residents identify as non-white, which is similar to many areas of central, southern, and western Fresno County. The development of housing that is affordable to lower-income households in this area is therefore not expected to exacerbate any segregation conditions, as the majority of this region of the county identifies as non-white.

This area had a moderate education score of 51-42 as evaluated by TCAC in 20212023, where 100 is the most positive score. In 2023, the score decreased to 42. Comparing data from the California Department of Education for 2019 (see Table 1A-10) and 2022 (latest available data) for Biola-Pershing Elementary, it appears that the number of socioeconomically disadvantaged students has decreased from over 96% to just under 85%. However, students appear to be farther behind the statewide average in terms of ELA and Math scores in 2022 compared to 2019. Chronic absenteeism and suspension rates are also much higher in 2022 compared to 2019. When looking at school performance for 2019 compared to 2018, students were improving on all factors, which could indicate that the pandemic had a substantial impact on the home lives and educational performance of students. Through Program 30, the County will meet with the school district in Biola -during the Community Plan Update process to identify housing factors that could impact school performance and solutions that could alleviate problems. Through Program 31, the County will update its

Comprehensive Economic Development Strategy for the unincorporated county and partner cities, including Biola. Actions in this program will help improve socioeconomic conditions and improve economic development opportunities for residents and businesses in Biola, which will create greater stability for students' home lives that will enable them to increase attendance and performance.

In the Healthy Places Index, the Biola area was given a score in the lowest quartile (20). This low score was driven in part by low scores in employment and income levels, low census response rates, low access to parks and limited tree canopy, and low job density. The Biola area also had less positive environmental scores, particularly for drinking water contaminants and PM 2.5 levels (dust from agricultural operations). These patterns are similar to the overall patterns in the area's CES 4.0 percentile. CES considers some similar social and environmental factors to the Healthy Places Index. However, Biola did not have a CES score in the 75th percentile or higher, and so was not considered a disadvantaged community under SB 535.

Of the communities in the county where lower-income opportunity sites have been identified, Biola had the second-lowest median household income at \$53,750. Though more than one-quarter of households have incomes under the poverty line (27%), this is moderate for the region. The development of housing that is affordable to lower-income households in this area is therefore not expected to exacerbate concentrations of poverty, as poverty in the central areas of the county tends to be at its highest concentration central, northeast, and southern areas of the City of Fresno and its surrounding areas along with unincorporated areas west of the Kings River between Sanger and Reedley. In these areas, poverty rates tend to be above 30%. Compared to other communities in the county, the area has moderate rates of children living in female-headed households (29%). The area has a low rate of households experiencing overcrowding in the area, at 1.5%, which may be a factor of the size of housing in the area. Of renter households in Biola, 43% experienced cost burden, compared to 28% of homeowner households. This indicates a need for housing that is affordable for lower-income households in this area. As part of Program 33, the County will also promote a greater variety of affordable housing options by promoting ADUs and expanding the ability to build duplex, triplex and fourplex housing in the Biola area.

The area had a Jobs Index rating of 47, which may indicate a moderate number of local jobs, particularly in the field of agriculture. Biola itself is a small community with few commercial areas, so some residents need to travel outside of the community to access employment. By identifying a small lower-income opportunity site in this area, the County can help to address the need for affordable housing in this area without siting large amounts of affordable housing in an area where jobs are less readily available.

Caruthers

The lower-income opportunity sites in the Caruthers community are in Census Tract 75 and represent approximately <u>2119</u>% of the County's capacity for lower-income units that were identified on vacant sites or in pipeline projects. This community has the highest share of lower-income unit capacity on sites or pipeline projects. One block group Block groups in this area was were identified as a high or highest moderate resource area in the 2021-2023 and 2023 TCAC opportunity areas analyses analysis, and the other was identified as a moderate resource area in both the 2021 and 2023 both were identified as high resource

areas in the 2025 TCAC opportunity areas analyses. The community was not identified as a Racially Concentrated Area of Affluence.

In this census tract, 75% of residents identify as non-white, which is similar to many areas of central, southern, and western Fresno County. The development of housing that is affordable to lower-income households in this area is therefore not expected to exacerbate any segregation conditions, as the majority of this region of the county identifies as non-white.

In 2021, the area had a moderate TCAC education score of 56 where 100 indicates the highest level of education outcomes. In TCAC's 2023 local-level analysis, this slightly increased to 57, indicating that educational outcomes are remaining stable and trending upward.

In 2023, the area had a moderate TCAC education score of 57 where 100 indicates the highest level of education outcomes. The Caruthers area scored in the lowest quartile on the Healthy Places Index and had the lowest score of any area in the county with lower-income opportunity sites at 12 out of 99. This score was driven in part by low ratings in employment and income levels, low census response rates, low access to parks and limited tree canopy, and low job density. The Caruthers area also had low environmental scores, particularly for drinking water contaminants, pesticides, and PM 2.5 levels (dust from agricultural operations). Caruthers can also be considered a disadvantaged community under SB 535, as its CES 4.0 score was higher than the 75th percentile (82.7).

The tract has a relatively low median household income at \$45,587. In comparison to other census tracts in Fresno County, this area experiences a moderate rate (24%) of households with incomes under the poverty level. However, the development of housing that is affordable to lower-income households in this area is not expected to exacerbate concentrations of poverty, as poverty in the central areas of the county tends to be at its highest concentration in central, northeast, and southern areas of the City of Fresno and its SOI, along with unincorporated areas west of the Kings River between Sanger and Reedley. In these areas, poverty rates tend to be above 30%. A moderate 16% of children live in female-headed households. Compared to other communities of the county, the area has a moderate rate of overcrowding with 17% of households experiencing overcrowding. Within the county as a whole, high rates of overcrowding tend to correlate to areas with high rates of poverty, where areas in the City of Fresno and its southern SOI area had higher concentrations of overcrowding, as do unincorporated communities along the King River between Sanger and Reedley. It had moderate levels of both renter and homeowner housing cost burden compared to the rest of the county (37% of renter households and 33% of homeowner households). By identifying lower-income opportunity sites in this area, the County can help to alleviate the high cost of housing relative to income levels for households experiencing overpayment and overcrowding. Additionally, as part of Program 33, the County will also promote a greater variety of affordable housing options by amending the Zoning Ordinance to permit duplex, triplex and fourplex housing and by promoting ADUs in the Caruthers area.

The two block groups in this <u>tract</u> with identified lower-income unit capacity on vacant sites had moderate Jobs Index ratings of 43 and 51, which may indicate a moderate number of local jobs, particularly in the field of agriculture. Caruthers is a very small community with few commercial areas, so many residents need to travel outside of the community to access employment. By identifying a moderately-sized lower-income opportunity site in this area, the County can help to address the need for affordable housing in this area without siting large amounts of affordable housing in an area where jobs are less readily available.

Clovis SOI

The lower-income opportunity sites in the Clovis sphere of influence are in Census Tracts 58.04 and represent approximately 65% of the County's capacity for lower-income housing units that was identified on vacant sites or in pipeline projects. Tract 58.04 (Tarpey Village) was identified as a high resource area in the 2021-2023 and 2023-2025 TCAC opportunity areas analyses and was not identified as a Racially Concentrated Area of Affluence.

In tract 58.04, 67% of residents identify as non-white. This is similar to many areas of central, southern, and western Fresno County, though on the lower end of what is typical for that part of the county. In the area immediately surrounding this census tract, there are a mix of predominantly white and predominantly Hispanic areas. The development of housing that is affordable to lower-income households in this area is therefore not expected to exacerbate any segregation conditions, as the majority of this region of the county identifies as non-white.

In 2021, the Clovis SOI area had a very high score for education outcomes in the TCAC analysis, scoring 91 where 100 is the highest score. In 2023, the tract had a score of score in tract 58.04 decreased slightly to 89. Tract 58.04 also had high scores HUD's Jobs Proximity Index, owing to its close proximity to job centers in and around the cities of Fresno and Clovis.

Tract 58.04 had a median household income of \$70,866, which is below the statewide median of \$87,100,. The area also has low rates of households with incomes below the poverty line, with 18% of households in tract 58.04 having incomes at that level. The development of housing affordable to lower-income households in this area is therefore not expected to create or exacerbate a concentration of poverty. A relatively small percentage of children in the area live in female-headed households, at 7% of children, and very few households experience overcrowding (1% of households). However, the area had moderate levels of housing cost burden. In this tract, 30% of renter households experienced cost burden. Similarly, 27% of homeowner households in this tract were overpaying for housing.

Tract 58.04 had moderate score of 36 on the Healthy Places Index. The lowest-scoring factors in this area were environmental, particularly levels of drinking water contaminants, ozone, and PM 2.5 levels (nearby freeway and airport pollution). This area also had a low score for its level of tree canopy, though an evaluation of the on-the-ground canopy coverage appears to be consistent with other high-scoring Clovis neighborhoods. Lower-scoring social factors were relatively low rates of residents with a bachelor's degree.

By identifying a lower-income opportunity site in this area of the Clovis community, the County can help to alleviate cost burdens for households in this area and create new affordable housing opportunities in areas with good schools and close proximity to jobs.

Riverdale

Low-income opportunity sites <u>and pipeline projects</u> in the Riverdale area are in Census Tract 77 and represent approximately 7<u>15</u>% of the County's capacity for new lower-income housing-that was identified on vacant parcels. This tract was identified as a high resource area in both the 2021-2023 and 2023-2025 TCAC analyses. In the TCAC evaluation of local education outcomes, the tract was ranked 70 in the 2021 analysis and 90 in the 2023 analysis, indicating recent improvement in positive education outcomes.

In the Healthy Places Index, the area scored in the lowest quartile, with a score in the 11th percentile. The Riverdale area experiences the same less positive scores in environmental conditions as other parts of Fresno County, including drinking water contaminants, PM 2.5 levels and ozone levels. Neighborhood and social factors that contributed to the low score included low levels of park access and tree canopy, low levels of retail density, and low employment levels. These patterns are similar to the overall patterns in the area's CES 4.0 percentile. CES considers some similar social and environmental factors to the Healthy Places Index. The area had a score in the 88th percentile and therefore is considered a Disadvantaged Community.

In this census tract, 72% of residents identify as non-white, which is similar to many areas of central, southern, and western Fresno County. The development of housing that is affordable to lower-income households in this area is therefore not expected to exacerbate any segregation conditions, as the majority of this region of the county identifies as non-white.

However, due to its distance from many employment opportunity areas, the area had a relatively low score on HUD's Jobs Index, scoring 27. However, there is an FCRTA route that connects the Riverdale area with Fresno, Caruthers, and Coalinga. Through Program 32, the County will improve coordination with Fresno County Rural Transit to maintain and/or identify new routes to healthcare facilities, employment centers and shopping outlets. This will help to avoid generating a significant cost burden to lower-income households in this area through the cost of travel to work, health care centers, and other commercial areas.

The tract that includes the area of Riverdale where lower-income opportunity sites were located did not have a median household income above the statewide median (\$50,434, compared to the statewide median of \$87,100). However, at the block group level, sites identified in Riverdale are within the higher-income area on the east side of the community. The census tract had a moderate rate of households experiencing poverty, with 23% of households in the tract having incomes under the poverty level. The development of housing that is affordable to lower-income households in this area is not expected to exacerbate concentrations of poverty, as poverty in the central areas of the county tends to be at its highest concentration central, northeast, and southern areas of the City of Fresno and its surrounding areas along with unincorporated areas west of the Kings River between Sanger and Reedley. In these areas, poverty

rates tend to be above 30%. To encourage opportunities for residents to secure higher incomes, through Program 31, the County will coordinate with partner agencies to facilitate employment opportunities in this area through several existing programs. Additionally, through program 30, the County will complete a Community Plan update for Riverdale that can help support housing affordability for lower-income households.

The area had a low rate of -children living in female-headed households (13%). The area has a moderate rate of overcrowding at 16%. The area has only moderate to low levels of cost burden, depending on tenure, as 47% of rental households and only 19% of homeowner households in the area experience housing cost burden. By identifying lower-income housing in high-resource areas such as Riverdale, the County can mitigate local housing cost burdens while also creating opportunities for lower-income households to access high-resource areas with high levels of educational outcomes.

Millerton

The mixed-income pipeline project in the Millerton area is in Census Tract 64.05 and represents approximately 10% of the County's identified capacity for new housing on vacant parcels or in pipeline projects, including 32% of the moderate-income capacity and 14% percent of the above moderate-income capacity. This tract was identified as a highest resource area in both the 2023 and 2025 TCAC analyses. In the TCAC evaluation of local education outcomes, the tract was ranked 99, just below the highest score possible, in the 2023 level analysis.

In the Healthy Places Index, the area scored in the second-lowest quartile, with a score in the 42.2 percentile. The Millerton area experiences the same less positive scores in environmental conditions as other parts of Fresno County, including drinking water contaminants and ozone levels. However, social and economic factors in this area were higher scoring than other areas in the county with opportunity sites. These patterns are similar to the overall patterns in the area's CES 4.0 percentile. CES considers some similar social and environmental factors to the Healthy Places Index. The area had a relatively positive CES ranking compared to other census tracts in the state and scored in the 10th percentile.

Though the area is unusual when compared to the central, southern, and western parts of the county for having a majority white population (28% non-white), this is more common in the north and eastern parts of the county where Millerton is located.

Though social and economic factors in this area tend to indicate higher access to opportunity and resources, the tract that includes the Millerton area did not have a median household income above the statewide median (\$73,333, compared to the statewide median of \$87,100). However, at the block group level, the median household income was \$91,486. Higher incomes are typical in the area northeast of the City of Fresno, including the Millerton area. The census tract had only 6% of households with incomes under the poverty level, and only 5% of children lived in female-headed households. No households in this census tract were experiencing overcrowding. However, the area is not without cost burden, as high costs of

housing mean that 13% of rental households and 36% of homeowner households in the area experience housing cost burden.

Due to its distance from many employment opportunity areas, the area had a relatively low score on HUD's Jobs Index, scoring 19. This may present challenges for providing affordable housing in this area, as the cost of travel to work, health care centers, and other commercial areas may mitigate the reduced cost of housing.

Though the area has some positive factors, such as positive CalEnviroScreen and TCAC education scores, Millerton was not identified as a priority area for the development of housing to accommodate lowerincome households due to its far distance from essential resources such as job centers, grocery stores, schools, medical services. No public transit is available in the Millerton community. Though the County will work to improve coordination with Fresno County Rural Transit to maintain and/or identify new routes to healthcare facilities, employment centers and shopping outlets through Program 32, the distance between Millerton and these resources, combined with the current lack of transit availability, is expected to create a transportation cost that would be a burden to lower-income households.

The development of moderate and above moderate-income housing in this area is not expected to create or exacerbate segregation or concentrations of poverty. The area is not designated as an RCAA, and a larger share of unit capacity is expected to be affordable to moderate-income households. However, as previously discussed, the median income in the Millerton CDP is much higher than in the tract as a whole, and so could be considered an RCAA. The inclusion of both moderate and above moderate-income unit capacity in this community has the potential to mitigate the existing concentration of affluence in the area.

<u>Friant</u>

The mixed-income pipeline project in the Friant community is located in Census Tract 55.15 and represents approximately 33% of the County's identified capacity for new housing on vacant parcels or in pipeline projects, including 56% of the moderate-income capacity and 86% percent of the above moderate-income capacity. This tract was identified as a highest resource area in both the 2023 and 2025 TCAC analyses. In the TCAC evaluation of local education outcomes, Friant was ranked 100, the highest score possible, in the 2023 level analysis.

In the Healthy Places Index, the Friant area scored in the second-highest quartile, with a score of 65. The Friant area experiences the same less positive scores in environmental conditions as other parts of Fresno County, including drinking water contaminants and PM 2.5 levels. However, social and economic factors in this area were higher scoring than other areas in the county with lower-income opportunity sites. These patterns are similar to the overall patterns in the area's CES 4.0 percentile. CES considers some similar social and environmental factors to the Healthy Places Index. Friant had a relatively positive CES ranking compared to other census tracts in the state and scored in the 29th percentile.

This census tract was the only tract with unit capacity in sites or pipeline projects that was designated as an RCAA. However, as previously discussed, the median income in the 1.3-square mile Friant CDP (which is directly adjacent to the Friant Ranch project) is much lower than in the tract as a whole, and the higher-income households that in the tract are broadly distributed across the remaining 23.6 square miles of rural land in the tract. Accordingly, the area is not considered, for the purposes of this sites analysis, to be an RCAA.

While the densities permitted in portions of the pipeline project could enable the County to consider some of the units as potentially affordable to lower income households, the County has opted to make conservative assumptions as there is no requirement for affordability in the proposed project. Through the implementation of Program 34, the County will make efforts to market sites in this area to developers and will facilitate multifamily development to diversify RCAAs. As part of Program 33, the County will also promote a greater variety of affordable housing options by promoting ADUs and expanding the ability to build duplex, triplex and fourplex housing in the Friant area.

Though the Friant area is unusual when compared to the central, southern, and western parts of the county for having a majority white population (36% non-white), this is more common in the north and eastern parts of the county where Friant is located.

However, due to its distance from many employment opportunity areas, the area had a relatively low score on HUD's Jobs Index, scoring 26. Through Program 32, the County will improve coordination with Fresno County Rural Transit to maintain and/or identify new routes to healthcare facilities, employment centers and shopping outlets. This will help to avoid generating a significant cost burden to lower-income households in this area through the cost of travel to work, health care centers, and other commercial areas.

Of census tracts with unit capacity on sites or pipeline projects, the tract in the Friant area had the secondhighest median household income (\$90,982) and was one of only two tracts with RHNA sites that had a median income above the statewide median. Higher incomes are typical in the area northeast of the City of Fresno, including the Friant area. The census tract had only 7% of households with incomes under the poverty level, and only 1% of children lived in female-headed households. No households in this census tract were experiencing overcrowding. However, the area is not without cost burden, as high costs of housing mean that 28% of rental households and 32% of homeowner households in the area experience housing cost burden.

Though the area has some positive factors, Friant was not identified as a priority area for the development of housing to accommodate lower-income households due to its far distance from essential resources such as job centers, grocery stores, schools, medical services. No public transit is available to connect the Friant community with Fresno. Though the County will work to improve coordination with Fresno County Rural Transit to maintain and/or identify new routes to healthcare facilities, employment centers and shopping outlets through Program 32, the distance between Friant and these resources, combined with the current

lack of transit availability, is expected to create a transportation cost that could be a burden to lower-income households.

The development of planned housing in this area is not expected to create or exacerbate segregation or concentrations of poverty. The development projected in this area is expected to accommodate a mix of moderate and above-moderate income households, which will mitigate any concentration of affluence. Additionally, according to local knowledge, Friant is a community with limited existing development that is part of a larger census tract which also includes wealthy areas of large-lot housing development. Therefore, high incomes and affluence in the tract cannot be attributed to the Friant community.

Del Rey

An affordable housing pipeline project in the Del Rey area is located in Census Tract 69 and represents approximately 15% of the County's capacity for new lower-income housing that was identified on vacant parcels or in pipeline projects. This block group where the Del Rey community is located was identified as an area of high segregation and poverty in the 2023 TCAC analysis, and designated as moderate in 2025, but was not designated an area of high segregation and poverty in 2025. In the TCAC evaluation of local education outcomes, the block group scored 52 in the 2023 analysis, indicating moderate education outcomes.

In the Healthy Places Index, the area scored in the lowest quartile, with a score in the 9th percentile. The Del Rey area experiences the same less positive scores in environmental conditions as other parts of Fresno County, including PM 2.5 levels and ozone levels. Neighborhood and social factors that contributed to the low score included low levels of park access, low levels of retail density, and low employment levels. These patterns are similar to the overall patterns in the area's CES 4.0 percentile. CES considers some similar social and environmental factors to the Healthy Places Index. The area had a score in the 89th percentile and therefore is considered a Disadvantaged Community. To invest in place-based revitalization, County will invest over \$10 million to construct 7.5 new miles of sidewalks and reconstruct 2.4 miles of sidewalks to include gutters, 120 new ADA ramps, the reconstruction of 41 ramps not up to date with ADA requirements in the disadvantaged unincorporated communities of Del Rey, Tranquillity, and Calwa by November 2030 (see Program 32).

In this census tract, 88% of residents identify as non-white, which is similar to many areas of central, southern, and western Fresno County. The development of housing that is affordable to lower-income households in this area is therefore not expected to exacerbate any segregation conditions, as the majority of this region of the county identifies as non-white.

However, due to its distance from larger employment opportunity areas in the region, the area had a moderate score on HUD's Jobs Index, scoring 52. There are a few large agricultural employers in close proximity to Del Rey, and the community is relatively near to employment opportunities in Sanger and

Parlier. There are no FCRTA routes that connect Del Rey to neighboring communities. Through Program 32, the County will improve coordination with Fresno County Rural Transit to maintain and/or identify new routes to healthcare facilities, employment centers and shopping outlets. This will help to avoid generating a significant cost burden to lower-income households in this area through the cost of travel to work, health care centers, and other commercial areas.

The tract that includes the area of Del Rey where lower-income unit capacity was identified in a pipeline project did not have a median household income above the statewide median (\$40,573, compared to the statewide median of \$87,100). The census tract had a moderately high rate of households experiencing poverty, with 33% of households in the tract having incomes under the poverty level. Though the tract is part of a region in the County with moderate to high levels of poverty, it is expected that the development of a single affordable housing project tin the area will provide affordable housing opportunities to households currently struggling with housing prices without meaningfully changing the concentration of poverty in the area. To encourage opportunities for residents to secure higher incomes, through Program 31, the County will coordinate with partner agencies to facilitate employment opportunities in this area through several existing programs. Additionally, through program 30, the County will complete a Community Plan update for Del Rey that can help support housing affordability for lower-income households.

The area had a low rate of children living in female-headed households (13%). The area has a moderate rate of overcrowding at 21%. The area has high levels of cost burden, particularly among renters, as 67% of rental households and 48% of homeowner households in the area experience housing cost burden. The development of one affordable housing project in the Del Rey community will help to mitigate these cost burdens.

Conclusion

Based upon a cumulative consideration of the above area-by-area analysis, the County determined the vacant sites inventory would not exacerbate concentrations of affluence, poverty, or segregation across the unincorporated county, and will affirmatively further fair housing by creating new housing opportunities in high-resource unincorporated communities throughout the County, with a priority on communities in close proximity to economic opportunities in Fresno and Clovis. However, the County has also identified some capacity in existing low-resource areas to address the need for additional investment in affordable housing in these areas. Additionally, the County has created a number of new programs (as referenced above and in the Action Plan) to also address fair housing challenges in several communities, such as employment opportunities, school performance, and a need for investment in transportation infrastructure and services.

Contributing Factors

Through discussions with stakeholders, fair housing advocates, and this assessment of fair housing issues, the County identified factors that contribute to fair housing issues, as shown in Table 1A-22. While there are several strategies identified to address fair housing issues, the most pressing issues are barriers to economic and educational opportunities due to the rural character of the unincorporated county and distance from urbanized areas, as well as the discrepancies in access to opportunity and rates of rental overcrowding. These discrepancies are representative of the unique characters of communities throughout the unincorporated county, but similar needs such as: a greater range of housing types, safe and affordable options, and housing at all income types to reduce concentration of lower-income households. The County generated a number of programs that will take meaningful action toward affirmatively furthering fair housing and directly address the contributing factors. The implementation steps, timelines, and quantified objectives for each of these programs are included in Section 1A-1, Action Plan. The appropriate programs are also referenced for each fair housing issue and associated contributing factors in the "Meaningful Actions" column of Table 1A-22.

AFH Identified Fair Housing Issue	Contributing Factors	Meaningful Actions
Disparities in access to services and resources	Education Limited school facilities, lower scoring school performance, and limited access to vocational training in unincorporated communities Employment	Program 14: Adequate Sites Program 17: Affordable Housing Incentives Program 30: Access to Education Program 31: Access to Employment Program 17: Affordable Housing Incentions
	Lower populations in unincorporated communities makes it difficult to attract and support a large number and variety of job opportunities Agricultural jobs, which are more frequently available in rural areas, may have lower incomes than jobs found in urban areas Distance from cities and major transit services can create a barrier for unincorporated residents to know about, generate skills for, and obtain access to jobs	Housing Incentives Program 31: Access to Employment Program 32: Improving Accessibility and Safety on Roads and Streets
	Infrastructure and Services Lower density and size of unincorporated communities (that are not adjacent to cities) makes it difficult to fund and provide public infrastructure and public services	Program 5: Access and Transforming Health Program 16: Coordination of Infrastructure and Services <u>Program 17: Affordable</u> <u>Housing Incentives</u>

Table 1A-22: Factors Contributing to Fair Housing Issues

AFH Identified Fair Housing Issue	Contributing Factors	Meaningful Actions
	Environmental Conditions Historical and current presence of agricultural industries and chemical and waste storage outside of urban areas in unincorporated areas, leading to greater risks of exposure associated with pesticides, groundwater threats, and solid waste facilities	Program 5: Access and Transforming Health Program 16: Coordination of Infrastructure and Services <u>Program 17: Affordable</u> <u>Housing Incentives</u> <i>Programs from other</i> <i>General Plan Elements¹</i> Program EJ-A.C The County, in coordination with the SJVAPCD, shall develop a list of pollution reducing technologies and best practices to make available to the local commercial and industrial industry. Program EJ-A.D. The County shall seek funding from the San Joaquin Valley Air Pollution Control District and the CalEPA to establish a Healthy Homes HVAC retrofitting subsidy program.
Overcrowding for rental households and farmworkers	Limited range of housing types available; predominantly single-family housing Rates of rental overcrowding seem to vary by community and by year; communities that are currently impacted (2020) include Caruthers, Del Rey, Riverdale Need for family housing and access to amenities, especially for farmworkers (who when surveyed, overwhelmingly preferred to live away from work) High rates of poverty and persons of color among farmworker populations	Program 20: Zoning Ordinance Amendments Program 33: Improve Housing Options Program 34: RCAA Program 35: Housing for Farmworkers
Presence of RCAAs	Proximity to more and higher paying job opportunities in incorporated cities of Clovis and Fresno	Program 14: Adequate Sites Program 34: RCAA
Housing in need of repairs and rehabilitation	A lack of maintenance and upkeep due in part to lower household incomes Communities that demonstrate the greatest need include Calwa, Cantua Creek, Lanare, Laton, Mayfair, and Squaw Valley Windows and siding most common repair needs	Program 7: Room and Board Support and Tech Assistance Program 18: Extremely Low- Income Households Program 23: Housing Pres and Rehabilitation

Table 1A-22: Factors	Contributing to	Fair Housing Issues

Note 1: 2024 General Plan, Part 3 (Administration and Implementation).

SECTION 1A-4: CONSTRAINTS

Land Use Controls General Plan Designations and Zoning Districts

Analysis

The County of Fresno General Plan contains a number of land use designations that are implemented by zoning districts to support and facilitate residential development. The following table illustrates the type and intensity of residential development allowed through the County's General Plan and Zoning maps and documents. The Agricultural and Resource categories, which permit residential in a more ancillary fashion at densities of one unit per 20 or 40 acres, are not listed below.

In addition to the range of residential units that are allowed in the designations outlined in the table, the County allows planned unit developments (PUDs) in areas designated as residential. A PUD 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. A PUD may be located in any area designated and zoned for residential use upon the granting of a use permit in accordance with the provisions of the Zoning Ordinance.

General Plan Land Use Category (min–max du/ac)	Implementing Zoning Districts (max du/ac)	Description of Purpose and Typical Uses		
Rural Residential (0.2–0.5)	R-R, Rural Residential (0.5)	Single family dwellings, accessory buildings, and small agricultural operations in rural settings		
Rural Settlement Area (0.5–1.0)	R-R, Rural Residential (0.5) R-A, Single Family Residential Agric. (1.2) R-1-E/-EH, Single Family Residential (1.1) RCC, Rural Commercial Center (1)	Non-urban community in rural areas designated for residential and commercial uses serving the rural settlement and surrounding farm population		
Planned Rural Community (1.0 to 2.0)	R-R, Rural Residential (0.5) R-1-A/-AH/-E/-EH, Single Family Res. (2.1)	Variety of housing types in a semi- rural environment with public services and locally oriented commercial uses		
Foothill Residential (0.2–0.5)	R-R, Rural Residential (0.5)	Single family dwellings, accessory buildings, and small agricultural operations in rural settings in the Sierra Foothills		
Low-Density Residential (0.9–2.8)	R-1-A/-AH/-B/-E/-EH, Single Family Res. (3.4)	Single family dwellings alongside open space in a suburban setting		
Medium-Density Residential (2.8–5.8)	R-1, R-1-B, R-1-C, Single Family Res. (7.2)	Single family and low-density multi-family dwellings in a suburban setting		

Table 1A-23: General Plan and Zoning Categories

General Plan Land Use Category (min–max du/ac)	Implementing Zoning Districts (max du/ac)	Description of Purpose and Typical Uses
Medium High-Density Residential (5.8–23)	R-1, Single Family Residential (7.2) R-2/-2A, Low Density Multi-family Res. (20) R-3/-3A, Medium Density Multi-family Res. (29) T-P, Trailer Park (18)	Single family and all types of multi-family dwellings in a suburban setting
Mountain Residential (0.2–14.5)	R-R, Rural Residential (0.5) All Single Family Residential (7.2) R-2/-2A, Multi-family Residential (20) T-P, Trailer Park (18)	Recreation-oriented residential development including: single- family dwellings, multi-family dwellings, mobile homes, and accessory structures
Mountain Urban (0.2–14.5)	R-R, Rural Residential (0.5) R-1, Single Family Residential (7.2) R-2/-2A, Multi-family Residential (20) T-P, Trailer Park (18)	Concentrations of residential development, various intensities of commercial activities, industrial uses where appropriate, and foothill rural residential
Neighborhood Commercial (5.8–16)	C-1, Neighborhood Shopping Center (20) T-P, Trailer Park (18)	A range of commercial uses serving the daily needs of neighborhood residents; can include mixed-use development
Community Commercial (5.8-16)	C-2, Community Shopping Center (20) C-3, Regional Shopping Center (20) T-P, Trailer Park (18)	A range of commercial uses serving the daily needs of residents throughout the local and surrounding community; can include mixed-use development
Office Commercial (5.8–14.5)	 R-P, Residential and Prof. Office (20) C-P, Admin. and Prof. Office (18.1) R-2/-2A, Multi-family Residential (20) T-P, Trailer Park (18) 	Concentration of office, medical, commercial, and multi-family development
Central Business Commercial (5.8 to 16)	C-4 Central Trading (20) C-6 General Commercial (18.1) R-2/-2A, Low Density Multi-family Res. (20) T-P, Trailer Park (18)	Wide range of commercial, office, governmental, hotel, and mixed- use residential concentrated into a central location

Table 1A-23: General Plan and Zoning Categories

Note: General Plan densities are gross, which convert to net densities for Zoning using an 80% conversion factor. The R-3A zone will be removed per Program 33.

Sources: County of Fresno General Plan and Zoning Ordinance, as amended in 2020 and per the 2024 General Plan.

The County generally receives requests to develop residential projects at densities that are toward the midrange or top end of what is permitted by the zoning. Within the past five years the County was approached by a developer in the Shaver Lake area to develop a tentative tract for a residential subdivision to a lower density than originally approved but was advised such modification would need an amendment to the specific plan and a new tentative tract map. The County generally does not have a minimum density for development. Availability of infrastructure often determines limits to density and build-out. Current trends (see unincorporated projects in Table 1A-7), indicate that projects with higher density zoning are seeing densities that are toward the upper end of the density range and some recent applications demonstrate interest very close to the upper end of the density range.

Conclusion

The County offers numerous general plan land use designations and zoning districts that permit a wide range of housing densities throughout the unincorporated county. The densities are sufficiently high to allow the development of housing for all income levels, including densities that meet or exceed the state's default density thresholds.

Recommended Action

None required.

Residential Development Standards

Analysis

Tables 1A-24 through 1A-26 list and describe the development standards for each zoning district in the County of Fresno that allows new residential development. These development standards are typical and either consistent with or more flexible compared to standards in cities. Consistent with Government Code Section 65940.1(a)(1) related to transparency requirements, zoning, and development standards for all parcels in the county are available on the County's website.

The R-2A and R-3A districts contain the "-A" suffix to apply to areas, primarily in older Community Plans, where existing development is predominantly or exclusively one story. To enhance combability, the R-2A and R-3A districts only allow buildings to reach 20 feet. However, development in these districts is still permitted to reach their corresponding maximum density (which remains achievable, even when limited to one story as illustrated later in the analysis of the cumulative impact of development standards). The County, as part of Program 33, will amend its Zoning Ordinance to allow two-story buildings and increase maximum height to 25 feet, which will facilitate larger units and alleviate the potential constraint of a single-story limitation.

Development Standard	Zoning District										
	R-A	R-R	R-1-A/ R-1-AH	R-1-B	R-1-C	R-1-E/ R-1-EH	R-1	R-2/ R-2A	R-3/ R-3A		
Min Parcel Size	36K sf	2 ac	20K sf	12.5K sf	9K sf	37.5K sf	6K sf	6.6K sf	7.5K sf		
Density Max	1.2 du/ac	0.5 du/ac	2.1 du/ac	3.4 du/ac	4.8 du/ac	1.1 du/ac	7.2 du/ac	20.0 du/ac*	29.0 du/ac		
Min Parcel Width	130 ft.	165ft.	110 ft.	80 ft.	70 ft.	150 ft.	60 ft.	60 ft.	60 ft.		
Max Parcel Coverage	30%	None	30%	35%	40%	30%	40%	50%	50%		

Table 1A-24: Development Standards for Residential Zones

Min Setbacks									
Front	35 ft	35 ft	35 ft	35 ft	25 ft	50 ft	20 ft	20 ft	15 ft
Side	15 ft	20 ft	10 ft	10 ft	7 ft	15 ft	5 ft	5 ft	5 ft
Rear	20 ft	15 ft							
Max Height	35 ft	25 ft	35/20 ft	40/20 ft					

Zones: R-A Single Family Residential Agricultural; R-R Rural Residential; R-1-A/-AH/-B/-E/-EH Single Family Residential, Low Density; R-1/-1-C Single Family Residential, Medium Density; R-2/-2A Multi-family Low Density; R-3/-3A Multi-family Medium Density (note that the R-3A zone will be removed per Program 33).

Abbreviations (units): sf = square feet; ac = acre(s), du = dwelling unit, ft = feet.

*Parcels of less than 4,000 square feet may have no more than one dwelling unit. Parcels between 4,000 square feet and 6,600 square feet may have no more than two dwelling units.

Source: County of Fresno Zoning Ordinance, 2023.

Development		Zoning District										
Development Standard	C-P, C-1/2/3	C-4	C-6	R-P	RCC	AE	AL	R-C	R-E	RS		
Min Parcel Size	6.6K sf	None	None	7.5K sf	2 ac	2 to 160 ac	20 to 40 ac	Varies	2 ac	36K sf to 2 ac		
Density Max	20 du/ac	20 du/ac	18 du/ac	18 du/ac	1 du/ 2 ac	1 du/ 20 ac	1 du/ 20 ac	1 du/ parcel	1 du/ 2 ac	1 du/ lot		
Min Lot Width	60 ft.	None	None	65 ft	165 ft	None	None	None	165 ft	165 ft		
Max Parcel Coverage	50%	None	None	50%	30%	None	None	1-10%	50%	30%		
Min Setbacks Front Side Rear	20 ft 5 ft 20 ft	0-10 ft 0-10 ft 0-10 ft	0-10 ft 0-10 ft 0-10 ft	15 ft 10 ft 10 ft	10 ft /varies 0-20 ft 0-20 ft	35 ft 20 ft 20 ft	35 ft 10 ft 20 ft					
Max Height	35 ft	75 ft	35 ft	20 ft	35 ft	35 ft	35 ft	35 ft	25 ft	35 ft		

Table 1A-25: Development Standards for Residential in Non-Residential Zones

Zones: C-P Administrative and Professional Office; C-1 Neighborhood Shopping Center; C-2 Community Shopping Center; C-3 Regional Shopping Center; C-4 Central Trading; C-6 General Commercial; R-P Residential and Professional Office; RCC Rural Commercial Center; AE Exclusive Agricultural; AL Limited Agriculture; R-C Resource Conservation; R-E Recreational; RS Rural Settlement. Abbreviations (units): sf = square feet; ac = acre(s), du = dwelling unit, ft = feet.

Source: County of Fresno Zoning Ordinance, 2023.

Development Standards	Specific Requirements
Min Parcel Size	3 acres
Density Max	18 dwelling units per acre
Min Parcel Width	110 feet
Min Setback Requirements	
Front	15 feet

Table 1A-26: T-P Zone Development Standards

Side	5 feet
Rear (may be used for parking)	10 feet
Trailer Space Area	Minimum of 1,500 square feet.
Trailer Space Area	Nonconforming trailer space shall have a min. area of 1,000 square feet.
Min Trailer Space Width	30 feet
Distance between units on same parcel	10 Feet
Max Height	35 feet
Parking	1 parking space per trailer space plus 1 space for each 10 trailer spaces (or fraction thereof) for guest parking

Source: County of Fresno Zoning Ordinance, 2023.

Parking Requirements

Table 1A-27 lists residential parking requirements in the County, which vary by housing type. Parking requirements are inclusive of spaces for residents, guests, and those designated for disabled individuals.

In response to concerns and evidence of parking requirements being a constraint for the development of emergency homeless shelters, state law recently changed prohibiting a jurisdiction from requiring more parking spaces for an emergency shelter compared to other residential and commercial uses. The County maintains parking requirements with the intent of adequately serving the facilities without hindering development potential. In accordance with legislation enacted through Assembly Bill 139, the County evaluated its parking requirements for emergency shelters and determined that the parking requirements are lower than those for single-family and multi-family housing and comparable or lower than similar uses such as hotels, motels, residential care facilities, and group residential such as a boarding house.

The County currently requires one space for each staff member plus one space for each ten occupants in an emergency shelter and one space for every unit in a multifamily residential development. Assuming one person per bed, a shelter providing 60 beds (maximum allowed) would require six parking spaces, plus a parking space for an average of 11 staff, for a total of 17 parking spaces. Assuming an average household size of three occupants, 20 multifamily units (total population of 60) would require a total of 20 parking spaces. A small emergency shelter with 10 beds at four beds per room would need three parking spaces.

Residential Care facilities currently require 1 space for each 400 sq. ft. of gross floor area, plus 1 space for every 3 employees. Depending on the building size and population served, this formula may result in a larger parking requirement than a comparably-sized multifamily building. As part of Program 33, the County will evaluate whether how parking processes standards create a constraint to the development of residential care facilities that serve seven or more residents, based on timing, cost, and approval certainty. This evaluation will-includinge soliciting feedback from developers of residential care facilities. If the County determines that the requirement is a constraint, tThe County will amend the Zoning Ordinance as needed to ensure parking standards are appropriate and do not serve as a constraint.

Use	Parking Requirement
Single-Family Dwelling	2 spaces, one of which shall be covered on the same site with the primary structure
Multi-Family Dwelling	1 space for each unit
Mobile Home Park	1 space for each mobile home space and 1 guest space for every 10 mobile home spaces, or fraction thereof
Second Dwelling Unit	1 space per unit in residential zones; 2 spaces, covered or uncovered, for unit in agricultural zones
Accessory Dwelling Unit	1 space for each attached and detached accessory dwelling unit in addition to the parking required for the existing residence on the property. The space may be provided as tandem parking. For ADUs built in converted spaces, no additional off-street parking is required.
Residential Care Facility (≤6 persons)	Treated as single-family dwelling
Residential Care Facility (7+ persons)	1 space for each 400 sq. ft. of GFA, plus 1 space for every 3 employees
Emergency Shelter	1 space for each staff member plus one space for each ten occupants
Farmworker Housing Complex, Individual Units (≤ 12 units)	1 space for each unit
Farmworker Housing Complex, Dormitory Beds (≤ 36 beds)	1 space per bed

Table 1A-27: Fresno County Parking Requirements

Source: County of Fresno Zoning Ordinance, 2023.

Open Space and Park Requirements

The County's Zoning Ordinance does not prescribe requirements for residential development related to the provision of open space and parks (land dedication or fees).

Conclusion

The County's development standards are reasonable and less onerous compared to those typically required in cities, and do not serve to constrain housing development.

Recommended Action

None required.

Growth Management

Analysis

All jurisdictions in Fresno County, with the exception of the City of Fresno, are subject to the City-County memorandum of understanding (MOU). The MOU is an agreement establishing procedures for annexation, and also outlines the distribution of property and sales taxes between the cities and Fresno County. The City-County MOU encourages urban development to take place within cities where urban services and facilities are available in order to reduce sprawl. The standards for annexation included in the MOU require that between 25% and 50% of proposed annexation areas, depending on jurisdiction, have an approved land

use entitlement (tentative subdivision map for residential or approved land use application for nonresidential). Therefore, annexation requests are primarily triggered by private developers who are interested in developing certain parcels. Upon the implementation of Program 2, the MOU will also include a RHNA transfer agreement, reflecting that nearly all unincorporated land is annexed into cities prior to development.

Conclusion

This policy diverts urban development to incorporated cities where more services and facilities are available to residents. This approach is consistent with the RHNA distribution methodology prepared by the Fresno Council of Governments.

Recommended Action

This is a cooperative agreement to be updated as part of Program 2.

Density Bonus

Analysis

The County Zoning Ordinance implements state law requirements to grant density bonuses for residential developments providing moderate- and lower-income housing.

Conclusion

While the County has in its Zoning Ordinance a density bonus that otherwise complies with State law, as part of Program 20 the County will amend its Ordinance to include additional language to reflect AB 2694 signed by the Governor on September 19, 2024. The County will also amend its permitted uses tables to correct a clerical error and remove "Density Bonus" as a use in order to clarify that the density bonus is permitted in every zone where residential uses are permitted.

Recommended Action

None required.

Zoning for a Variety of Housing Types

Analysis

The Fresno County Zoning Ordinance regulates residential development in the unincorporated county. Table 1A-28 and Table 1A-29 summarize the housing types that are permitted by right and conditionally permitted. Following the tables is a description of the County's requirements for various housing types.

		Zoning District									
Residential Use	R-A	R-R	R-1-A/ R-1-AH	R-1-B	R-1-C	R-1-E/ R-1-EH	R-1	R-2/ R-2A	R-3/ R-3A		
Single-Family Dwellings	Р	Р	Р	Р	Р	Р	Р	Р	Р		
Manufactured Housing	Р	Р	Р	Р	Р	Р	Р	Р	Р		
Multi-family Dwellings ¹	NP	NP	NP	NP	NP	NP	NP	Р	Р		
Employee Housing (≤6)	Р	Р	Р	Р	Р	Р	Р	Р	Р		
Farmworker/Employee Housing	Р	Р	С	NP	NP	С	NP	NP	NP		
Accessory Dwelling Unit	Р	Р	Р	Р	Р	Р	Р	Р	Р		
Second Dwelling Unit ²	D	D	D	D	D	D	D	NP	NP		
Residential Care Home (≤6 persons)	Р	Р	Р	Р	Р	Р	Р	Р	Р		
Residential Care Facility (7+ persons) ³	C	С	С	С	С	С	С	С	С		
Low-Barrier Navigation Center	Р	Р	Р	Р	Р	Р	Р	Р	Р		
Emergency Shelter	NP	NP	NP	NP	NP	NP	NP	NP	NP		
Transitional Housing	Р	Р	Р	Р	Р	Р	Р	Р	Р		
Supportive Housing	Р	Р	Р	Р	Р	Р	Р	Р	Р		
Single Room Occupancy (Small)	NP	NP	NP	NP	NP	NP	NP	Р	Р		
Single Room Occupancy (Large)	NP	NP	NP	NP	NP	NP	NP	С	С		

Table 1A-28: Use Regulations for Residential Zones

Zones: R-A Single Family Residential Agricultural; R-R Rural Residential; R-1-A/-AH/-B/-E/-EH Single Family Residential, Low Density; R-1/-1-C Single Family Residential, Medium Density; R-2/-2A Multi-family Low Density; R-3/-3A Multi-family Medium Density (note that the R-3A zone will be removed per Program 33).

Abbreviations (permitting regulations): P = permitted by right; D = Director review and approval; C = conditional use permit; NP = not permitted.

Notes:

1. Through the implementation of Program 33, the County will update the Zoning Ordinance to expand where duplex, triplex, and fourplex dwellings are (conceptually expanding options in one or more of the following Community Plan areas: Biola, Caruthers, Del Rey, Easton, Friant, Lanare, Laton, Malaga, Riverdale, and Tranquillity).

2. Second dwelling units are distinct from accessory dwelling units in that they are second primary residences rather than smaller accessory units.

3. Through Program 33, the County will amend its Zoning Ordinance to clarify that such facilities are permitted with a CUP. *Source: County of Fresno Zoning Ordinance, 2023.*

Residential Use	Zoning Designation							
Kesiuentiai Use	C-P	C-1	C-2	C-3	C-4	C-6	R-P	С-М
Single-Family Dwellings ¹	NP	NP	NP	NP	NP	NP	Р	NP
Manufactured Housing ¹	NP	NP	NP	NP	NP	NP	Р	NP
Multi-family Dwellings ¹	Р	NP	NP	NP	Р	С	Р	NP
Mixed Use Residential	NP	С	С	С	С	С	С	NP
Employee Housing (≤6)	NP	NP	NP	NP	NP	NP	Р	NP

Table 1A-29: Use Regulations for Non-residential Zones

Decidential Har	Zoning Designation							
Residential Use	C-P	C-1	C-2	C-3	C-4	C-6	R-P	С-М
Farmworker/Employee Housing	NP	NP	NP	NP	NP	NP	NP	NP
Accessory Dwelling Unit ²	Р	Р	Р	Р	Р	Р	Р	NP
Second Dwelling Unit ³	NP	NP	NP	NP	NP	NP	NP	NP
Residential Care Home/Facility (>7) ⁴	NP	NP	NP	NP	NP	NP	NP	NP
Low-Barrier Navigation Center	Р	NP	NP	NP	Р	NP	Р	NP
Emergency Shelter	NP	NP	NP	NP	Р	NP	NP	Р
Transitional Housing	NP	NP	NP	NP	NP	С	Р	NP
Supportive Housing ⁵	Р	NP	NP	NP	Р	NP	Р	NP
Single Room Occupancy (Small)	NP	NP	NP	NP	Р	NP	NP	NP
Single Room Occupancy (Large)	NP	NP	NP	NP	С	NP	NP	NP

Table 1A-29: Use Regulations for Non-residential Zones

Zones: C-P Administrative and Professional Office; C-1 Neighborhood Shopping Center; C-2 Community Shopping Center; C-3 Regional Shopping Center; C-4 Central Trading; C-6 General Commercial; R-P Residential and Professional Office; C-M Commercial and Light Manufacturing. Abbreviations (permitting regulations): P = permitted by right; D = Director review and approval; C = conditional use permit; NP = not permitted.

Notes: 1. Recent legislation enacted (signed into law in September 2022) through Senate Bill 6 (SB 6) and Assembly Bill 2011 (AB 2011), residential development shall be permitted on property zoned for commercial (office or retail) use through the year 2033. Under the provisions of SB 6, the County can require discretionary review while under the provisions of AB 2011, the County must allow residential by right. However, under the provisions of AB 2011, there are additional requirements for parcel location and affordability in order to qualify for by right ministerial review. 2. Second dwelling units are distinct from accessory dwelling units in that they are second primary residences rather than smaller accessory units.

3. Through Program 20, the County will amend the Zoning Ordinance to clarify that accessory dwelling units are permitted in a ministerial manner in any zone that permits single-, multi-, or mixed-use residential.

4. Residential care facilities serving fewer than seven residents shall be considered a single-family use.

5. Through Program 20, the County will amend the Zoning Ordinance to clarify that supportive housing is permitted in a ministerial manner in any nonresidential or mixed-use zone that permits multi-family residential.

Source: County of Fresno Zoning Ordinance, 2023.

Multifamily

Multifamily dwellings are permitted by right in the R-2, R-3, C-4, and R-P zones. A CUP is required for multifamily in the C-6 zone. Through the implementation of Program 33, the County will update the Zoning Ordinance to expand where duplex, triplex, and fourplex dwellings are permitted (conceptually expanding options in one or more of the following Community Plan areas: Biola, Caruthers, Del Rey, Easton, Friant, Lanare, Laton, Malaga, Riverdale, and Tranquillity).

Manufactured Housing

The County permits manufactured housing in all residential districts where single-family dwellings are permitted by right, as well as the T-P (Trailer Park) zone.

Farmworker/Employee Housing

Currently, the Zoning Ordinance contains provisions for farmworker housing that are consistent with the Employee Housing Act. Employee housing for six or fewer residents is permitted in all zones that allow single-family housing. The County permits agricultural uses in all of its agricultural zones. Limited farming is allowed to occur in a small number of residential zones as an interim use until the land is developed to a residential use. In 2024, the County amended the Zoning Ordinance to permit farmworker housing complexes consisting of up to thirty-six (36) beds in a group quarter or up to twelve units or spaces designed for use by a single-family or household within agricultural zones. The update additionally permitted these in the R-1-A, R-1-AH, R-1-E, and R-1-EH with a conditional use permit to allow them to be developed alongside interim agricultural uses in residentially zoned areas.

Emergency Shelters

In accordance with AB 2339 (2022), the Housing Element must identify potential sites for emergency shelters in a zoning district that permits residential uses. Emergency shelters are permitted by right in C-4 zone and C-M zones. The C-4 permits multi-family residential uses, supportive housing, and accessory dwelling units by-right.

The 2022 Point-in-Time (PIT) count estimated that there were 541 sheltered and unsheltered homeless individuals within Fresno County but outside of the City of Fresno. The 2022 PIT collected data throughout the county, but experienced equipment calibration issues related to documentation of exact location (i.e., accuracy only to zip codes). The 2023 PIT count estimated that there were 605 sheltered and unsheltered homeless individuals within Fresno County but outside of the City of Fresno, which is an increase of 11.8% compared to the 2022 PIT count. Of the 605, all but 11 were unsheltered.

Additional data was obtained from the 2023 PIT count by zip code. Zip code data offers greater levels of geographic accuracy but can intermingle incorporated and unincorporated areas. Accordingly, the County evaluated the raw data and applied three methodologies to derive estimates for unincorporated county from the 2023 PIT counts.

After excluding the City of Fresno, which is identified separately by the PIT count, the first approach applies the unincorporated county's proportion of population compared to the total countywide population. The unincorporated population represents 35% of the countywide population (excluding the City of Fresno). Applying this percentage to the 605 total would indicate there may be an estimated 210 community members who are experiencing homelessness in unincorporated parts of the county. This figure is likely too large as there is no evidence that the rate of homelessness is directly tied to population size and the vast majority of unhoused individuals tend to congregate near services in cities.

The second approach compares overlapping boundaries of zip codes and unincorporated communities to arrive at an estimate of between 138 and 152 community members that were unhoused and unsheltered.

APPENDIX 1A: COUNTY OF FRESNO

However, a portion of the area with some zip codes also includes areas within incorporated boundaries; therefore, not all individuals were likely counted in or attributable to unincorporated areas.

The third approach uses the 2023 PIT's attempt to interpolate the number of unhoused and unsheltered individuals specifically for unincorporated communities. The 2023 PIT identified a total of 17 individuals that were physically counted in the unincorporated communities of Caruthers (6), Del Rey (1), Raisin City (5), and Riverdale (5). The 2023 PIT estimated (using HUD's methodology) an additional 45 individuals in the following 13 unincorporated communities: Auberry (6), Biola (3), Cantua Creek (2), Five Points (2), Friant (5), Helm (1), Hume (1), Laton (6), Prather (4), Shaver Lake (1), Squaw Valley (8), Tollhouse (4), and Tranquillity (2). This approach calculates an estimated total of 62 homeless individuals that were unhoused and unsheltered.

To be conservative, the County calculated potential capacity for emergency shelters using an average of all three 2023 figures (141). Based on direction in state law, which requires capacity based on 200 square feet of site space per unhoused individual, two-thirds of an acre (0.66 acre) of land would be required for the 141 individuals. However, the unhoused community members are likely living throughout the unincorporated county and are unable and unlikely to gather in one single community given the size of and patterns of resource distribution in Fresno County.

Accordingly, the County identified parcels in the eastern and western parts of the county that are vacant, appropriately zoned, of sufficient size, and near amenities and services that serve people experiencing homelessness. Table 1A-30 lists the parcels that are zoned C-4 that could be developed with an emergency shelter by right. The C-4 district allows 20 residential units per acre and the County permits a number of beds equal to three times the maximum allowable residential unit density, which means that up to 60 beds per shelter are permitted on parcels zoned C-4. As shown in Table 1A-29, the County has identified enough sites for more than 141 beds. All sites could accommodate a shelter within a single-story building and meet all development standards. Accordingly, the County there is sufficient developable capacity for the estimated need in the unincorporated county.

APN	Zone	Acres	Beds ¹	Notes on Location
04310355S	C-4	0.34	21	Caruthers area. Within 500 to 1,000 feet of a supermarket, a dollar store, and the Caruthers Branch Library.
18528038	C-4	0.93	56	Squaw Valley area. Located on Highway 180, and less than half of a mile to a dollar store and the Bear Mountain Library.
05331307	C-4	0.43	26	Riverdale area. Within a quarter mile of a WIC office and health center. Down the street from a dollar store and within one mile of a supermarket.
05331318	C-4	0.46	28	Riverdale area. Within a quarter mile of a WIC office and health center. Down the street from a dollar store and within one mile of a supermarket.
49404208	C-4	0.79	47	Fresno SOI. Within a half mile of food market and fast-food restaurants. Partial parcel that is currently for sale. Within 500 feet of a bus stop for Route 45 of Fresno Area Express.
	Total	2.16	178	

Table 1A-30: Potential Emergency Shelter Sites

Note: 1. Based on permitted density of 60 beds per acre in C-4 Zone. Source: Fresno County, 2023

Recent state law (AB 2339) expands the definition of "emergency shelters" to include other interim interventions, including but not limited to, navigation centers, bridge housing, and respite or recuperative care. As part of Program 20 the County will revise the definition in the Zoning Ordinance accordingly.

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

Low-Barrier Navigation Centers are currently permitted by-right in the R-2, R-2A, C-P, C-4, and R-P zones. As part of Program 20 the County will amend the Zoning Ordinance to residential zones, zones allowing mixed-uses, and all nonresidential zones allowing multifamily residential.

Transitional and Supportive Housing

The County permits supportive housing in all residential zones allowing single-family or multi-family residential uses, and through Program 20 will commit to amending the Zoning Ordinance to permit supportive housing in mixed-use and nonresidential zones that permit these residential uses, including the C-1, C-2, C-3, and C-6 zones, to comply with Government Code 65651. Transitional housing is permitted by-right in all residential zones that allow single-family uses. Transitional housing is also permitted in the C-6 and R-P zone using the same review process as a single-family or multi-family use in the same zone. Through Program 20, the County will commit to amending the code to permit transitional housing in the C-P, C-1, C-2, C-3, C-4, and C-6 zones subject to same review processes as a single-family or multi-family or multi-family use in the same zone, including mixed uses.

The municipal code defines "transitional housing" as:

"Buildings configured as rental housing developments, but operated under program requirements that require the termination of assistance and recirculation of the assistive unit to another eligible program recipient at a predetermined future point in time that shall be no less than six months from the beginning of assistance. Transitional housing units are residential uses subject to those requirements and restrictions that apply to other residential uses of the same type in the same zone. For those districts in which residential uses are permitted only with approval of a discretionary land use permit, such approval must be obtained to permit the establishment of transitional housing."

Furthermore, "supportive housing" is defined as:

"Housing with no limit on length of stay, that is occupied by the target population as defined in Government Code Section 65650 and that is linked to on- site or off-site services that assist the supportive housing resident in retaining the housing, improving his/her health status, and maximizing his/her ability to live, and when possible, work in the community. Supportive housing units are residential uses subject to those requirements and restrictions that apply to other residential uses of the same type in the same zone and must meet the underlying zoning district's development standards, including density. For those districts in which residential uses are permitted only with approval of a discretionary land use permit, such a permit must be obtained to permit the establishment of supportive housing."

Single Room Occupancy (SRO) 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 units in SRO buildings to range in size from 150 to 400 square feet, including a closet and exterior security lighting. Bathroom, kitchen, and clothes cleaning facilities can be provided within each unit or as common areas. These standards enable units within an SRO building to be rented at much lower rates that can be affordable to extremely low-income households. It should be noted that SRO units are distinct from residential care facilities; e.g., SRO buildings are not state-licensed and do not provide care services such as health care, assistance with personal care activities, or meals. The Zoning Ordinance permits small SRO buildings (those containing six or fewer units) by right in the R-2, R-3, and C-4 zones. Larger SRO buildings with seven or more units are permitted with a conditional use permit in the R-2, R-3, and C-4 zones. Through the implementation of Program 20, the County will streamline the process so that all SRO projects (regardless of size) a permitted through an administrative (non-discretionary) approval process, subject only to a Site Plan Review requirement.

Residential Care Homes/Facilities

The Zoning Ordinance permits group housing for six or fewer persons by right in all zones that allow singlefamily uses by right. A residential care home serving six or fewer individuals is considered to meet the Zoning Ordinance requirements of a single-family dwelling in the same zone district. Residential care facilities of seven or more residents are permitted subject to a conditional use permit in residential zones. Residential care homes/facilities for any number of residents are also permitted by right in the C-1, C-2, C-3, C-4, C-6, and R-P zones. Residential care facilities for seven or more are also subject to the population density standards of rest homes, which allows for one person above six for each one-quarter increment of parcel area exceeding the minimum parcel size. This calculation excludes any member of the operator's family or people employed as facility staff.

Roughly five percent of the housing stock in the unincorporated county is multi-family (see Table 2-15 in Section 2) due to the low population levels and lack of infrastructure present outside of cities. Accordingly, there is a 95% chance (or higher) that a residential care facility for seven or more would be proposed in a single-family structure. Nearly all of the housing units in unincorporated areas contain six or fewer rooms (excluding kitchens and bathrooms), with three or four of these rooms serving as bedrooms. The state's overcrowding threshold starts at 1.01 persons per room and severe overcrowding is defined as 1.50 persons per room. If residential care facilities for seven or more were treated as any other residential use, seven occupants would be considered to live in overcrowded conditions in a six-room housing unit, with severe overcrowding occurring at nine occupants (even when excluding the operator, the operator's family, and any staff).

As part of Program 33, the County will evaluate whether how the conditional use permit process is a constraint to the development of residential care facilities that serve seven or more residents based on timing, cost, and approval certainty, and will amend the permitting process and/or parking standards if the County determines that either is a constraint to be appropriate and ensure they do not serve as a constraint. Additionally, the county will remove unnecessary and non-objective standards for residential care homes for seven or more, including consideration to amend the population density requirement for unlicensed care facilities, while balancing the desire to avoid overcrowded conditions.

Accessory Dwelling Units

Accessory dwelling units (ADUs) and junior accessory dwelling units (JADUs) are permitted by right in all zones allowing residential or mixed uses. Owner-occupancy is currently required for JADUs only in cases where both an ADU and JADU are included on the same parcel. As part of Program 20, the County will clarify definitions of accessory dwelling units and second dwelling units. The County will also remove owner-occupancy requirements on ADUs until 2025, and reflect changes to state law as enacted through SB 1211 (chaptered September 2024).

Second Dwelling Units

Second dwelling units are distinct from accessory dwelling units in that they are larger, primary dwelling units. Second dwelling units are subject to the Director's Approval process, and the Zoning Ordinance allows one secondary dwelling unit per lot in nine residential zones: RR, RA, R-1, R-1-B, R-1-C, R-1-A/R-1-AH, and R-1-E/R-1- EH. These units have an owner-occupancy requirement and may not be conveyed separately from the first dwelling unit.

Farmworker and Employee Housing

The Zoning Ordinance contains provisions that allow for farmworker and employee housing for six or fewer families in all residential districts, in compliance with state law requirements. In its Zoning Ordinance the County defines employee housing and farmworker housing complexes as follows:

- Employee/farmworker housing. Employee Housing providing accommodations for six or fewer employees shall be deemed a single-family structure and a residential use of the property by a single household per the requirements of Section 17021.5 of the California Health and Safety Code.
- Employee/farmworker housing complexes. Employee housing for employees and their households consisting of up to thirty-six (36) beds in a group quarters or up to twelve (12) units or spaces designed for use by a single family or household shall be allowed subject to the provisions of [Section 834.4.160].

Farmworker housing complexes are considered an agricultural use and are permitted by-right in the AE, AL, RE, O, R-A, and R-R zones. They are also permitted with a conditional use permit in the R-1-A, R-1-AH, R-1-E, and R-1-EH zones.

The Employee Housing Act (California Health and Safety Code Section 17021.5) 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. California Health and Safety Code Section 17021.6 requires farmworker and employee housing up to 12 units or 36 beds to be considered an agricultural use and permitted in any zone that permits agricultural uses. The County Zoning Ordinance currently complies with these requirements.

Conclusion

The County's Zoning Ordinance allows for the provision of a variety of housing types in full compliance with state law.

Recommended Action

None required.

On/Off-Site Improvements

Analysis

Typical street widths are specified in the General Plan Transportation and Circulation Element:

- Super Arterial Urban/Suburban: 100'-130', Rural: 106'-126'
- Arterial Urban/Suburban: 100'-130', Rural: 106'-126'
- Collector Urban/Suburban: 80'-84', Rural: 80'-100'

Local – Urban/Suburban: 60'-80'

Site improvements are regulated by Title 17 of the Fresno County Ordinance Code, the County Subdivision Ordinance, Zoning Ordinance, and Improvement Standards. Site improvements include such things as required grading, road layout, drainage, off-street parking, landscaping, walls, wastewater and water systems, and curbs and gutters. Typical improvements include:

- Fencing is required if the rear or side of any lot abuts a county expressway arterial or collector highway shown on the General Plan and access to such highway has been relinquished.
- If there is an existing community water and wastewater system, sanitary wastewater lines and appurtenances shall be installed, and connections made to the existing system under the following conditions:
 - a) Whenever the subdivision is zoned for single-family residential use has any lots which are less than 36,000 square feet in areas;
 - b) Whenever the subdivision is zoned for multi-family residential or commercial use; and
 - c) Whenever the Board of Supervisors determines that a community wastewater system is required for the subdivision due to topography or soil conditions, even though the conditions listed under a) and b) above are not present.
- Whenever a community wastewater treatment system is not available and a community wastewater system is required, the subdivider shall install sewage treatment facilities of sufficient capacity to provide for the entire proposed development.
- A community water system shall be provided to the property line of all divided parcels whenever the smallest lot in the subdivision contains a net area of less than two acres.
- The subdivider may be required to install or agree to install drainage facilities to adequately remove surface and stormwater from the subdivision.
- All new utilities shall be placed underground.

The County's Site Plan Review is an administrative review process to ensure compliance with the County's development and improvement standards, and other applicable ordinance noted above.

In some circumstances, such as when the development borders or is traversed by an existing street, it may be necessary to dedicate all rights-of-way to widen the street(s) to its ultimate width as shown on any master or precise plan of streets and highways; install curbs, gutters, drainage, sidewalks, street trees, street signs, street lights, required utilities; and grade and improve from curb to existing pavement. Requirements to comply with the development standards for affordable housing may result in constraints but are required to comply with State or federal health and safety guidelines.

Cumulative Impact of Development Standards

The County's residential zones contain development standards relating to density, height, setbacks, parking, and maximum lot coverage. As the County does not require a minimum amount of open space for each parcel, the only requirements that consume developable areas are setbacks and parking. In the RCC, R-R, and R-E zones, which allow 0.5 unit per acre, the development standards allow construction to achieve the highest end of the density range on any lot that meets the minimum lot size requirements. This is also true in the AE and AL zones, which allow 0.05 units per acre.

Residential zones allow between 1.1 dwelling units per acre (R-1-E and R-1- EH zones) and 29 dwelling units per acre (R-3 zone). The R-P, C-4, and C-6 zones allow up to 18 or 20 units per acre without affordable housing. On a sample one acre lot in the R-1-E zone with a single dwelling unit, setbacks would consume up to 37% of the lot and parking would consume another 1% (calculated at two spaces per unit and 300 square feet per space), leaving roughly 26,748 square feet of buildable space controlled by a maximum height limit of 35 feet. This is a substantial amount of building space for a residential unit, and development standards would not be a constraint to development in this zone.

On a sample one-acre lot in the R-2 zone with 20 units of housing in a multi-family building, setbacks would consume up to 21% of the lot and parking (surface lot format) would consume another 14% (calculated at one space per unit and 300 square feet per space), leaving roughly 28,300 square feet of buildable space controlled by a maximum height limit of 35 feet. This zone has a maximum parcel coverage of 50%, which limits the maximum developable area to 21,780 square feet. Assuming the maximum of 35foot building height, or approximately three stories, each of the 20 units could be an average of 2,614 square feet. This includes a 20% reduction for common areas, whether internal or external. Such units could easily contain at least four bedrooms while still providing large common living and kitchen areas. In lots zoned R-2-A, which limit height to one story, each of the 20 units could be an average of 871 square feet and accommodate configurations that consist of up to two bedrooms, one or two bathrooms, and areas for common living, internal washing machines, and a kitchen. To encourage the development of larger housing units and alleviate the constraint of a single-story limitation within this higher-density zone, as part of the County's upcoming Community Plan updates in Program 33, the County will amend the Zoning Ordinance as part of Program 33 to allow two-story buildings by increasing permitted heights from 20 to 25 feet in the R-2A zonework with community members to identify areas where heights above one story have local support and can be served by available firefighting equipment. Where appropriate, the County will rezone to allow for two story buildings (while retaining the "A" suffix) or rezoning the parcels from R-2A to R-2 to allow three-story buildings.

On a sample one-acre lot in the R-3 zone with 29 units of housing in a multi-family building, setbacks would consume up to just over one-third of the lot and parking (surface lot format) would consume another third (calculated at one space per unit and 300 square feet per space), leaving roughly26,100 square feet of buildable space controlled by a maximum height limit of 40 feet. This zone has a maximum parcel coverage of 60%, which limits the maximum developable area to 26,136 square feet. Assuming the maximum 40-

foot building height, or approximately four stories, each of the 29 units could be an average of 2,880 square feet. This includes a 20% reduction for common areas, whether internal or external. Such units could easily contain at least four bedrooms while still providing sufficient common living and kitchen areas. In lots zoned R-3A, which limit height to 20 feet (effectively one story), each of the 29 units could be an average of 720 square feet and accommodate configurations that consist of up to two bedrooms, one bathroom, and areas for common living, internal washing machines (or a second bathroom), and a galley-style kitchen. While the density of 29 units per acre could, on paper, be achieved in a single story, the one-story restriction is considered to be a constraint. Additionally, the R-3A zone is not currently applied to any parcel in the county. Accordingly, as part of Program 33, the County will remove the R-3A zone and enable future development to seek high density residential development through the R-3 zone, which permits multi-story buildings up to 40 feet in height. To encourage the development of larger housing units within this higherdensity zone, as part of the County's upcoming Community Plan updates in Program 33, the County will work with community members to identify areas where heights above one story have local support and can be served by available firefighting equipment. Where appropriate, the County will rezone to allow for two story buildings (while retaining the "A" suffix) or rezoning the parcels from R-3A to R-3 to allow threestory buildings.

Increased density provided as part of a density bonus was not analyzed as affordable housing developments are also entitled by state law to concessions including reduced parking standards that ensure the housing development can reach the maximum density requested.

Conclusion

Development requirements of the County of Fresno are appropriate to meet state and federal safety requirements, are less burdensome compared to those required by surrounding cities, and permit development to easily reach maximum densities permitted.

Recommended Action

None required.

Fees and Exactions

Analysis

Typical County fees are summarized in Table 1A-31 with the application of fees to sample housing developments summarized in Table 1A-32A and compared to other jurisdictions in Table 1A-32B. While the County has suspended the collection of public facilities impact fees to further lower the cost of housing development, other processing and entitlement fees are posted on the County's website.⁴

⁴ The County's Master Schedule of Fees is posted on the following webpage: https://www.fresnocountyca.gov/Departments/Public-Works-and-Planning/divisions-of-public-works-and-planning/development-services-division/planning-and-land-use

Action	Fee
Conditional Use Permit (CUP)	\$9,123
Planned Development	combine CUP fee and TT fee
General Plan Amendment (GPA)	\$7,000 - \$15,000 (depending on project complexity)
Amendment Application [AA (rezone)]	\$6,214
Combination Plan Amendment and Rezone	\$13,214 - \$21,214 (depending on project complexity)
Director Review and Approval (DRA)	\$1,570
Variance (Class I for residential Zones)	\$3,204
Tentative Parcel Map (TPM)	\$4,292 + \$127 per proposed parcel
Tentative Tract Map (TT)	\$4,490 + \$457 per lot (first 40 lots) + \$229 per lot (next 35 lots) + \$116 per lot (next 75 lots) + \$72.50 per lot (next 150 lots)
Variance (Class II for non-residential Zones)	\$6,049
Environmental Review – Exemption	\$259
Environmental Assessment Class I (for GPAs)	\$5,151
Environmental Assessment Class II (for AAs, CUPs and TTs)	\$3,901
Environmental Assessment Class III (for DRAs and TPMs)	\$1,151

Table 1A-31: Schedule of Typical Residential Development Processing Fees

Source: County of Fresno, 2023.

Fee Туре	Single-Family	Multi-Family
Countywide Public Protection	\$1,644	\$1,208
General Government	\$1,424	\$1,046
Library ¹	\$485	\$356
Health and Human Services	\$417	\$306
Sherriff	\$257	\$189
County Parks	\$65	\$48
Administration	\$107	\$79
School ²	\$6,170	\$3,085
Regional Transportation Mitigation	\$4,099	\$3,000
Indirect Source Review	\$1,100	\$500
Total	\$15,768	\$9,817

Table 1A-32A: Example Application of Development Fees in the Unincorporated County

Notes:

1. For areas in the Coalinga-Huron Library District, this fee is waived (charged through property taxes).

School fees vary by district. For the purpose of estimating school fees, the average of impact fees from the 2. Riverdale School District (\$3.20 per square foot) and Laton School District (\$2.97 per square foot) were used. The analysis also assumes a typical 2,000 sq ft single-family home and 1,000 sq ft multi-family unit.

Source: County of Fresno, 2023.

The County surveyed per-unit development fees in other jurisdictions within the county, as shown in Table 1A-32B. This comparison shows that the County charges lower fees per unit than most other jurisdictions examined (only exception being projects in Reedley's City Center area). Based on a combination of construction costs and building permit, plan check, and impact fees, the per-unit development fees typically represent roughly 5% of project valuation for single-family projects (valuation over \$300,000 per unit) and less than 5% of multifamily projects (valuation over \$200,000 per unit), which is below a more common 10% figure found in incorporated jurisdictions.

Fee Туре	Single-Family, Total	Multi-Family, Total
Fresno County	\$15,768	\$9,817
City of Fresno	\$25,303	\$18,273
Coalinga	\$26,782	\$18,797
Huron	\$28,352	\$15,448
Reedley (Expansion Area)	\$18,398	\$17,569
Reedley (City Center Area)	\$10,922	\$8,785
Reedley (Infill Area)	\$16,384	\$13,177
Sanger	\$26,791	\$18,600
Selma	\$27,019	\$16,312

Table 1A-32B: Comparison of Per-Unit Development Fees within Fresno County

Sources: Draft and Adopted Housing Elements.

Note: Fees above do not include permit processing, including building, electrical, plumbing, or mechanical permits.

Conclusion

Based on recent development proposals in the unincorporated county, a developer can expect to pay approximately \$15,768 per single-family unit and \$9,817 per multifamily unit in fees (not including planning and development impact fees). Development costs are minimized by the County with the Board of Supervisors' decision to suspend public facilities impact fees in 2015 (and voted in 2018 to continue the suspension). As a result, applicants only pay impact fees to community services districts, regional fees, and school fees. While fees obviously add to the cost of developing housing, the County minimizes the size of development fees to cover processing costs and health and safety services. Additionally, fees in the County are similar to or lower than those of other jurisdictions in the county. Accordingly, the County's fees are not considered a constraint.

Recommended Action

Program 21 is included to continue monitoring fees to ensure they do not unduly constrain housing development.

Processing and Permit Procedures

Analysis

The Public Works and Planning Department is responsible for application intake, permit issuance, plan checking, and inspection services for public and private projects. The Department provides public counter services, subdivision processing, various entitlements associated with development, and engineering and technical staff support to commercial and residential projects. Working in tandem, the primary objective is expeditious review and approval of all development projects. County staff encourages applicants to contact them prior to completing applications, particularly for large projects. This allows permitting and zoning issues to be discussed by the applicant and staff, resulting in more efficient processing.

The development approval process in the County is governed by three levels of decision-making bodies: the Department of Public Works and Planning (and its Director), the Planning Commission, and the Board of Supervisors. As shown in Tables 1A-28 and 29, single- and multi-family development applications are typically permitted by right, subject only to review and issuance by County staff (the staff planner assigned to review the application) for compliance with development standards. A limited number of residential uses require Director Review and Approval (DRA), which extends the review and approval process from staff planners to include the Director of Public Works and Planning. Under the DRA process, the Director is the final approval body, but may defer action and refer the permit or approval application to the Commission for final determination if significant opposition is expressed by the public, except in the case of a Reasonable Accommodation. The DRA process reviews the application and verifies consistency with the Zoning Ordinance and does not have additional findings. In approving a Director's Review and Approval application, the Director (or the Commission, on a referral) may impose conditions deemed reasonable and

necessary to ensure that the approval would be in compliance with the Zoning Ordinance. As part of Program 20, the County will review (and revise as necessary) the DRA process to ensure that it is limited to compliance with objective standards.

Additional review involving the Planning Commission only occurs for a limited set of residential uses and zones, such as multi-family development in the C-6 zone and mixed-use residential in commercial zones. Recent legislation enacted (signed into law in September 2022) through Senate Bill 6 (SB 6) and Assembly Bill 2011 (AB 2011), residential development shall be permitted on property zoned for commercial (office or retail) use through the year 2033. Under the provisions of SB 6, the County can require discretionary review while under the provisions of AB 2011, the County must allow residential by right. However, under the provisions of AB 2011, there are additional requirements for parcel location and affordability in order to qualify for by right ministerial review. Through the implementation of Program 20, the County will update its Zoning Ordinance to be consistent with state law regarding the approval of residential development in commercial zones.

The Board of Supervisors are only involved when there is a request for a formal amendment to the General Plan, Zoning Map, or Zoning Ordinance (including specific plans); development agreements; or when there is an appeal of the Planning Commission's decision (such as a request for a variance).

Table 1A-33 depicts the typical approval and processing time for typical residential developments. The timing for applications involving general plan or zoning amendments is influenced by the size and complexity of the proposed project, including the type of environmental clearance and mitigation required.

	Single Family	Single- Family (2–4 units)	Single- Family (5+ units)	Multi- Family (2–4 units)	Multi- Family (5+ units)	Mixed Use
Approvals Required	Staff	Staff	Staff	Staff	Staff	Planning Commission
Processing Time	3 months	3 months	4-5 months	9 months	9 months	9 months

Table 1A-33: Approvals and Processing Times for Typical Developments

Source: County of Fresno, 2023.

Conditional Use Permits

Where a conditional use permit is required, the Director shall make an investigation of the facts bearing on the case to provide the information necessary for the Planning Commission's review. A public hearing with the Commission is scheduled once the Director determines the application to be complete. The Commission may approve a Conditional Use Permit application, with or without conditions, only if all of the four following findings are made:

- 1. The site for the proposed use is adequate in size and shape to accommodate the use and all yards, spaces, walls and fences, parking, loading, landscaping, and other features required by this Chapter, to adjust the use with land and uses in the neighborhood;
- 2. The site for the proposed use relates to streets and highways adequate in width and pavement type to carry the quantity and kind of traffic generated by the proposed use;
- 3. The proposed use will have no adverse impact on abutting property and surrounding neighborhood or allowed use thereof;
- 4. The proposed development is consistent with the General Plan.

As part of the approval, the Commission may impose conditions deemed reasonable and necessary to protect the public health, safety, and general welfare and to ensure that the approval would be in compliance with the findings required. The conditional use permit process is not considered to be a constraint, and applies to only a limited number of residential uses, including large SRO developments in the R-2/R-2A, R-3/R-3A, and C-4 zones; multifamily uses in the C-6 zone; mixed-use residential in several commercial zones; and farmworker/employee housing complexes in R-1-A/R-1-AH and R-1-E/R-1-EH zones. Current CUP requirements for transitional housing will be amended through Program 20. While the R-3A zone will be removed through Program 33, there are no parcels currently designated with this zone, and so there would be no reduction in the number of parcels or amount of area where SROs are permitted.

As part of Program 20, the County will also meet with developers to identify whether any of the required findings or other aspects of the development review process have presented constraints to development and amend its project review process to address these constraints as is feasible. Additionally, the County will review required conditional use permit findings and amend the Zoning Ordinance to remove subjective findings from residential uses as needed to ensure objectivity, including clarifying finding 1 to specify that site adequacy may only be determined through objective standards, and either removing finding 3 or redefining the findings to use objective standards.

Senate Bill 330

As part of Program 22, the County will establish a procedure to address SB 330. The requisite development review and preliminary application processes outlined in Senate Bill 330 will be codified in the County's Zoning Ordinance.

Senate Bill 35

The County recently amended its Zoning Ordinance to define projects eligible for a project approval streamlining process under Senate Bill 35. Projects are eligible for ministerial review if they satisfy the following criteria:

Project is a multifamily housing development consisting of two or more units.

- Project dedicates either 10% or 50% of units affordable to 80% of average median income (AMI)
- Project site is on land zoned for residential or mixed-use residential use.
- Project site is on land in an urbanized area where 75% of the perimeter of site is developed.
- Project is consistent with objective zoning and design review standards.
- Project site is not located on or in any of the following: (1) coastal zone, (2) prime farmland, or farmland of statewide importance, (3) wetlands, (4) within a very high fire severity zone, (5) a hazardous waste site, (6) within a delineated earthquake fault zone, (7) within a flood plain, (8) within a floodway, (9) identified for conservation in an adopted natural community conservation plan, (10) habitat for protected species or (11) lands under conservation easement.
- Project does not propose demolition of (1) housing subject to a recorded covenant, ordinance, or law
 that restricts rents to levels affordable to persons and families of moderate-, low-, or very low-income,
 or (2) housing subject to rent or price control, or (3) housing occupied by tenants within the past 10
 years.

As part of Program 22, the County will amend its Zoning Ordinance to define the application and review process for projects seeking review under SB 35.

Conclusion

The County does not have a lengthy project review process due to the fact that nearly all residential development is permitted by right and can be approved by County staff, with no requirement for public hearings before the Planning Commission or Board of Supervisors.

Recommended Action

Through the implementation of Program 20, the County will update its Zoning Ordinance to be consistent with state law regarding the approval of residential development in commercial zones as well as to remove subjective standards from the conditional use permit review process. As part of Program 22, the County will amend its Zoning Ordinance to define the application and review process for projects seeking review under SB 35.

Building Codes

Analysis

The Building and Safety Unit, a part of the Development Services Division of the County's Public Works and Planning Department, is responsible for the administration of various codes covering the standards for construction, alterations, additions, and relocation of structures, including the appropriate building, mechanical, plumbing, and electrical regulations to ensure the public's safety. As of January 1, 2023, the County adopted the following codes:

2022 California Building Code

- 2022 California Fire Code
- 2022 California Electrical Code
- 2022 California Mechanical Code
- 2022 California Plumbing Code
- 2022 California Residential Code
- 2022 California Green Building Standards Code

Minor local amendments have been made to these codes, many of which are not related to residential development applications. Amendments to these codes that may apply to residential structures include:

- CBC Section 202, definitions, amends the definition of condominium.
- Solar Energy Systems Section 3111.1.2 was amended to add standards for translucent glazing panels.
- CBC Section 1505 and CRC 902 were amended to specify that in California Department of Forestry State Responsibility Areas, all roof coverings for any occupancy group or construction type shall be a minimum Class "A" roof covering.
- CBC Section 1208.2 was amended to modify access requirements to attic spaces separated by vaulted ceilings.
- CBC Section 1805 was amended to require that foundation walls or concrete floor slabs be constructed above the crown of the adjoining street unless otherwise approved by the building official and to specify required grading. Both amendments were made for waterproofing and damp-proofing purposes.

The size of the unincorporated county area makes proactive code enforcement through regular windshield surveys infeasible. However, as part of ongoing outreach efforts and targeted outreach for projects such as the General Plan, Housing Element, and Community Plan updates, the County proactively visits with community members and service providers to accept feedback on housing-related issues. This creates an opportunity for the County to receive feedback on areas of the county that are in need of review by code enforcement officers. As part of Program 24, the County will intentionally solicit feedback from community members and service providers on code enforcement-related issues through these and other community meetings during the planning period.

Conclusion

Local amendments to the building codes have been made, but none that would significantly increase housing costs.

Recommended Action

None required.

Constraints on Housing for Persons with Disabilities

Analysis

California Building Code

The County adopted the 2022 California Building Code, including Title 24 regulations of the code concerning accessibility for persons with disabilities.

Definition of Family

The Fresno County Zoning Ordinance defines a 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 is not overly restrictive and does not constrain access to, or the development of, housing.

Zoning and Land Use Policies

The Zoning Ordinance permits group housing for six or fewer persons by right in all zones that allow singlefamily uses by right. Residential care homes of seven or more residents are permitted subject to a conditional use permit in residential zones. Residential care homes for any number of residents are also permitted by right in the C-1, C-2, C-3, C-4, C-6, and R-P zones.

Reasonable Accommodation

The County has a formal process to grant reasonable accommodation requests. An RA Request may be made by any person with a disability, his or her representative, or a developer or provider of housing or other services for persons with disabilities, when the application of a County land-use or building regulation, policy, practice, or procedure, acts as a barrier to meaningful access to County programs or to fair-housing opportunities for persons with disabilities. Reasonable Accommodation means providing persons with disabilities flexibility in the application of County programs, including: County land-use, zoning and building regulations, policies, practices, and procedures, or waiving certain requirements when it is necessary to provide meaningful access to County programs or to eliminate barriers to housing opportunities for persons with disabilities.

Individuals submitting a Reasonable Accommodations Request are encouraged to provide information that will assist the Review Authority in making its determination. This information includes:

- 1. Information necessary to establish the individual has a disability, unless the disability of the individual requesting an accommodation is readily apparent.
- 2. A description of the needed accommodation or modification.

3. A showing of the relationship between the disability and how the requested accommodation or modification is necessary to afford the person with a disability equal opportunity to use or enjoy a dwelling or housing opportunity.

Prior to the approval of a Reasonable Accommodation Request, the following findings must be made to ensure consistency with the acts (per Section 852.5.050 of the County Zoning Ordinance):

- 1. The housing which is the subject of the request will be used by a person with disabilities protected under the Acts.
- 2. As applicable, the requested accommodation is necessary to afford a person with disabilities protected under the Acts with equal opportunities to use or enjoy a dwelling or housing opportunity.
- 3. The requested accommodation would not impose an undue financial or administrative burden on the County.
- 4. The requested accommodation would not require a fundamental alteration in the nature of the County's policies, practices, or procedures, including consideration of alternatives which may provide an equal level of benefit.
- 5. The requested accommodation will not result in a direct and significant threat to the health or safety of other persons or substantial physical damage to the property of others. (See Section 12179 of Title 2 of the Code of California Regulations)

The Director of Public Works and Planning is the final authority on a RA Request relating to a requirement of the Zoning Ordinance and may designate an employee in the Department as the Review Authority to make a final determination on such RA Requests.

Appeals of the Review Authority's decision may be made within 15 business days of the date of mailing of the Review Authority's written decision. Appeals must be made in writing. The appeal will then be heard by the County Hearing Officer within 30 calendar days from the date that the Review Authority receives the notice of appeal. The appeal hearing shall be confidential. The decision of the Hearing Officer is final and shall be mailed by first-class mail to the applicant with return receipt requested. Upon request, Department staff will provide assistance to a Requestor needing assistance in filing an appeal to ensure that the appeals process is accessible to persons with disabilities. However, Department staff are prohibited from providing legal advice or legal representation. As part of Program 20, the County will revise this procedure to clarify that appeals to Reasonable Accommodations decisions may only be made by the applicant or the personal beneficiary of the accommodation.

Conclusion

The County's Reasonable Accommodations procedures and definition of family are not a barrier to development or housing access.

Recommended Action

None required.

SECTION 1A-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 County of Fresno was assigned a RHNA of 2,722 units, divided into four income categories:

- Very Low-Income (less than 50% of the Area Median Income)
- Low-Income (50 to 80% of the Area Median Income)
- Moderate-Income (80 to 120% of the Area Median Income)
- Above Moderate-Income (greater than 120% of the Area Median Income)

Table 1A-34 summarizes the County's accomplishments (through June 30, 2023) in meeting the RHNA during the previous RHNA projection period.

Income Category	2015–2023 RHNA	2015–2023 Building Permits Issued	Percentage of RHNA Accomplished	
Very Low	460	77	17%	
Low	527	106	20%	
Moderate	589	203	32%	
Above Moderate	1,146	155	13%	
Total	2,722	541	20%	

Table 1A-34: Units Permitted, 2015-2023 RHNA, Unincorporated County

Source: Fresno County, 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 1A-34), the County worked diligently to continuously promote housing for special-needs groups in a variety of ways. Some of the accomplishments are highlighted below:

- The Board of Supervisors approved amendments to the Zoning Ordinance in 2015 and 2020 to accommodate for special needs housing. The County pursued CDBG and HOME funding and published a Notice of Funding Availability (NOFA) for gap financing to develop affordable housing. Through this financing, the City of Kerman (Gateway Apartments) was awarded \$980,000 in County HOME funds for a 61-unit affordable housing project, and the City of Kingsburg (Linnaea Villas) was awarded \$1,000,000 in County HOME funds for a 47-unit affordable housing project, both of which were successful in receiving State Tax Credits.
- In 2020, the County approved HOME funds to Habitat for Humanity for the acquisition, construction, and sale of two single-family developments. Country Meadows, developed by Habitat for Humanity, will build eight single-family residences for sale to eligible low- and moderateincome households in the community of Riverdale.
- The County approved HOME funds for the Reedley Homeownership Project, developed by Self-Help Enterprises, which built 10 single-family residences for sale to eligible low- and moderateincome households in the City of Reedley. The project also used USDA funds.
- In 2020, the Department of Social Services applied to HCD for Homekey funds of \$13.5 million to
 provide homeless assistance. The County assisted in the purchase of a 200 unit-motel in the City
 of Fresno that housed homeless individuals during Covid, with the intent of converting the project
 to permanent housing. Crossroads Village is scheduled for completion in 2024 and will consist of
 143 permanent housing units (a mixture of one-, two-, and three-bedroom units) for individuals that
 are disabled or at risk of homelessness.
- Fresno County was awarded \$1.6 million from the HCD's Permanent Local Housing Allocation program and awarded \$1.5 million to the Esperanza Commons project to preserve 60 farmworker apartments in the City of Mendota
- To ensure housing for special needs groups, the County amended the Zoning Ordinance to permit single room occupancy units and multi-family housing in the C-4 zone. The County also included density bonus provisions and increased density in several residential and commercial zones to 20 units per acre.

The County Department of Behavioral Health (DBH) has been instrumental during the planning period in assisting in the development of various supportive housing developments such as: Parc Grove, a 40-unit supportive and veterans housing development built in 2018 in the City of Fresno; Alegre Commons, a 42-unit family supportive housing development built in 2022 in the City of Fresno; and Butterfly Gardens, the first supportive housing development in the City of Clovis, built in 2022 and providing 75 units for individuals that are disabled and at risk of homelessness.

Progress Towards Meeting Housing Element Programs

Table 1A-35 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 Action Plan for the 2023-2031 Housing Element.

Housing Element Program	Evaluation	Recommendation
1. Regional Collaboration on Housing Opportunities	• In 2021, representatives of the local governments who participated in the Fifth-Cycle Housing Element Update	This program will continue into the Sixth-Cycle Housing Element. The
The County of Fresno Department of Public Works and Planning (PWP), with assistance of the Fresno Council of	(Committee) met to discuss the potential for preparing a Sixth-Cycle Multi-Jurisdictional Housing Element	collaboration efforts continue to allow the County and all other local cities to
Governments (FCOG), will take the lead in coordinating the Countywide Fifth-Cycle Housing Element Committee meetings.	Update. In 2020, the Committee met to discuss implementation of programs and the additional needs for individual jurisdictions. In 2017, 2018, and 2019, the	address the housing needs as outlined in the County's General Plan, which is promoting growth in the incorporated
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 244), infrastructure challenges, farmworker housing, homelessness, and fair	Committee met biannually to discuss the Fifth-Cycle Housing Element Update. In 2016, the committee met quarterly in 2016 to discuss implementation of the housing element as well as implementation of Senate Bill 244 (SB 244).	cities of the county.
housing. The Committee will meet at least biannually to evaluate successes in implementation of programs and to identify gaps and additional needs.	• In 2020, Fresno County staff took the lead on the participation in the Countywide Housing Element Technical Committee to discuss the implementation of Housing Element Programs and regional housing issues. Representatives realized that implementation of SB 244,	
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	as well as local infrastructure issues, is the obligation of individual local governments. The County and the cities continue to work together to address low-income housing, farmworker housing, homelessness, and fair 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	• The Committee met with the California Department of Housing and Community Development in 2020, 2019 and 2018 and discussed success and challenges with implementing Housing Element programs.	
opportunities for education. The Committee will advocate on behalf of the Fresno County region for more grant funding for affordable housing and infrastructure improvements.	 An official from the Fair Housing of Central California made a presentation to the Committee in 2021 and in 2017 to discuss how to handle complaints on fair housing issues. 	
Continue to seek partnerships with other jurisdictions in the region and other agencies (such as the Fresno County 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 Committee is committed to assisting agencies in applying for grant funding for affordable housing development and infrastructure improvement throughout the County of Fresno. In 2022, (conducted in 2023) the County will conduct a feasibility study on a regional housing trust for affordable housing.	

Housing Element Program	Evaluation	Recommendation
	• The Committee continues to work collaboratively with other cities in the County as well as other agencies to find proper locations for the development of affordable housing, including farmworker housing. The County created 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.	
	• The County of Fresno collaborates with the cities, developers, and stakeholders to explore options for development of affordable housing. Recent highlights are listed below.	
	• In 2019, a 60-unit affordable housing project was completed in the City of Fowler using County HOME Investment Partnership Program (HOME) funds.	
	 In 2019, County staff published a Notice of Funding Availability (NOFA) for gap financing to develop affordable housing. The City of Kerman (Gateway Apartments) was awarded \$980,000 in County HOME funds for a 61-unit affordable housing project, and the City of Kingsburg (Linnaea Villas) was awarded \$1,000,000 in County HOME funds for a 47-unit affordable housing project, both of which were successful in receiving State Tax Credits. 	
 Review Annexation Standards in Memorandum of Understanding During the Housing Element planning period, the County of Fresno and the cities within the County will work together to review and revise, as deemed appropriate by all parties, the standards for annexation contained in the Memorandum of 	• The County works with cities on any proposed revision to the Standards for Annexation contained in the Memorandum of Understanding (MOU) either at the time of renewal of MOUs or upon a request by a city. The County works with cities on the annexation of land to allow the cities to meet their share of Regional Housing Needs Allocation.	This program will continue into the Sixth-Cycle Housing Element. It was successful as the County has an executed MOU with 12 of 15 cities. MOUs to be amended to include Regional Housing Needs Allocation (RHNA) transfer language and, the
Understanding between the County and the cities.	• In 2022, the Cities of Kingsburg, Orange Cove, and Parlier's MOU were extended for 15 years.	County will continue to work with the cities of Fresno, Huron, and Sanger in executing an MOU.
	• In 2017, Fresno County and City of Reedley staff worked together and proposed an amendment to the MOU between the County and the City of Reedley; approved by the Board of Supervisors on September 26, 2017.	

Housing Element Program	Evaluation	Recommendation
 3. Adequate Sites Program The County will provide for a variety of housing types and ensure that there are adequate sites available to meet its RHNA. Complete General Plan and Zoning Ordinance technical amendments in 2016 to achieve internal consistency Maintain and annually update the inventory of residential land resources. Monitor development and other changes in the inventory to ensure the County has remaining capacity consistent with its share of the regional housing need. Continue to designate and zone adequate sites to meet special housing needs as required. Continue to encourage a variety of housing types for all income levels such as mixed use and higher density housing through implementation of the General Plan and community plans, through incentives or other mechanisms encouraging affordability, maintaining existing zoning and upzoning where appropriate. These efforts will also consider promoting development within existing communities, active transportation and access to services and amenities. Direct interested residential developers, especially affordable housing developers throughout the County, to community plan and specific plan areas where amenities are or can be located and where water and wastewater service providers have or can provide capacity and potential for the expansion of infrastructure (see Program 12), such as: the Shaver Lake Forest Specific Plan, Millerton Specific Plan, Sierra North Regional Plan, Laton, and Tranquillity areas. Meet with developers to discuss constraints and opportunities on TP zoned sites and address constraints and establish incentives, procedures, or other mechanism by 2017 to promote development. 	 Amendments to the Land Use and Agriculture of the General Plan and various sections of the Zoning Ordinance were approved by the Board of Supervisors in 2020 to achieve internal consistency and to bring these documents in compliance with the Housing Element laws. This program has been implemented. The County annually monitors its inventory of lands identified in the Housing Element inventory to ensure there are adequate sites available to accommodate the County's RHNA obligations for the remainder of the planning period. The County currently has adequate vacant land inventory to accommodate the remaining number of units in all income categories for the balance of the Fifth-Cycle Update. After accounting for units built or under construction, planned and approved projects, and comparing the remaining RHNA obligations against available vacant land, the County's Fifth-Cycle Housing Element identified a surplus vacant land for 1,123 units in the very low- and the low-income categories; 2,826 units in the moderate-income category; and 7,227 units for the above moderate-income category. In 2021 the Superior Court ordered the County to set aside land use approvals for the Friant Ranch Specific Plan. When reducing the number of housing units that the Friant Ranch development could accommodate, the remaining inventory can accommodate the following number of units: 1,073 units for the very low- and low-income categories; 2,480 for moderate-income category; and 5,123 units for the above moderate-income category. The Board of Supervisors approved amendments to the Zoning Ordinance in 2015 and 2020 to accommodate for special needs housing. The County's General Plan promotes development of housing units. Amendments to the General Plan and the Zoning Ordinance were approved in 2020 to increase the density on land designated and zoned for 	This program will continue into the Sixth-Cycle Housing Element. It was successful as the County was able to maintain the adequate number of sites required through the Fifth-Cycle Housing Element. The County has identified land to accommodate the required RHNA obligation for the Sixth-Cycle Housing Element and plans on monitoring compliance throughout the planning period. The County made various amendments to ensure variety of housing types can be accommodated.

Housing Element Program	Evaluation	Recommendation
Actively participate in the development of the next RHNA Plan to better ensure that the allocations are reflective of the County's General Plan policies and are realistic based on land use patterns in the unincorporated county.	 multi-family residential development to 20 units per-acre in order to lower the cost of housing. The Zoning Ordinance amendment included the Density Bonus provisions to reduce the cost of housing development and to promote the development of affordable housing. Additionally, the County has suspended the collection of impact fees to further lower the cost of housing development, including housing for low-income populations. 	
	• The County continues to direct interested residential developers, including affordable housing developers, to develop in the County's unincorporated communities including the Shaver Lake Forest Specific Plan, Millerton Specific Plan, Sierra North Regional Plan, Laton, and Tranquillity areas. In 2021 and 2020, County staff met with interested developers, such as: the Fresno County Housing Authority, Self-Help Enterprises, Habitat for Humanity Fresno County, and Central Valley Coalition for Affordable Housing to discuss residential development within Fresno County's unincorporated communities.	
	• The County meets with interested developers to discuss constraints and opportunities for the development of affordable housing on sites zoned for the development of mobile home parks. The County has committed to supporting housing developers and agencies who are active in the development of affordable housing such as the Fresno County Housing Authority and Self-Help Enterprises in the application of funds for affordable housing development, including California HCD and US Department of Agriculture (USDA) Rural Development loans and grants, and other funding sources that may become available. The suspension of impact fees by the Board of Supervisors is an incentive for the development of affordable housing in unincorporated communities including sites that are zoned for mobile home park development. In 2021, County staff met with two mobile home park developers who expressed interest in	

Housing Element Program	Evaluation	Recommendation
	developing a mobile home park in the unincorporated county. County staff also spoke with staff from California Rural Legal Assistance (CRLA) regarding residents interested in purchasing an existing mobile home park. Additionally, County staff also discussed Trailer Parks during two annual housing conferences held 2021.	
	• In 2020, County staff held two virtual countywide housing forums open to residents, community members, housing advocates, Community Service District Members, and developers. During these public forums, T- P zoning and constraints to T-P development were discussed. Developers helped identify T-P zoned parcels available for development and actions to encourage this type of development.	
	• The County has actively participated in the development of RHNA methodology for the past Housing Element cycle updates including the Sixth-Cycle Housing Element Update in 2021 to ensure the allocations are achievable and reflective of the County's General Plan policies.	
	• In 2022 and 2023, County staff met several times with the residents of Shady Lakes Mobile Home Park and worked with a development team led by CRLA to identify funding sources to assist the residents in purchasing the park. The residents decided not to apply for County HOME funds but have applied for other state funds. The County provided technical assistance to help the team prepare funding applications.	
 4. Monitoring of Residential Capacity (No Net Loss) Develop and implement a formal evaluation procedure pursuant to Government Code Section 65863 by 2016. Annually monitor the effectiveness of non-residential zones to facilitate residential development. 	• The County has developed an application within its Permit Tracking System (known as AMANDA) that allows the Policy Planning Unit staff to monitor proposed discretionary projects and building permit applications. The system will lock when the Assessor Parcel Number (APN) of a parcel that is included in the vacant land inventory is inputted. If the proposed permit would	This program will continue into the Sixth-Cycle Housing Element but is not needed as a separate program and will be merged into the Adequate Sites Program. It was successful as the County was able to maintain the adequate number of sites required
If rezoning/upzoning is required to replenish the sites inventory for meeting the RHNA shortfall, the sites shall be adequate in size to accommodate at least 16 units per site at a minimum	involve changing the land use designation or zoning of a parcel that would result in a reduction of available vacant land inventory in any income category, the applicant will be informed of appropriate actions that must be taken to	through the Fifth-Cycle Housing Element. The County has identified land to accommodate the required RHNA obligation for the Sixth-Cycle

Housing Element Program	Evaluation	Recommendation
density of 20 units per acre and shall be rezoned within two years.	 remedy the reduction. This procedure also allows County staff to monitor permit activities during any given calendar year. The Policy Planning Unit staff performs a quantitative analysis according to Government Code Section 65863 to determine whether the remaining sites included in the inventory are adequate to meet the County's remaining share of RHNA obligation for each income category for the duration of the Fifth-Cycle Update. The County annually monitors and evaluates its inventory of vacant sites to ensure sufficient sites are available to accommodate the County's share of the Fifth-Cycle RHNA. The Fifth-Cycle vacant land inventory includes parcels that are not zoned residential but would allow the development of multi-family residential. Since the adoption of the Fifth-Cycle Housing Element, the County has not received any residential development application on non-residentially zoned land. 	and plans on monitoring compliance throughout the planning period.
 5. Lot Consolidation and Lot Splits Assist interested developers/property owners in identifying opportunities for lot consolidation or lot splitting. Continue to streamline the processing of requests for lot consolidation and lot splitting concurrent with other development reviews. Annually monitor lot consolidation activities as part of the County's annual report to HCD on Housing Element progress and evaluate if County efforts are effective in facilitating lot consolidation of small sites for residential development. If appropriate, make necessary changes to facilitate lot consolidation. Encourage the use of master plans/specific plans to provide a cohesive development strategy for large lots. 	 No residential development required lot consolidation or lot splitting. Consistent with other programs and policies, the County continued to encourage most housing development in the county to take place in cities (where more infrastructure, services, and jobs are located). Additionally, the development community continued to buy or option large unincorporated parcels and proceed with lot consolidation and/or splitting after or in conjunction with annexation into a city. 	This program will continue into the Sixth-Cycle Housing Element but will be modified based on the County's change in sites inventory strategy. The Fifth-Cycle Housing Element sites inventory focused on parcels smaller than one acre, which could accommodate lower-income housing through lower density rural housing, along with a strategy of focusing affordable housing through specific plans and growth in cities. The County's Sixth-Cycle Housing Element sites inventory focused on parcels that are often larger than one acre but smaller than 10 acres and do not require lot consolidation or splitting.
6. Coordination of Infrastructure and Services	• County staff seek partnerships and regularly meet with other agencies, housing developers, and community	This program will continue into the Sixth-Cycle Housing Element, but its

Housing Element Program	Evaluation	Recommendation
As funding permits, Community Development Block Grant (CDBG) and/or HOME funds provide gap financing to affordable projects as a means to reducing the costs of development, including infrastructure improvements. At least annually meet with developers and community stakeholders to discuss and pursue or support additional funding resources. Continue to coordinate with independent service providers to assess development trends, needs for infrastructure and services, and plans for expansion. Communicate with the service providers at least semi-annually or as major development applications are received to discuss and pursue plans for future expansion to ensure adequate infrastructure and services are available to meet the County's RHNA, consistent with housing development trends. As part of coordination and communication with community service districts (CSDs), provide assistance as appropriate to encourage infrastructure improvements in communities with infrastructure and service deficiencies. Seek (at least annually and on-going) and support funding applications by CSDs for infrastructure and service expansions that are consistent with the County's General Plan and Community Plan policies. Annually explore and pursue funding opportunities for community plan updates as necessary to promote development within existing communities. Provide a copy of the adopted Housing Element to the various service providers serving the unincorporated communities. Continue to coordinate with independent service providers to assess development trends, needs for infrastructure and services, and plans for expansion. Communicate with the service providers at least semi-annually or as major development applications are received to discuss and pursue plans for future expansion to ensure adequate infrastructure and services providers at least semi-annually or as major	 stakeholders to discuss and pursue opportunities to develop affordable housing. In 2022, 2021, and 2020, the County of Fresno hosted two housing forums each year to discuss housing issues and funding resources available throughout the County. The first forum provided the residents of Fresno County with an overview of housing services provided by various departments in the County and allowed residents to express their housing needs. The second forum was to educate potential developers about housing needs and the potential resources for development in the County. In 2020, the County representatives met with developer Willow Partners to discuss an apartment complex to be developed in an unincorporated community. The County continues its efforts to provide HOME funds as gap financing to develop new affordable housing projects in the unincorporated county and its partner cities. In 2020, the City of Kerman (Gateway Apartments) was awarded \$980,000 in County HOME funds for a 61-unit affordable housing project, and the City of Kingsburg (Linnaea Villas) was awarded \$1,000,000 in County HOME funds for a 47-unit affordable housing project, both of which were successful in receiving State Tax Credits. In 2020, the County approved HOME funds to Self-Help Enterprises and Habitat for Humanity. One project was for the acquisition, construction, and sale of two single-family developments. Additionally, Country Meadows II, developed by Habitat for Humanity, will build eight single-family residences for sale to eligible low- and moderate-income households in the community of Riverdale. Reedley Homeownership Project, developed by Self-Help Enterprises, built 10 single-family residences for sale to eligible low- and moderate-income households in the City of Reedley. 	efforts will be distributed throughout multiple programs given the new emphasis on extending infrastructure and services in a manner that affirmatively furthers fair housing and addresses the County's environmental justice goals and objectives. It was successful as the County was able to award 20 infrastructure projects during the planning period. Most projects consisted of improvements related to wastewater, water, sidewalks, and fire safety in various disadvantaged communities.

Housing Element Program	Evaluation	Recommendation
services are available to meet the County's RHNA, consistent with housing development trends. Annually explore and pursue funding opportunities for community plan updates as necessary to promote development within existing communities with active transportation and access to services and amenities.	 Investment Partnership Program (HOME) funds. The County was awarded a state Housing Preservation Grant (HPG) and funds were used in 2019 to assist eligible low- income homeowners in Fresno County who required assistance for housing repairs and rehabilitation. The County completed one HOME-funded affordable housing project during 2018, which expanded the supply of affordable housing for lower-income households in the City of Sanger by 48 units. 	
	• County staff communicates with water and wastewater service providers to assess the infrastructure and services in unincorporated communities and their plan for expansion of infrastructure and services to accommodate growth. The County encourages water and wastewater service providers to improve infrastructure in communities with service deficiencies. County staff annually publishes and sends out notices to service providers regarding the application period to apply for grants to fund public facility and infrastructure improvement projects in the eligible unincorporated areas of Fresno County.	
	• In 2021, Fresno County awarded funding to three projects in the unincorporated areas of Fresno County (Riverdale Memorial Hall Improvements, Caruthers Wastewater Treatment Plant Sludge Bed, and Caruthers Fire Hydrant Improvements), and four projects in incorporated cities (Fowler Panzak Park ADA Restroom, Kerman Stanislaus Avenue Park Development, Selma ADA Sidewalk Improvements, and Mendota Rojas Pierce Park Improvements).	
	• A total of 21 community meetings were held for discussion and needs assessment between 2020 and 2019. In addition, a public workshop was held to provide assistance on preparing applications and the funding process in 2020, 2019 and 2018. Notice for these activities was mailed to CSDs and community groups along with publication, website posting, and direct email response.	

Housing Element Program	Evaluation	Recommendation
	• In 2020, staff held various virtual meetings with the Fresno County Housing Authority and representatives of the Del Rey CSD to discuss potential deficiencies in infrastructure as impediments to additional residential development in the community and possible funding sources to address these infrastructure deficiencies.	
	• County staff disseminates information about other funding opportunities for CSDs, infrastructure and service expansions when they become available. The majority of funding available for infrastructure and service expansion focuses on urban areas.	
	• The County of Fresno regularly searches for funding opportunities to update community plans to attract developers to develop in unincorporated communities. In 2021, the County was awarded \$500,000 in Local Early Action Planning (LEAP) funds to conduct (in 2023) a feasibility study to form a local or reginal housing trust. The County was also awarded \$200,000 from FCOG for the creation of a guidance document that will result in a streamlined process that would expedite the updates of community plans in the future.	
7. Affordable Housing Incentives Continue to offer incentives to facilitate the development of 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. Examples include: gap financing, density bonus, streamlined processing (such as pre-application consultation to identify potential issues early on and concurrent processing of required permits to the extent feasible) Continue to seek partnerships and regularly meet, at least annually, with other agencies (such as the Fresno County Howing Authority) howing davalances community	 The County Zoning Ordinance includes a density bonus provision to facilitate the development of affordable housing. The County offers a pre-application process to identify potential project issues early in the process. The County also processes the required development applications concurrently as much as possible. These provisions are in place to facilitate the development of affordable housing for low and very low-income population, persons with special needs and seniors. The cooperation between the County and the cities within the County to address the housing needs at the regional level as well as the local level led to the collaboration between the County and twelve cities in preparation for a Multi-Jurisdictional Housing Element. 	This program will continue into the Sixth-Cycle Housing Element. It was successful as the County was able to construct, in its partner cities, eight new affordable housing developments and one acquisition and rehabilitation development resulting in over 400 new units and preservation of 124 units. This does not include the several hundred supportive housing units it also assisted in developing during the reporting period.
Housing Authority), housing developers, community	• The County continues its efforts to provide HOME funds as gap financing to develop new affordable housing	

Housing Element Program	Evaluation	Recommendation
 stakeholders and employers to discuss and pursue viable opportunities for providing affordable housing Monitor HCD and US Department of Housing and Community Development (HUD) websites at least semi-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 	 projects in the unincorporated county and its partner cities, as its Federal HOME funding permits. Recent examples are listed below. In 2020, the City of Kerman (Gateway Apartments) was awarded \$980,000 in County HOME funds for a 61-unit affordable housing project, and the City of Kingsburg (Linnaea Villas) was awarded \$1,000,000 in County HOME funds for a 47-unit affordable housing project, both of which were successful in receiving State Tax Credits. 	
 those at risk of homelessness. Continue to support and encourage other agencies and housing developers, such as the Fresno County Housing Authority and Self-Help Enterprises, in the application of funds, including State HCD and USDA Rural Development loans and grants and other funding sources that may become available. Continue current efforts to streamline and improve efficiencies in planning and permit approval and building inspection service. Establish to the extent feasible, a program that accommodates submittal and issuance of certain permits via the Internet by 2020. 	 In 2020, the County approved HOME funds to Self-Help Enterprises and Habitat for Humanity. One project was for the acquisition, construction, and sale of two single- family developments. Country Meadows II, developed by Habitat for Humanity, will build eight single-family residences for sale to eligible low- and moderate-income households in the community of Riverdale. Reedley Homeownership Project, developed by Self-Help Enterprises, built 10 single-family residences for sale to eligible low- and moderate-income households in the City of Reedley. In 2019, a 60-unit affordable housing project was completed in the City of Fowler using County HOME Investment Partnership Program (HOME) funds. The County was awarded a State Housing Preservation Grant (HPG), and funds were used in 2019 to assist eligible low-income homeowners in Fresno County who required 	
	 assistance for housing repairs and rehabilitation. The County completed one HOME-funded affordable housing project during 2018, which expanded the supply of affordable housing for lower-income households in the City of Sanger by 48 units. The County staff seeks partnerships and regularly meets with other agencies, housing developers, and community stakeholders to discuss and pursue viable opportunities to provide affordable housing. In 2022, 2021, and 2020, County staff hosted two housing for ums annually to inform developers of the opportunities for housing 	

Housing Element Program	Evaluation	Recommendation
	development in unincorporated communities. Local agricultural businesses and community services districts were also invited to these meetings.	
	• County staff monitors HCD and HUD websites for Notices of Funding Ability (NOFA) for developing affordable housing for lower-income households.	
	• Fresno County was awarded \$1.6 million from the HCD's Permanent Local Housing Allocation program and awarded \$1.5 million to the Esperanza Commons project to preserve 60 farmworker apartments in the City of Mendota.	
	• In 2020, the Department of Social Services applied to HCD for Homekey funds of \$13.5 million to provide homeless assistance. The Department of Behavioral Health partnered with the Fresno County Housing Authority to apply to HCD for the "No Place like Home" grant to provide housing including housing for the homeless or individuals with mental health disabilities. The County assisted in the purchase of a 200 unit-motel that housed homeless individuals during Covid, with the intent of converting the project to permanent housing. Crossroads Village when completed in 2024 will consist of 143 permanent housing units for individuals that are disabled or at risk of homelessness.	
	• The County Department of Behavioral Health (DBH) has been instrumental during the planning period in assisting in the development of various supportive housing developments such as: Parc Grove, a 40-unit supportive and veterans housing development built in 2018 in the City of Fresno; Alegre Commons, a 42-unit family supportive housing development built in 2022 in the City of Fresno; and Butterfly Gardens, the first supportive housing development in the City of Clovis, built in 2022 and providing 75 units for individuals that are disabled and at risk of homelessness.	
	• The County offers assistance to other agencies in accessing local, state, and federal funding for affordable housing. County Staff continues to support and encourage	

Housing Element Program	Evaluation	Recommendation
	its partner agencies, cities, and housing developers, such as the Fresno County Housing Authority and Self-Help Enterprises, in applying for funds, including HCD and USDA Rural Development loans and grants and other funding sources, to develop affordable housing in Fresno County. The County provided Willow Partners a letter of support for their Joe Serna Farmworker Grant application for a development in the City of Huron.	
	• The County continues its efforts to streamline and improve efficiencies in processing permits and building inspections. Currently, certain permit requests and requests for inspections can be submitted and processed online.	
8. Farmworker Housing Continue to seek partnerships and regularly meet, at least annually, with other agencies (such as the Fresno County Housing Authority), housing developers, community stakeholders, and agricultural employers/employees to discuss opportunities for farmworker housing. Contact agricultural stakeholders and the nonprofit developers annually to discuss viable options for locating suitable farmworker housing starting at the end of 2016. Continue to support and encourage other agencies and housing developers, such as the Fresno County Housing Authority and Self-Help Enterprises, in the application of funds for farmworker housing, including HCD and USDA Rural Development loans and grants and other funding sources that may become available.	 The County continues to seek partnerships with cities and other agencies to discuss opportunities for affordable housing development, including farmworker housing. The County will continue to support and encourage other agencies and housing developers, such as the Fresno County Housing Authority, Habitat for Humanity, and Self-Help Enterprises, in the application of funds for affordable housing development, including farmworker housing. In 2022, 2021, and 2020, the County of Fresno hosted two community housing forums annually to discuss housing issues in the agricultural communities. The County conducted a survey in 2021 to determine farmers' need for housing on their farmland. In 2022, a survey will be distributed to determine the housing needs of farmworkers. 	This program was successful and will continue into the Sixth-Cycle Housing Element.
Annually monitor the status of farmworker housing as part of the County's annual report to HCD on Housing Element progress and evaluate if County efforts are effective in facilitating the provision of farmworker housing. If appropriate, make necessary changes to enhance opportunities and incentives for farmworker housing development.	 In 2020, the County provided Willow Partners with a letter of support for their Joe Serna Farmworker Grant application for a development in the City of Huron. In 2020, the County approved HOME funds to Self-Help Enterprises and Habitat for Humanity. One project was for the acquisition, construction, and sale of two single-family developments. Country Meadows II, developed by Habitat for Humanity, will build eight single-family 	

Housing Element Program	Evaluation	Recommendation
	residences for sale to eligible low- and moderate-income households in the community of Riverdale.	
	• In 2018, the County issued nine permits for mobile homes to serve as farmworker housing in the very low- income (non-deed restricted) category, which is more than previous years. The County monitors the status of farmworker housing as part of the annual progress report.	
	• In 2021, County staff met with housing developers to identify areas of possible development in unincorporated communities. County Staff is working to facilitate a partnership between Self-Help Enterprises, Willow Partners, Habitat for Humanity Fresno County, and Fresno County Housing Authority to explore the possibility of building an affordable housing development in unincorporated communities such as Del Rey, Biola, and Riverdale, which include many lower-income residents and farmworkers.	
	• The County approved HOME funds to Self-Help Enterprises in the amount of \$535,000 and to Habitat for Humanity in the amount of \$450,00 for the acquisition, construction, and sale of two single-family developments. Both projects are currently under construction. Country Meadows 2, developed by Habitat for Humanity, will build eight single-family residences for sale to eligible low- and moderate-income households in the community of Riverdale. Reedley Homeownership Project, developed by Self-Help Enterprises, will build ten single- family residences for sale to eligible low- and moderate- income households in the City of Reedley. Both projects use USDA funds in the development of the projects.	
	 In November 2021, the County Awarded \$1.5 million of the County's Permanent Local Housing Allocation Funds (PLHA) to the Mendota Esperanza Commons LP to preserve 60 farmworker housing units in the City of Mendota. 	
9. Preserving Assisted Housing	• The County monitors housing units that become at risk of being converted to market-rate housing and works with	This program will continue into the Sixth-Cycle Housing Element, but

Housing Element Program	Evaluation	Recommendation
Continue to monitor status of affordable housing projects. If projects become at risk of converting to market-rate housing: 1. Monitor the status of any Notice of Intent and Plan of Action filed by property owners to convert to market-rate units 2. Identify nonprofit organizations as potential purchasers/managers of at-risk housing units 3. Explore funding sources available to purchase affordability covenants on at-risk projects, transfer ownership of at-risk projects to public or nonprofit agencies, purchase existing buildings to replace at-risk units, or construct replacement units 4. 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 non-profit organizations to explore funding sources to acquire such units to keep the units affordable for the low and very low-income population. The County provides notice and informs tenants of their rights and eligibility to obtain special Section 8 vouchers reserved for tenants of converted HUD properties. The Fresno County Housing Authority manages, monitors, improves, and creates assisted housing in the unincorporated county. If any residents call requesting rental assistance, Housing Authority staff explains the benefits of Housing Choice Vouchers (Section 8) and provides information on obtaining such a voucher through the Housing Authority. Aside from the Brown Dairy onsite farmworker housing, no affordable housing rental projects in the unincorporated county were considered at risk of converting to market-rate housing. The owner/operator indicated that the affordable farmworker housing would remain as long as the dairy was in operation. 	will be modified to be more proactive, consistent with changes in state law.
 10. Zoning Code Amendments Consider establishing a discretionary permit requirement for new agricultural operations in residential zones and addressing farm labor housing in those zones in a similar manner. Address the provision of Single Room Occupancy (SRO) housing as part of the comprehensive Zoning Ordinance update in 2016. Examine, in 2016, alternatives to requiring discretionary approval for the development of multi-family housing in the C-4 Zone District and adopt appropriate actions to expedite the review and processing of multi-family housing development applications. Complete comprehensive Zoning Ordinance update in 2017 to address the density bonus provisions, increase the allowable density at R-2, R-2A, R-3, R-3A, R-4, C-4 and R-P to 20 units per acre. 	 In 2022, AT No.381 was approved by the Board of Supervisors to address farmworker and employee housing, allowing greater compliance with state law. Also in 2022, Public Works and Planning staff processed two text amendments to the Fresno County Zoning Ordinance to bring the document into greater compliance with state law. First on May 17, 2022, the Board of Supervisors approved AT No. 381 to amend Zoning Ordinance sections related to employee and farmworker housing allowing for greater compliance with state law and to address litigation stemming from the Fifth-Cycle Housing Element. On August 23, 2022, the Board of Supervisors approved AT No. 383 to amend Zoning Ordinance sections associated with reasonable accommodations, density bonus, and supportive housing. In residential zones where limited agricultural uses are allowed, employee housing including farmworker housing, is permitted as a single-family residence. 	This Program was implemented but will continue into the Sixth-Cycle Housing Element, updated to ensure the County continues to monitor and ensure consistency with changes in state law.

Housing Element Program	Evaluation	Recommendation
	• Amendments were approved to the Zoning Ordinance in 2020 that included the provisions of Single Room Occupancy. This program has been implemented.	
	• Amendments were approved to the Zoning Ordinance in 2020 that included development of multi-family housing development in the C-4 Zone District without a discretionary permit. This program has been implemented.	
	• Amendments to Zoning Ordinance were approved by the Board of Supervisors in 2020 to include density bonus provisions and increase density in R-2, R-2A, R-3, R3A, R-4, C-4, and R-P to 20 units per acre. This program has been implemented.	
11. Monitoring of Planning and Development Fees Should the Board decide to reinstate impact fees, monitor the fees annually to ensure they do not unduly constrain housing development.	• In 2018, the Board of Supervisors conducted a public hearing to consider an amendment to the County Ordinance for Public Facilities Impact Fees and decided to continue the suspension of the impact fees until further notice.	This program will continue into the Sixth-Cycle Housing Element so that an evaluation of potential housing constraints is conducted as part of and annually thereafter impact fees are reinstated.
12. Housing Assistance Rehabilitation Program (HARP) Provide rehabilitation assistance to households in the unincorporated county as federal funding is available and applications are received.	 The County continues to market HARP to all unincorporated county homeowners and continues to meet with community groups to provide information on the program. In 2022, Fresno County received some applications from possible qualified applicants for HARP loans in the unincorporated county during the 2022 calendar year, applications are still in the review process to determine if funds will be awarded. Fresno County also applied and was awarded \$200,000 for the USDA Housing Preservation Grant. Grant funds will provide financial assistance to low and very low-income residents with home rehabilitation. It is anticipated that these funds will be utilized in 2023-2025. In 2021, Fresno County did not receive applications from qualified applicants for HARP loans in the unincorporated county. 	This program will continue into the Sixth-Cycle Housing Element under one consolidated Housing Rehabilitation Program for ownership and rental housing. HARP was underutilized and the County is exploring tapping into Permanent Local Housing Allocation (PLHA) funds to expand awareness and to create a minor rehabilitation program that distributes the funds as grants instead of loans. A grant program will eliminate many of the current barriers that have not allowed the residents to qualify for the federally funded programs during the Fifth-Cycle Housing Element.

Housing Element Program	Evaluation	Recommendation	
	• In 2020, Fresno County provided two HARP loans to qualified households in the unincorporated county.		
	• In 2019, Fresno County provided three HARP loans to moderate-income households in the unincorporated county.		
	• In 2018, Fresno County provided one HARP loan to one very low-income household in the unincorporated county.		
	• In 2017, Fresno County provided a HARP loan to one very low-income household in the unincorporated county during 2017. The County provided two HARP loans to one extremely low-income household and one very low-income household in participating cities.		
	• In 2016, Fresno County provided HARP loans to five low-income households in the unincorporated county.		
13. Rental Rehabilitation Program (RRP)Provide assistance for the rehabilitation of four rental housing units during the planning period.	 Fresno County did not provide any Rental Rehabilitation Program loans for housing rehabilitation projects in the unincorporated county in 2021, 2020, 2019, or 2017. In 2018, the County provided one loan for housing in a partner city. The County continues to market the Rental Rehabilitation Program to eligible rental property owners. In 2016, one single-family rehabilitation project was completed initially as a rental; however, the low-income owner decided to move into it as an owner occupant rather than rent it to a low-income tenant, so it resulted in a HARP loan project instead. 	This program will continue into the Sixth-Cycle Housing Element under one consolidated Housing Rehabilitation Program for ownership and rental housing. The RRP was not utilized in the unincorporated county, which predominantly consists of ownership housing. The County intends to adjust the current program by focusing coordination with the Fresno County Housing Authority to target and find landlords that are or	
		are willing to be in the Housing Choice Voucher Program. Additionally, the County has expanded its code enforcement efforts and will be educating the new staff on the program to receive additional referrals during the Sixth-Cycle Housing Element	

Housing Element Program	Evaluation	Recommendation
14. Code Enforcement Continue to enforce property maintenance standards and abate substandard structures through Code Enforcement and various housing rehabilitation programs.	• County staff receives over 100 complaints annually and investigates violations of property maintenance standards when necessary and encourages property owners to seek assistance through available housing rehabilitation programs to abate building code violations.	This program will continue into the Sixth-Cycle Housing Element. During the next planning cycle, the County is going to be exploring updating their Code Enforcement codes and increasing coordination between the County's Department of Public Works and Planning and the Department of Public Health.
15. Homebuyer Assistance Program (HAP) Provide assistance to income eligible households to purchase a home in the unincorporated county as federal funding is available and applications are received.	 The County continues to market HAP to eligible first-time homebuyers and works closely with lenders and the real estate community to ensure the program is made available whenever possible to qualified applicants. In 2022, the County provided funding for the purchase of 10 homes in Reedley through an Affordable Housing Development loan to Self-Help Enterprises. Additionally, the County is in process of constructing an additional eight single-family homes in the community of Riverdale developed by Habitat for Humanity Fresno County. The Habitat project is expected to be completed in 2023. The County did not provide any HAP loans in 2021, 2020, and 2019. In 2018, the County provided two HAP loans to very low-income homebuyers to purchase homes in the unincorporated county. An additional four HAP loans were made (one low-income homebuyers) for home purchases in participating cities during this period. In 2017, the County provided HAP loans to two low-income homebuyers to purchase a home in the unincorporated county during 2017. An additional two HAP loans were made (one very low-income homebuyers to purchase a home in the unincorporated county during 2017. An additional two HAP loans were made (one low-income homebuyer) for purchases in participating cities during this period. In 2016, the County did not provide any HAP loans to eligible homebuyers to purchase a home in the 	This program will continue into the Sixth-Cycle Housing Element, though it will be renamed the Homeownership Program. Due to the rapid increase in sales costs and the low federal sales price limits the Homebuyer Assistance Program was not able to assist many low-income residents during the Fifth-Cycle Housing Element as it had in the past. The County intents to change the program guidelines to increase the amount of assistance allowed and possibly request from HUD an exception to the maximum sales price limits to allow the funds to be utilized. The County intends to have the changes implemented within the first two years of the Sixth-Cycle Housing Element.

Table 1A-35	: Evaluation	of 2015-2023	Housing	Element,	Fresno	County
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Housing Element Program	Evaluation	Recommendation	
	unincorporated county during 2016. HAPs were only made for purchases in participating cities in this period.		
16. First-Time Homebuyer ResourcesPromote available homebuyer resources on County website and public counters by 2016.Annually review funding resources available at the state and federal levels and pursue as appropriate to provide homebuyer assistance.	 The County continues to provide information on its Homebuyer Assistance Program to first-time homebuyers via flyers and its website, and through meetings with lenders, realtors, and community groups, to ensure the program is made available whenever possible to qualified applicants. The County continues to review funding resources available from the state and federal government to obtain funds to provide homebuyer assistance. 	This program will continue into the Sixth-Cycle Housing Element.	
 17. Housing Choice Voucher (HCV) Rental Assistance Continue to refer interested households and homeowners to the Fresno County Housing Authority and encourage landlords to register their properties with the Housing Authority for accepting HCVs. Work with the Fresno County Housing Authority to disseminate information on incentives for participating in the HCV program throughout the county areas with varying income levels to promote housing opportunities for all unincorporated community residents. Continue to support and encourage the provision of vouchers to qualifying Fresno County households. 	 The County continues to refer interested households and homeowners to the Fresno County Housing Authority and encourages landowners to register their properties for accepting Housing Voucher Rental Assistance. The County supports the efforts of the Fresno County Housing Authority for offering Section 8 and other rental assistance programs in the unincorporated county. The County reviews and certifies the Housing Authority's five-year and annual plans for consistency with the County's Consolidated Plan. The County does not provide rental assistance directly but does assist the Housing Authority in publicizing the opening of the Section 8/Housing Choice Voucher waiting list by disseminating the information to County partners/clients. Per the Fresno County Housing Authority (2023), 2,687 landlords in the county accept Housing Choice Vouchers and the Housing Authority can provide up to 13,228 Housing Choice Vouchers to low-income individuals and families. Note that vouchers allocated to the County may be used anywhere in the county (city or unincorporated county). Data was available by zip code. With the possible exception of the City of Fresno, it is assumed that very few, if any, vouchers reported by the Housing Authority to be used in a zip code associated with a city were used in an unincorporated area, as the 	This program will continue into the Sixth-Cycle Housing Element. The County has committed to work with the Fresno County Housing Authority during the Sixth-Cycle Housing Element to focus additional outreach efforts to educate residents in areas of high segregation and poverty and recruit additional landlords to join the program located in RCAA communities. Additionally, the County will explore applications for funding that can provide landlord incentives in increase participation in the program.	

Housing Element Program	Evaluation	Recommendation
	housing stock (particularly rental) in any given zip code is primarily within incorporated city boundaries. The community of Pinedale is tracked and listed as a distinct community by the Housing Authority, but this area is neither a separate city nor an unincorporated community; the area was annexed into the City of Fresno in 1978. The breakdown by city/county/community is as listed below:	
	• Cities: vouchers allocated by HUD: 7,412; vouchers utilized (approximate): 6,775	
	• County: vouchers allocated by HUD: 5,816; vouchers utilized (approximate): 5,366	
	 Landlords in unincorporated communities: Auberry (1), Biola (2), Caruthers (4), Del Rey (2), Raisin City (2), Riverdale (4), Tranquillity (2), Squaw Valley (1) 	
	 Vouchers used in unincorporated communities: Auberry (1), Biola (3), Caruthers (4), Del Rey (2), Raisin City (2), Riverdale (9), Tranquillity (2), Squaw Valley (3) 	
 18. Energy Conservation Continue to promote and implement the County's Go Green initiatives. Consider inclusion of design standards for new development that encourage alternative transportation (for example, bicycle lanes, bus turnouts, and direct pedestrian connections to transit lines) as a part of the update of the County Zoning Ordinance to conserve energy and improve air quality. 	• The County makes every effort to incorporate "green building" and energy-efficient components in housing being rehabilitated when practical and acceptable to the client. The County's rehabilitation standards adhere to the HOME Program requirements to ensure the longevity of the major components of the home and improve the energy efficiency as much as possible. The County promotes design standards for new developments that encourage alternative transportation modes such as walking and riding bicycles to encourage physical	This program will continue into the Sixth-Cycle Housing Element. The County intends to include new actions related to improving accessibility and safety on roads and streets to enhance the County efforts on addressing energy and climate issues.
Continue to promote and support Pacific Gas and Electric Company programs that provide energy efficiency rebates for qualifying energy-efficient upgrades.	 activities and improve air quality. The County continues to promote and support Pacific Gas and Electric Company programs that provide energy- efficiency rebates for qualifying energy-efficient 	
Continue to incorporate conservation measures in housing rehabilitation programs.	upgrades.	
Expedite review and approval of residential alternative energy devices.	• The County has expedited review and approval of residential alternative energy devices.	

Housing Element Program	Evaluation	Recommendation
 19. Fair Housing Conduct outreach and education workshops at least annually and on an on-going basis for lenders, real estate professionals, housing providers, community stakeholders, and the community at large. Provide information and written materials on fair housing rights, available services, and responsible agencies in English and Spanish. Place materials at County libraries, Community Services Districts offices, and public counters, and on the County's website by 2016. Refer fair housing complaints to HUD, State Department of Fair Employment and Housing (DEFH), Fair Housing Council of Central California (FHC-CC), and other housing agencies. Conduct Fair Housing Assessment as required by HUD on a regular basis (every five years). 	 The County continues to provide information to the County libraries, Community Services District offices, partner cities, and at public counters throughout various County offices. The County provides flyers, referrals, and education to the residents of Fresno County utilizing various vehicles. In 2022, The County conducted two community educational workshops for residents and discussed this issue at the two annual housing meetings, including the one with developers. Additionally, County staff was a guest speaker on the radio show "Fair Housing is the Law" to discuss housing issues in Fresno County. In 2020, County staff hosted two virtual meetings attended by affordable housing developers and community stakeholders. Both meetings discussed fair housing rights, impediments to fair housing and served as a forum to discuss resolutions to the difficulty in affordable housing speaker on a regional radio program that included discussion of housing issues and answering 	This program will continue into the Sixth-Cycle Housing Element. During the Sixth-Cycle Housing Element, the County expected to award CDBG funds to the Fair Housing Council of Central California to expand the program to: conduct fair housing training to community-based organizations, County staff and property management companies. The County is expanding other and adding new programs to address affirmatively furthering fair housing.
	 questions from the community. The County mailed over 10,236 flyers to various residents throughout the County and its partner cities. In 2019, three outreach and education workshops were conducted on fair housing for lenders, real estate professionals, housing providers, community stakeholders and the community at large. The County also held 18 community meetings and 31 outreach activities to discuss impediments to fair housing as part of the Fair Housing Assessment process. The County mailed over 9,114 flyers to various residents throughout the County and its partner cities. In 2018, two outreach and education workshops were conducted on fair housing for lenders, real estate professionals, housing providers, community stakeholders and the community at large. County staff served as a guest speaker on the local fair housing radio program "Fair Housing is the Law" twice, educating 	

Housing Element Program	Evaluation	Recommendation
	County residents about their rights and the various Fresno County affordable housing programs. The County mailed over 3,677 flyers to various residents throughout the County and its partner cities.	
	• In 2017, nine outreach and education workshops were conducted on fair housing for lenders, real estate professionals, housing providers, community stakeholders and the community at large.	
	• In 2016, five outreach and education workshops were conducted on fair housing for lenders, real estate professionals, housing providers, community stakeholders, and the community at large.	
	• Fair housing complaints are reported to HUD, State Department of Fair Employment and Housing (DEFH), FHC-CC, and other housing agencies. No fair housing complaints were received 2016–2022.	

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.

Table 1A-36 shows assisted housing units in the unincorporated county. There are 331 assisted affordable units in the unincorporated county, of which 62 are preserved in perpetuity, 260 are restricted through at least 2059, and only nine are potentially at risk of expiring (2031) in the next 10 years. The County has included Program 17 to maintain contact with owners of at-risk units as the use restriction expiration date approaches. The County 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.

The nine, two-bedroom affordable housing units at Brown Dairy were funded by a USDA Rural Development Section 515 1% loan, placed into service on January 19, 1983. These units are dedicated to onsite workers and their families. The Brown Dairy and onsite housing is roughly one mile from primary and high schools, a supermarket, and other shops and services in central Riverdale. The dairy owner/operator confirmed that the two-bedroom units are being used by workers and their families and are charged (as of May 2023) a monthly rent of \$500, which is affordable to households of three or more people earning extremely low-income.

The California Housing Partnership lists a potential conversion date of November 4, 2027, while the USDA indicates that the restrictive clause terminates in 2031. The dairy owner/operator indicated that the housing units are exclusively for workers and will be reserved at affordable rents in perpetuity—even after the Section 515 loans are extinguished—as long as the dairy continues to operate. Based on this information, the Brown Dairy units are considered to be at a very low risk of converting.

However, as the units are not legally restricted beyond 2033, the following at-risk analysis is presented as required by state law. As previously described in Chapter 2, Housing Needs Assessment, there are three methods to preserve at-risk units: acquisition and rehabilitation, replacement, or a rent subsidy.

Project	Total Units	Affordable Units/Mix	Funding Source	Earliest Termination Date	Risk Level			
BIOLA								
Biola Apartments 4955 North 7 th Ave.	12	12 1- to 4-bd	 Fresno County Housing Authority 	In perpetuity	Not at risk			
Biola Village 4692 Third St.	44	44 total 18, 2-bd 22, 3-bd 4, 4-bd	 Federal/State LIHTC, Alliant Capital L.P. State of California HCD Multifamily Housing Program State of California HCD Serna Program County of Fresno HOME Program Neighborworks America 	2062	Not at risk			
DEL REY				•				
Del Rey Apartments 5622 South Oak Lane Ave.	30	30 Mix N/A	• Fresno County Housing Authority	In perpetuity	Not at risk			
Villa Del Rey 10563 E. Jefferson	48	48, total 18, 2-bd 24, 3-bd 6, 4-bd	 Federal/State LIHTC, Alliant Capital L.P. USDA-RD Section 515 100% Rental Assistance State of California HCD Serna Program County of Fresno HOME Program Neighborworks America 	2059	Not at risk			
LATON								
Laton Apartments 6701 East Latonia St.	20	20 Mix N/A	 Fresno County Housing Authority 	In perpetuity	Not at risk			
RIVERDALE								
Fresno 2007 Portfolio 21424 S. Mark Ave.	172	168, total 108, 1-bd 58, 2-bd 6, 3-bd	USDA-RD Section 515 Rural Development Rental Assistance LIHTC		Not at risk			
Brown Dairy (onsite worker) 22045 S Valentine Ave.	9	9, 2-bd	• USDA-RD Section 515	2027 or 2031	Very low			
Total	335	331						

Table 1A-36: Assisted Housing Developments, Fresno County

Source: County of Fresno and California Housing Partnership, 2022.

Acquisition and Rehabilitation

As the Brown Dairy units are directly on the property of an active dairy farm, acquisition and rehabilitation of the units is not a viable method of preservation. The affordable units cover two acres of land toward the middle of dairy farm's 112-acre property, which includes many other buildings and operations, and the property owner is uninterested in subdividing the land in any manner.

Replacement (New Construction)

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). Fortunately, comparable land and development was available to estimate replacement costs. In terms of land, a 100-acre dairy site is currently (July 2023) for sale roughly six miles to the east in Laton, with an asking price of \$2.5 million or \$25,000 per acre. The closest comparable land for sale, in terms of size and rural setting, is found just outside the City of Coalinga, with a parcel size of 10 acres and an asking price of \$225,000 per acre. Although many of the nearby parcels are large, if an entity could convince property owners to subdivide and sell off part of their property, the land cost could be as little as \$45,000 or as much as \$225,000 to acquire a larger parcel.

The Willow Heights Affordable Apartments are currently being proposed by Willow Partners in the Riverdale community and provide a valid comparable in terms of construction costs. Although the average cost of those units has not yet been determined, Willow Partners also built a 61-unit affordable family apartment complex in Kerman (Gateway Villas) in 2020, at an average cost of \$100 per square foot or \$243,000 per unit, including \$22,131 per unit in land costs for the 4.4-acre property. After applying the same assumptions, an estimated cost to replace the nine Brown Dairy units with new construction elsewhere calculates out to \$2,187,000.

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 described previously. Under HCVs, the United States Department of Housing and Urban Development (HUD) pays the difference between what tenants can pay (defined as 30% of household income) and what HUD estimates as the fair-market rent on the unit. 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. Based on discussions with the Brown Dairy owner/operator, however, the current monthly rent for the two-bedroom units is only \$500 (\$6,000 per year). Per the "Ability to Pay" analysis (Table 2-24 in Section 2), the maximum monthly rent for a three-person extremely low-income household is \$576. Accordingly, a rental subsidy is currently unnecessary given that the current rents are below the maximum affordable rent levels for the lowest income category. Should the dairy owner/operator opt to formalize and restrict the affordability of the units for a

set number of years, a 20-year subsidy of the entire current monthly rent (\$500) for all nine units would be approximately \$120,000 per unit or \$1.08 million in total.

Conclusion

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

Program Efforts to Preserve At-Risk Units

The County has included Program 17 to maintain contact with owners of at-risk units as the use restriction expiration dates approach. The County 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.

Preservation Resources

When affordable housing units have the potential to convert to market rate, due typically to the expiration of an affordable housing agreement or expiration of funding, there is a risk that tenants in those affordable units will be displaced. Certain companies and organizations can be certified as eligible to purchase buildings where a federally assisted mortgage is due to be prepaid. Refer to **Section 2 – Housing Needs Assessment** of the Regional Housing Element for preservation resources.

SECTION 1A-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 County of Fresno 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 the Planning Commission and Board of Supervisors
- Community Workshops
- Community Survey

Regional efforts included community workshops, consultations, and a community survey, all of which are discussed in detail in **Section 1 – Public Outreach and Engagement** of the Regional Housing Element.

Planning Commission/Board of Supervisors Study Sessions

On September 15 and 20, 2022, Study Sessions were 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 the required contents of the element, discussed early strategies and possible sites to meet the County's RHNA, reviewed new state laws, and solicited feedback from the Board of Supervisors, Planning Commission, and community members on these strategies and other housing needs in the unincorporated county. The primary topic of concern was about water supply and the County's ability to accommodate its RHNA. No comments or questions were received during the study session.

Community Workshops

Round 1 Workshops

The first round of workshops was held as follows:

- September 19, 2022, in Laton, from 6:00 to 7:30 pm
- October 3, 2022, in Del Rey, from 6:00 to 7:30 pm
- October 12, 2022, as a virtual workshop via Zoom, from 5:30 to 7:00 pm



To invite the community to the event, the following outreach efforts were conducted:

- Flyers in English and Spanish were distributed to residents and stakeholders via or through:
 - Fresno COG email list and a list of regional stakeholders and CBOs
 - Fresno County email list of 200+ interested stakeholders, CBOs, and residents
 - Fresno County Facebook Page and other social media outreach efforts
 - Various water districts throughout the county (to customers/residents)
 - Fresno County Housing Authority (to affordable housing residents)
 - Laton School District (to all parents)
 - Del Rey School District (to all parents)
 - Del Rey residents (door-to-door)
 - Leadership Counsel for Justice and Accountability (to Cantua Creek, Tomb Stone, and Lanare residents)

• Eventbrite registration pages were created in both English and Spanish along with a Facebook event. The Eventbrite and Facebook pages advertised that we would provide Spanish language interpretation, refreshments, and activities for kids.

In the presentation, members of the public were introduced to the process of developing the Housing Element both for the region and for the County of Fresno. They were also given information about current housing conditions in the region and across the various unincorporated communities 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 developments 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?

Sixty community members attended the first round of workshops, with roughly half of the attendees communicating exclusively or primarily in Spanish. Interpretation services were provided by County staff and Linguistica. Participants expressed concerns about infrastructure, a lack of housing options, water supply, and buffering from industrial uses.

The County held an additional eight meetings in 2023 after the Housing Element workshops as part of the General Plan Update during which comments regarding programs for the Housing Element were also received.

Round 2 Workshops

The second round of workshops was held during the 30-day public review period of the Draft Housing Element as follows:

- September 7, 2023, in Caruthers, from 6:00 to 7:30 pm (concurrently on Zoom)
- September 12, 2023, in Laton, from 6:00 to 7:30 pm
- September 26, 2023, in Tranquillity, from 3:00 to 4:30 pm (concurrently on Zoom)
- September 27, 2023, in Fig Garden and Riverdale, from 6:00 to 7:30 pm (concurrently on Zoom)

To invite the community to the event, the following outreach efforts were conducted:

- Flyers in English and Spanish were distributed to residents and stakeholders via or through:
 - Fresno County email list of 200+ interested stakeholders, CBOs, and residents

- Fresno County Facebook Page and other social media outreach efforts
- Various water districts throughout the county (to customers/residents)
- Fresno County Housing Authority (to affordable housing residents)
- Flyers at businesses in Biola, Caruthers, Fresno, Riverdale, and Tranquillity
- Schools in Laton, Tranquillity, and Caruthers
- Leadership Counsel for Justice and Accountability (to Cantua Creek, Tomb Stone, and Lanare residents)

In the presentation, members of the public were provided an overview of the County's Draft Housing Element, with a focus on the programmatic changes and commitments. A total of 64 community members attended the second round of workshops, with a handful of attendees communicating exclusively or primarily in Spanish. Interpretation services were provided by County staff. The community members expressed the need for affordable housing and low income housing, accessible and clean water (concern for wells drying out and help to offset the cost of replacing a dried well), aging infrastructure, deteriorating roads and sidewalks, and concern on how RHNA site selections were made. Community members expressed interest in ADUs and muti-family housing, and programs to help with house repairs and buying a home.



Annual Housing Forums

The County hosted its annual housing forums meeting to engage with developers and the public on the housing needs of Fresno County, fair housing, funding available for developers, partnership opportunities, and housing resources available to both the public and development community. Both forums are open to everyone. During the preparation of this Housing Element, the forum for the general public was held on October 27, 2022, both at the Fresno County Caruthers Branch Library and online via Zoom, from 5:30 to 7:00 pm. Discussion and comments revolved around homelessness, County programs for residents, and the Housing Element. The forum for the development community was held on November 1, 2022, both at the County and online via Zoom, from 3:30 to 4:30 pm.

The 2023 Annual Housing Forum for the residents was held on November 7, 2023, from 5:30 - 7:30 pm both at the Malaga Community Center and online via zoom. The Annual Developer Forum was held on December 7, 2023, both at the Plaza Building and online via zoom. An overview of the draft housing element and various programs was presented at both meetings. Discussion and comments at the annual meetings revolved around infrastructure, funding resources, and appropriate development site characteristics.



Stakeholder Interviews

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 Kerman and throughout the Fresno County area. Summaries of their responses are 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. 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 is not 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 jurisdictions 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 with increasing costs, but not enough. A lack of local water access is also a barrier to development. Mr. Prandini 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 are not 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 do not 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 eight 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 higherdensity projects to spread out the cost of infrastructure among a larger number of units. Demand is not 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 is less of an issue in closer communities like Sanger, Reedley, Kingsburg, Fowler, and Kerman. Coalinga 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 County Housing Authority has some, but they are limited.

Fair Housing of Central California

A representative of Fair Housing of Central California (FHC-CC) was interviewed on September 27, 2022. The organization works to eliminate housing discrimination and expand housing opportunities to all persons. The FHC-CC receives fair housing complaints and tracks them 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 (FMCoC), Laura Moreno was interviewed in October 2022. Ms. Moreno is a program manager for Fresno County's Department of Social Services (DSS). The FMCoC 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 has 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 is not 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 is not 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 will not be solved with suburban or exurban single-family dwelling units. There is 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, the 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 in 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 is not 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 region-wide stakeholder focus groups held in October and November 2022, a collection of members from the Llaves de tu Casa Iniciativa (LCI) 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.

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

Leadership Counsel for Justice and Accountability

Staff interviewed Leadership Counsel for Justice and Accountability (LCJA) on August 26, 2022, to discuss and hear shared insights on the experiences of residents and builders in the unincorporated county. LCJA noted several key barriers to development and fair housing, including: a shortage of funding for both housing and programs to support current residents, concerns about the lack of availability of water and wastewater infrastructure, and housing conditions.

LCJA noted that due to limited zoning to permit multifamily housing, there is a shortage of these units, which are typically more affordable, in most unincorporated communities. Further, as the existing housing stock ages, housing conditions have become a greater concern, with many lower-income households living in units without adequate heating or cooling systems, or tenants in buildings without interior renovations to for suitable living conditions. LCJA noted that in some cases, older mobile home units were not correctly permitted, and now current tenants are unable to complete necessary upgrades. As a result of these conditions, LCJA recommended the County seek additional funding for rehabilitation of ownership and rental units and establish a process to work with owners of mobile homes that need to be brought into compliance.

Overall, the shortage of housing, particularly affordable units, was reported to impact all households, but particularly farmworkers, seniors, and persons with disabilities. LCJA noted a shortage of homeownership units available and suitable for farmworkers, and a lack of supportive or accessible units for seniors and persons with disabilities overall throughout the unincorporated county, as most of these are located in incorporated jurisdictions. Due to the shortage of existing affordable units, and barriers to development, LCJA reported that there are high rates of overcrowding and residents living in substandard conditions. They expressed a need to increase the allowed residential density in most communities, but particularly the Tombstone area and Lanare where multifamily uses are not currently allowed.

The primary barrier to development that LCJA noted for the unincorporated county, besides funding, is the availability of water and wastewater infrastructure. LCJA noted one instance in which an application for an affordable project was denied in Riverdale due to water shortages. In other instances, lengthy negotiation processes between cities and the County regarding infrastructure has delayed projects, noting a need for a more streamlined process in these situations. While the drought that results in water shortages is outside of the control of the County, LCJA recommended streamlined processes to prioritize affordable development in areas where water is available, and to seek funding to support infrastructure needs in other areas.

Fresno County Housing Authority

Two representatives from the Fresno County Housing Authority, Doreen Eley, and Michael Duarte, were interviewed on January 11, 2023. The 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 wastewater capacity is a major concern. The Fresno County Housing Authority cannot 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 Fresno County 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 do not 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 in smaller cities. The representatives gave the example of a Homekey project in Huron that the Fresno County Housing Authority wanted to assist with, but there were no service providers available to serve the project.

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

The Fresno County 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 Rey and Lanare.

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

Tribal Consultation

The County conducted tribal consultation as part of its efforts to rezone and change the General Plan designations to expand capacity to accommodate the lower-income RHNA allocation. As of October 1, 2024, only the Santa Rosa Rancheria Tachi-Yokut Tribe requested consultation.

In September 2024 the County conducted a stakeholder interview with a representative of the Santa Rosa Rancheria Tachi-Yokut Tribe. The representative expressed an interest in having tribal consultation and related activities occur on future projects related to housing inventory sites in the Riverdale area. To address this, the County has included language in Program 14 to commit to requiring property owners or project applicants to conduct good-faith efforts in tribal consultation and implementation of appropriate measures as part of the process of developing any vacant sites listed in the inventory.

Summary of Public Comments

The County considered and incorporated public comments during the entire process of drafting of the Housing Element based on all of the outreach efforts summarized in the previous pages as well as the 30-day review period of the draft Element prior to submittal to HCD.

The following table identifies common concerns expressed during outreach efforts, the source(s) who expressed or shared the concerns, and the relevant program(s) that were changed and/or augmented based on the concerns.

Public Comment Category	Comment Source	Relevant Program(s)
Regional Collaboration		
Acute and chronic	Stakeholder Interviews	3: Collaborative Effort to Reduce
homelessness	(CVUI, FMCoC, FCHA, RICV)	Homelessness
Emergency, Supportive, and T	ransitional Housing	
Acute/chronic homelessness	Stakeholder Interviews (CVUI, FMCoC, RICV)	 3: Collaborative Effort to Reduce Homelessness 4: Homeless/Unhoused Needs 6: Permanent Supportive Housing 8: Housing Navigation and Linkage Services 9: Scattered Site Master Leasing Housing 10: Housing Coordination and Consultation 12: Youth Homelessness Prevention
Housing for vulnerable populations, especially seniors and persons with disabilities	Stakeholder Interviews (FHC-CC, LCJA, RICV)	11: Recovery Housing13: Seniors/Persons with Disabilities17: Affordable Housing Incentives18: Extremely Low Income Households
Adequate Sites		
More affordable and greater variety of housing, parcels zoned for multi-family	Community Workshops Stakeholder Interviews (BIA, CVUI, LCI, LCJA)	14: Adequate Sites17: Affordable Housing Incentives20: Zoning Ordinance Amendments33: Improving Housing Options
Water supply and availability	Community Workshops	16: Coordination of Infrastructure and Services
of sewer and water systems	Stakeholder Interviews (BIA, FCHA, LCJA)	
Affordable Housing Developme		
Incentives to create more affordable housing	Community Workshops Stakeholder Interviews (BIA, CVUI, LCI, LCJA)	17: Affordable Housing Incentives18: Extremely Low Income Households
Removal of Governmental Con		
Zoning changes to facilitate housing	Stakeholder Interviews (BIA, LCJA, LCI)	20: Zoning Ordinance Amendments 33: Improving Housing Options
Housing Quality	Construction in the Weight I and	7 D 0 D 1 C 1 1
Housing preservation and rehabilitation	Community Workshops Stakeholder Interviews (LCJA, RICV)	 7: Room & Board Support/Technical Assistance 19: Preservation of At-Risk Housing Units 23: Housing Preservation and Rehabilitation
Housing Assistance		
First-time homebuyer assistance	Community Workshops Stakeholder Interviews (BIA, CVUI)	25: Homeownership Assistance
Support for lower income households	Community Workshops Stakeholder Interviews (CVUI, FMCoC, PM, LCI, LCJA)	18: Extremely Low Income Households26: Housing Choice Voucher Rental Assistance27: Rental Assistance
Fair Housing		
Fair housing and discrimination concerns	Stakeholder Interviews (FHC-CC, LCJA)	29: Fair Housing Monitoring, Outreach
Farmworker housing	Community Workshops Stakeholder Interviews (<i>LCJA</i>)	19: Preservation of At-Risk Housing Units 35: Housing for Farmworkers

Table 1A-37: Summary of Public Comments and Affected Programs

Public Comment Category	Comment Source	Relevant Program(s)	
Abbreviations			
BIA: Building Industry Association of	of Fresno/Madera Counties		
CVUI: Central Valley Urban Institute			
FHC-CC: Fair Housing of Central California			
FMCoC: Fresno Madera Continuum	of Care		
LCJA: Leadership Counsel for Justic	e and Accountability		
LCI: Llaves de tu Casa Iniciativa			
PM: Patience Milrod, Law Office of			
RICV: Resources for Independence (Central Valley		

Table 1A-37: Summary of Public Comments and Affected Programs

Noticing of the Draft Housing Element

Per California Government Code Section 65585, the draft Housing Element was made available for public comment for at least 30 days, from September 1, 2023, through October 2, 2023. Public comment was received, and the County considered and incorporated public comments into the draft revision throughout October, November, and the first part of December (well over the mandated 10 days of internal review), before submitting to HCD on December 18, 2023. The draft was made available on the County'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 other stakeholders.

A revised draft was made available and distributed (in the same manner as the previous draft, including those who previously commented or requested notification) for a seven-day public review period from October 4 to October 11, 2024, before resubmitting it to HCD. One letter was received during the comment period. Revisions were made based on this letter and reissued for a seven-day public review period from December 13 to December 19, 2024. One letter was received during the comment period, but no new additional comments were included that necessitated changes to the Housing Element. Additional changes were made and distributed for a seven-day public review period from February 28 to March 6, 2025.

In total, six letters were submitted during the review periods from Leadership Counsel for Justice and Accountability (LJCA) (four letters), California Rural Legal Assistance (CRLA), and Self-Help Enterprises (SHE). The following provides a summary of the comments submitted alongside responses as appropriate from the County.

LCJA, October 2, 2023

Disparate impacts to a healthy living environment: LCJA requested that the County incorporate additional policies and programs to address the negative environmental and health impacts related to the placement and operation of industrial and agricultural uses, particularly in areas populated by people of color and specific communities of South-Central Fresno, Calwa, and Malaga. LCJA also requested that Program 2 (Review Annexation Standards in Memorandum of Understanding) be revised to commit to a minimum buffer between industrial development/zoned lands and residential neighborhoods. More specifically, LCJA requested the usage of urban greening as buffers and the

relocation of existing contaminating industries with significant impacts on nearby communities LCJA also requested that the County prohibit the rezoning of land for industrial uses within one-half mile of a disadvantaged community, the placement of industrial facilities next to neighborhoods in disadvantaged communities, and the passage of heavy duty truck traffic on residential streets (balanced by the establishment of designated truck routes that reduce neighborhood exposure). Finally, LCJA requested that the County establish funding to expand health-promoting amenities and collaborate with the San Joaquin Valley Unified Air District to develop and implement air pollution control measures.

County response: The County also received these comments from LCJA in response to the release of the draft General Plan Review and Zoning Ordinance update documents. The County's revised General Plan contains an Environmental Justice Element that contains new policies and implementation programs, as well as a revised Zoning Ordinance that includes new property development standards that address LCJA's comments. For example, Policies EJ-A.1 (Location of Sensitive Land Uses) and EJ-A.2 (Mitigate for Sensitive Land Uses Near Environmental Concerns), establish the location, buffering, and screening requirements to prevent (and mitigate where prevention is not possible) the impacts of new uses, especially when near disadvantaged communities. Policy EJ-A.3 (Use of Best Practice) directs new commercial and Industrial developments to utilize the latest technologies and best practices available to reduce pollutant emissions. Policies EJ-A.5 (Diesel Particulate Matter), EJ-A.6 (Caltrans Coordination), and EJ-A.7 (Air Pollution Control District) direct the County to seek funding and coordinate with agencies to encourage projects that mitigate roadway pollution, such as green barriers near existing uses, and the review of projects to verify the application of strategies outlined in the Community Emissions Reduction Program for the South-Central Fresno area. Policies EJ-A.12 (Industrial Development) and EJ-A.15 (Sensitive Receptor Setbacks) require new industrial development to design and incorporate appropriate buffering space/techniques to minimize impacts and, when within 500 feet of sources of diesel particulate matter, to conduct a health risk assessment and for the County to enforce measures identified in the assessment.

Development of the County's new policies, implementation programs, and property development standards were prepared in consultation with the State's Office of the Attorney General. A copy of the latest Environmental Justice Element can be found on the County's website.

The County Agricultural Commissioner is responsible for implementing and enforcing Pesticide Use Enforcement (PUE), a California regulatory program implemented to regulate, restrict, and ensure proper stewardship of registered pesticides. It is the Agricultural Commissioner's goal to protect people, animals, property, and the environment from exposure to harmful pesticides by the enforcement of all laws and regulations which provide appropriate, safe, and efficient use. As part of this goal, the Agricultural Commissioner utilizes public outreach, industry education, and advocacy for more sustainable pest management systems to protect the agricultural resources and environment of California in a manner that will result in the most significant benefit to all. Further, PUE activities help ensure the ongoing availability of pesticides essential to the protection of health and the safe production of food and fiber through the following actions:

- Proposal of alternative application methods.
- Adherence to mitigation procedures through added permit conditions.
- Issuance of site and time-specific permits.
- Routine, targeted, and consistent inspection procedures.
- Accurate documentation of non-compliance.
- Strong and equitable enforcement response.
- Seniors and persons with disabilities: LJCA requested that the County strengthen the level of commitment and detail for Program 13 (Seniors/Persons with Disabilities), including the listing of specific community organizations identified as partners.

County response: The County augmented Program 13 to commit to reflect the following. The County of Fresno has contacted the Del Rey Community Services District which has the only senior center on the valley floor and has agreed to work together and identify resources that the County can offer the seniors in the community. Additionally, the County has been in contact with the Fresno Madera Agency on Aging and have agreed to partner and identify ways to inform the rural residents of their services.

 Water and wastewater infrastructure: LJCA requested that the County strengthen its actions under Program 16 to improve and expand water and wastewater systems for existing disadvantaged communities.

County response: The County's revised General Plan contains an Environmental Justice Element that contains the following policies and implementation program that address LCJA's comments.

Policy EJ-A.10 Safe Drinking Water. Annually, the County shall coordinate a meeting with community water and sewer providers to identify system upgrade, expansion, and consolidation of funding opportunities to ensure all community members have access to safe drinking water and wastewater services.

Policy EJ-A.11 Prioritization of Improvement and Programs. The County shall give priority to disadvantaged communities when seeking infrastructure and active transportation funding opportunities.

Program EJ-A.H. Annually, the County shall develop a list of viable infrastructure and active transportation improvement projects for its disadvantaged communities and shall seek available grant funding.

 Housing preservation and rehabilitation: LJCA requested that the County secure additional funding to supplement federal sources (e.g., HOME) to enhance the feasibility of Program 23 (Housing Preservation and Rehabilitation).

County response: The County has not denied an owner-occupied rehabilitation request in the past due to limited funding availability. Most families that are not funded are due to the families not

submitting the required eligibility documentation, or failure to meet other program requirements (equity, ownership / title, legal residency, collections / bankruptcy, etc.). However, the County continuously explores other state and federal funding sources other than the HOME and CDBG program when possible and the County augmented Program 23 to commit to applying for at least one grant during the cycle and/or modifying an existing grant to dedicate funds for this purpose.

Code enforcement: LJCA requested that the County strengthen its objectives to allocate funding to hire additional staff to be able to keep up with the number of complaints received each year and ensure a faster response rate. LCJA also requested that the County facilitate community cleanup efforts and commit not to issue citations for code violations while inspecting installations pursuant to the Community Benefit Fund (associated with the Northpointe Settlement Agreement between the City of Fresno, LCJA, G4 Enterprises, and South Fresno Community Alliance) or other community-funded projects and/or to fund the resolution of these violations.

County response: On May 17, 2022 (Agenda Item No. 16), the BOS added five additional staff positions to the County's code enforcement unit. This action also included funding for necessary vehicles and equipment. This action resulted in an annual increase of \$1.3 million in funding to the Department. The County, through its Exclusive Service Area Program (ESAP) requires unincorporated waste haulers to host one community clean-up event annually for all customers in their service area. The County also offers unincorporated residents who are not ESAP customers an annual voucher worth up to \$40 for disposal costs of bulky items at the County owned American Avenue Landfill. Regarding the request for the County to overlook code violations, the County is obligated to address code violations when brought to its attention by the public or when discovered by County employees during the normal course of its duties. Even violations that might appear to be minor can pose a significant hazard to health and safety for occupants, neighbors, and the surrounding community. When onsite, if County Inspectors observe code violation(s) that present a health and safety issue, they are obligated to address the matter. County staff cannot ignore health and safety violations which exist on the property.

- Energy conservation: LJCA requested that the County prioritize weatherization and other improvements for mobile homes include improvements related to green spaces, bicycle facilities, and pedestrian facilities into more existing communities in Program 28 (Energy Conservation).
- County response: Program 32 seeks to improve accessibility and safety on roads and streets throughout the County. In 2022, the County applied for a grant to make sidewalk improvements in Cantua Creek and El Porvenir but was not awarded the funds. The County has stated that an objective of this program is to continue to apply for funding and improve transit connectivity and safety, especially in disadvantaged communities such as Cantua Creek, El Porvenir, Lanare and Tombstone.

Weatherization and mobile home improvements are eligible activities in the current rehabilitation program that the County administers. The County augmented Program 28 to commit to applying for at least one grant and identifying other grants such as CalHOME that allows the rehabilitation of mobile homes in mobile home parks that is not allowed through the HOME Program.

Reducing minimum site criteria for onsite wastewater treatment: LJCA requested that the County reduce its two-acre minimum lot size to enable more residents to build additional units on their property as part of Program 33 (Improving Housing Options).

County response: The County's state mandated and approved (Regional Water Quality Control Board) 2017 Local Area Management Program (LAMP) establishes standards to ensure adequate distance is maintained between the onsite wastewater treatment dispersal field and the seasonal high groundwater, even in the event of system failure. The County's analysis determined that two acres is the minimum size to ensure healthy and safety standards can be maintained.

• **Rent control:** LJCA requested that the County adopt provisions establishing rent control.

County response: At this time, the County is not seeking to establish rent control as the County's median rent is generally lower than California's median rent. County residents are also protected under the California Tenant Protection Act (AB 1482) which already establishes a limit on rent increases. The County continues to educate individuals on their rights as tenants and keep them informed regarding affordable housing programs available throughout the County to prevent families and individuals from overpaying for housing.

 Community Plan updates: LJCA requested that the County expedite its update of the identified Community Plan updates as part of Program 30 (Access to Education).

County response: The County has already initiated the updating of two of its community plans and will continue to do so based on funding availability.

• Solar panel program: LJCA requested that the County add a program to facilitate access to solar energy systems for lower income homeowners, particularly those in disadvantaged communities.

County response: The County augmented Program 28 stating that the County will identify and partner with agencies that have the mission and experience to expand solar to low-income and disadvantaged communities such as the Fresno Economic Opportunities Commission (EOC) or GRID Alternatives. The County will assist in two outreach efforts for the identified agencies to inform the rural residents of the solar programs.

• **Expand translation of implementation materials:** LJCA requested that the County mail out program information in primary languages including, but not limited to, Spanish, Hmong, and Punjabi.

County response: The County provides translation of materials on a case-by-case basis. In order to remain resourceful, the County determines if translation of mail is helpful for a specific community. Most of the unincorporated communities have large Spanish-speaking populations. The County does not believe that is resourceful or helpful for a community with only English or Spanish speakers to receive information in other languages. Communities change, but the County remains involved in these communities to get to know the residents and guarantee that they all have equal access to information. When conducting outreach to communities that have need for translation in Hmong or Punjabi, the County has provided such service and is ready to provide that service in the future.

CRLA, October 2, 2023

- Prior deliverables accomplished by the County: CRLA requested additional information on current
 or previous programmatic accomplishments in order to evaluate the proposed programs and associated
 objectives.
 - *County response:* Section 1A-5, Review of Past Accomplishments, along with the County's Annual Progress Reports (APRs) submitted to HCD (also published online at HCD's APR Data Dashboard webpage), provide a detailed breakdown of the County's annual and cumulative outcomes associated with the Fifth-Cycle Housing Element and its programs.
- Low-income sites in West and Northwest Fresno: CRLA expressed concern about the developability
 of the vacant sites and the suitability of their location, particularly related to the attributes of educational
 scores and environmental health burdens.

County response: After further coordination with the City of Fresno and other property owners, the County was able to revise its vacant sites inventory and replace sites identified in the Northwest Fresno area with sites in the Southeast Fresno and the Clovis areas. While CRLA compares selected AFFH factors of the West Fresno sites to those of the other parcels in the sites inventory, the County selected the parcels in the West Fresno area compared to AFFH factors for candidate sites that could be considered from across the entirety of the unincorporated county. The West Fresno sites were identified as among the best candidates based on the totality of factors (see a detailed description of development criteria), including AFFH factors. Some of the overall capacity identified on vacant sites to meet the lower-income RHNA (127 units, or 13%) was identified in a lower-resource area of the West Fresno SOI, which can help to encourage investment in affordable housing in an area with lower-income households that is close to economic opportunities in the City of Fresno, particularly one with good access to existing transit. The County's methodology adheres to the provisions of state law and reflects a countywide review of vacant and developed parcels. As much of the unincorporated county is developed as agricultural lands and on parcels larger than 10 acres (and per state law are considered developed and considered less likely to be developable within the planning period), many sites that might otherwise be more desirable from the perspective of certain AFFH factors (e.g., school performance) would not qualify as being suitable for inclusion in the County's sites inventory.

Additionally, the County has included programs in the Housing Element to identify and implement strategies to address fair housing issues in this area. The County refined Program 30 (Access to Education), to specify that it will coordinate with Central Unified School District (which serves the West Fresno SOI site that was retained from the previous draft sites inventory) to evaluate and address outside factors that impede student performance.

• Sites providing less than 50 units of capacity: CRLA expressed concern about the ability of sites with fewer than 50 units of capacity to compete for affordable housing funding.

County response: After further coordination with the City of Fresno and other property owners, the County was able to revise its vacant sites inventory and replace many of the smaller sites with larger sites. The County considers sites smaller than two acres as suitable based on: 1) state law, 2) past examples, and 3) additional programmatic emphasis on duplexes, triplexes, and fourplexes. First, state law (Government Code Section 65583.2(c)(2)) states that cites must be at least 0.5 acre to be deemed adequate (in terms of size) absent further analysis. Additionally, state law (Government Code Sections 65583.2(b)(i)-(iv) and 65583.2(d)-(f)) dictates that 20 units per acre is the default density for lower income housing for Fresno County. The County also excludes the application of state density bonus, which would entitle affordable housing projects to additional density equal to between 20% and 80%. Based on the County's current R3 zoning standards (29 units per acre maximum), a 50-unit affordable housing project (100% affordable) could be built on a site as small as 0.95 acre.

Second, the County considers sites with less than 50 units of zoned capacity as suitable based on past examples, including Marion Villas in Kingsburg, 34 affordable units built on 1.38 acres at 25 units per acre (see Table 1A-7). Another example was built in 2020 in Fresno by Self-Help Enterprises: Annadale Commons, 40 units of senior housing (39 lower income) that received 9% tax credits. These 40 units were built in 10 one-story fourplex apartment buildings.

Third, the sites with zoned capacity below 50 units are intended to align with Program 33, through which the County will facilitate the production of duplexes, triplexes, and fourplexes. This "missing middle" type of housing currently represents an incredibly small portion of the County's housing stock but can provide a more affordable housing option compared to single family detached without requiring the density of apartments. The County included Program 33 (Improving Housing Options) and a focus on duplex, triplex, and fourplex housing based on community input received during community workshops and stakeholder interviews. This type of housing can be built at the conservative density assumptions and project sizes cited in the County's sites inventory.

However, it is worth noting that all but two of the vacant sites identified to meet the lower-income RHNA are two acres or larger, with capacities that range from 64 to 213 (on any given individual site, based on maximum by-right density with identified new zoning, excluding density bonus).

• **Proximity to transit:** CRLA expressed the desire for sites that are close to transit services, both to better serve residents and to improve the ability of affordable housing projects to compete for funding.

County response: The County has updated the AFFH analysis to clarify that the phrase "limited transit access" was used in comparison to sites within the City of Fresno and other cities across the county. While the County agrees that closer proximity to transit is ideal, most parcels in the unincorporated county are far from transit services and are in areas of low population density that cannot justify the creation of new or extended transit service (even if new affordable housing is constructed). The County's revised vacant sites inventory includes parcels that are along or within one or two miles of existing transit service. Additionally, Program 32 (Improving Accessibility and

Safety on Roads and Streets) has been refined to reference the West and Southeast Fresno sites more explicitly as an area of priority for improving transit connectivity.

 Mobilehome park residents: CRLA expressed concern that additional programmatic and policy commitment was needed to protect mobilehome park residents from rent increases, evictions, and park closures.

County response: The County is committed to working on a case-by-case basis with mobile home park residents in identifying solutions to identified concerns. In the last two years the County has prioritized the use of its HOME Program funds to fund mobile home projects by providing mobile home projects exclusive access for the first two months of each funding cycle. The County augmented Program 18 to reference this prioritization. Additionally, County staff worked for many months to assist a local mobile home park (Shady Lakes) in identifying funding and creating a structure to assist the residents in purchasing the mobile home parks. The County commits to continue to assist any residents that request technical assistance in the future.

Protecting renter and farmworker households from predatory landlord behavior: CRLA expressed a desire for additional programmatic and policy commitment to protect rental and farmworker households from predatory landlord behavior, with a focus on facilitating the ability of tenants to report substandard conditions without fear of eviction or other intimidation tactics.

County response: To address violations of fair housing, the County's goal is to expand outreach and education for both landlords and renters to increase awareness of fair housing practices. The County has committed to multiple programs in the Sixth Cycle Housing Element to improve fair housing, with a focus on outreach and education to better educate residents on discrimination laws and how to report issues, increase and improve housing options, and improve neighborhoods and connectivity. The County has also committed to improving housing for farmworkers to increase availability of safe and affordable housing.

• **Expungement of criminal convictions:** CRLA expressed a desire for the County to facilitate the expungement of past criminal convictions (as passed through state law) so that formerly incarcerated individuals are not turned down on housing applications solely because of past legal violations.

County response: As referenced in CRLA's letter, Assembly Bill (AB) 1076 passed in 2019 and required the California Department of Justice (CA DOJ) to review and automatically clear certain non-serious offense records (arrests and convictions, including all misdemeanors) for people who already completed their sentence or diversion program, or if their arrest did not lead to a conviction. Another set of related bills passed in 2022: AB 1706 and Senate Bill 731. AB 1706 required counties and courts to seal eligible cannabis-related records if they had not been challenged by March 2023. SB 731 passed in 2022 and enabled a previously convicted person (for a much wider range of criminal convictions beyond cannabis, excluding sex offenses) to seal their records within four years of completing a sentence, as long as they don't have a new arrest.⁵ According to the CA

⁵ Johnson, Sydney. "Millions of Criminal Records Cleared after Landmark California Law Takes Effect." KQED, July 7, 2023. https://www.kqed.org/news/11955206/millions-of-criminal-records-erased-after-landmark-california-law-takes-effect.

DOJ, over 92% of past convictions were recalled, dismissed, resentenced, sealed, or redesignated by April 2023; the balance remain under evaluation and processing for eligibility.⁶

The Law Offices of the Public Defender provides free legal services through the Clean Slate Program for individuals that have paid all fines, are no longer on probation, and have no open cases. This program can assist individuals with expungement for increased opportunities to employment, housing, or financial aid. The application is available online (preferred) or in person at the Public Defender's office. The review process can take up to six weeks. If the individual qualifies for the Clean Slate Program, the Public Defender's office will assist them with the process. All information is available on the Public Defender's website. For questions, individuals can call (559)600-3546 or email cleanslate@fresnocountyca.gov.

Additional programs and actions to proactively enforce fair housing laws: CRLA expressed a
desire for stronger programmatic commitment on outreach related to fair housing issues.

County response: The County has augmented the cited page to include a previously omitted reference to Program 33 (Improving Housing Options) and how it directly addresses the strategy listed regarding expanding housing variety. On May 17, 2022 (Agenda Item No. 16), the BOS added five additional staff positions to the County's code enforcement unit. This action also included funding for necessary vehicles and equipment. This action resulted in an annual increase of \$1.3 million in funding to the Department.

Additionally, the County has budgeted Community Development Block Grant funds (CDBG) to hire an agency already receiving funding from HUD's Office of Fair Housing and Equal Opportunity (FHEO) to perform more education activities (for landlords, tenants, and advocates) and to conduct additional enforcement testing of fair housing laws in the rural areas and partner cities. The County will require future contractors and subrecipients providing housing services to submit records reflecting completion of training for civil rights and fair housing; and educate existing subrecipients and contractors on the existing laws for civil rights (nondiscrimination) and fair housing.

Self Help Enterprises (SHE), October 20, 2023

- High or highest resource sites availability: SHE indicated that the County should include as many high or highest resource sites as possible in their Housing Element site inventory, and cited an ideal ratio of high or highest-resource sites to other lower resource sites as 1:1. As of the 2023 TCAC assessment, all of the sites identified are within high or highest resource areas.
- Surplus sites. SHE encouraged the County to adopt a program to review all surplus property within one year of adoption of the Housing Element and make those sites available for the development of affordable housing.

County response: The County has included this action in Program 14.

⁶ State of California Department of Justice, AB 1706 Legislative Reports, June 2024.

• Entitlement processes. SHE discouraged the use of conditional use permits in otherwise compatible zoning in order to expedite the approval of housing projects.

County response: The County currently requires a conditional use permit for very few residential use types. Additionally, as part of Program 20, the County will meet with developers to identify whether any of the required findings or other aspects of the development review process have presented constraints to development and amend its project review process to address these constraints as is feasible.

Suitable sites. SHE pointed to the necessity of several factors in appropriate site selection, including sewer, water, and dry utilities, parcel sizes between 2.5 to 3 acres, "reasonable densities" (between 20-50 units per acre), and access to quality transit with 75 percent of sites within 0.5 miles of a transit stop.

County response: Sites were only included if they either had known groundwater resources, could support onsite septic systems, or could be served by piped water and wastewater systems either now or early in the planning period; additionally, only sites with existing paved roadways, electricity, and telecommunications systems. The County's inventory sites allow residential development at a density of 20 or 29 units per acre, with nearly all sites between 2 and 4 acres in size. The majority of sites identified are not within 0.5 miles of a transit stop. However, because of the limited transit access availability in the unincorporated county and the operational challenges of providing regular transit access in rural areas, the County does not consider sites without transit access to be unsuitable for housing development.

 Manufactured homes. SHE recommended that the County consider adding a program to update the Zoning Ordinance to add Manufactured Home on a Permanent Foundation to be allowed in all zones that allow single-family residences.

County response: Manufactured housing on a permanent foundation is currently permitted in all residential and non-residential zoning districts that permit single-family residences.

• Fee waivers or deferrals. SHE recommended that the County consider a fee waiver program for projects that include 100% affordable housing serving households below 80% of area median income.

County response: The County has some of the lowest development fees in the county, and so does not have an explicit fee waiver program. However, as part of Program 17 the County will continue to offer incentives to facilitate the development of affordable housing.

LCJA, June 6, 2024

 Community engagement in the housing element process: LCJA requested that the County provide additional opportunities to engage the community, including during subsequent drafts and revisions, as well as after adoption.

County response: The County will release any future draft edits to the public in order to solicit community feedback and, following the adoption of the Housing Element, will include the public in Housing Element implementation as outlined in multiple programs.

Including adequate programs and policies to improve housing options for all economic segments
of the community and affirmatively furthering fair housing: LCJA recommended the integration of
prior recommendations that the organization made to address HCD's feedback regarding adequately
analyzing housing needs for all income levels and obstacles to addressing those needs, including for
extremely low-income and farmworker households.

County response: The County has included actions in Program 35 to partner with HCD and the UC Davis Western Center for Agricultural Health and Safety on their upcoming California Farmworker Housing Study in order to have an expanded understanding of farmworker housing needs. As part of its recent Zoning Ordinance update, the County expanded the zones that allow for the development of single-room occupancy (SRO) housing, which can support the needs of extremely low-income households. Additionally, as part of Program 20, the County will further revise its Zoning Ordinance to facilitate the development of residential uses in commercial zones and to clarify the availability of a density bonus, both of which are expected to increase the availability of affordable housing for residents of all income levels. The County has included Program 27 to seek funding to provide rental assistance to families experiencing a housing crisis or to seasonal workers during the off-season.

 Including adequate programs and policies to address the infrastructure and service needs of lowincome communities of color and affirmatively furthering fair housing: LCJA requested greater emphasis on addressing long-term infrastructure and service needs related to water, wastewater, and streets for unincorporated communities.

County response: The County included Program 32 to address roadway and related infrastructure needs and feels this response is sufficient and prioritizes infrastructure needs in disadvantaged communities. The County also feels that Program 16 provides appropriate direction to seek out and support funding applications by unincorporated community service providers for infrastructure and service expansion. As part of Program 23, the County will continue to provide a loan program to low and moderate-income homeowners and housing owners with lower or moderate-income tenants to connect the home to an existing water or wastewater system, which can help to address barriers to water and wastewater infrastructure access.

Analyzing and creating adequate programs regarding environmental constraints: LCJA recommended that the County enhance its policies and implementation actions regarding pollution exposure, extreme heat, flood risk, and depleted groundwater sources as environmental constraints, and other policies that will complement a Climate Action Plan, especially as it relates to AFFH analyses.

County response: While not listed as a program in this Housing Element, the County recently released (April 2024) a request for proposals to prepare a Fresno County Comprehensive Climate Action Plan (CCAP). In addition to addressing projections and strategies to reduce greenhouse gas emissions, the CCAP will actively engage disadvantaged communities through public outreach as well as representation of such communities on a Working Group by community organizations. The Fresno Council of Governments has established a Stakeholder Steering Committee from the

previous plan and intends on growing membership during the CCAP for wider knowledge base. In addition to representative from all the 16 local governments in Fresno County, the Stakeholder Steering Committee also includes representatives from community-based organizations, transit agencies in the region, tribal representatives, industry experts, business representatives, agriculture representatives, and the general public.

Analyze and address the housing needs of seniors and people with disabilities: LCJA recommended that the County implement a yard maintenance program for residents who cannot perform this labor, including seniors and residents with disabilities. Additionally, LCJA recommended that the County go beyond identifying and removing barriers for these groups and find resources and strategies to encourage housing options and access to opportunities for community members who are seniors or who have disabilities.

County response: Through Program 13, the County will continue to provide in-home supportive services, provide Aged, Blind, Disabled (ABD) Medi-Cal, partner with local organizations to provide services to the disabled population experiencing homelessness, provide financial assistance for home repairs, and will partner with local agencies to identify resources the County can offer to seniors.

Lack of clear and strong commitments to achieving a beneficial impact: LCJA recommended that the Housing Element contain specific actions with timelines, discrete steps, and measurable outcomes resulting in beneficial impacts on housing needs within the eight-year period. Additionally, the LCJA highlighted the need for "meaningful actions" and that programs must go "well beyond combatting discrimination to overcome patterns of segregation and foster inclusive communities".

County response: The County has included a range of programs, specific actions, and quantified objectives with the intent of providing beneficial impacts on housing needs, with geotargeting applied where appropriate to help overcome patterns of disparate access to opportunities and resources.

LCJA, October 11, 2024

 Community engagement in the housing element process: LCJA requested that the County provide additional opportunities to engage the community after adoption, ongoing outreach such as advisory groups and tracking and feedback of public comments received during such outreach activities.

County response: The County will continue to solicit community feedback following the adoption through Housing Element implementation as outlined in multiple programs that are unique to the Housing Element and other County efforts. For example, there are a number of policies and implementation actions in the Count's recently adopted Environmental Justice related that overlap with housing and housing-related issues. In Program 5 (Access and Transforming Health), the County will also conduct outreach related to Environmental Justice Policy EJ-C.1 (Local Healthcare Access), such as meeting with medical service providers to identify obstacles to providing services in disadvantaged communities (Implementation Program EJ-C.B). Similarly,

the County's Housing Element Program 29 (Fair Housing Monitoring, Outreach, and Referral) involves substantial commitments to outreach unique to fair housing and other correlated issues, with parallel policies and implementation: EJ-A.8 (Community Input on Development Projects), EJ-E.1 (Engage Disadvantaged Communities), EJ-E.2 (Participation in Decision Making Process), EJ-E.3 (Meeting Accessibility), EJ-E.4 (Community Noticing and Outreach).

 Analysis of disproportionate housing needs and displacement risks impacting protected classes: LCJA requested additional analysis of trends and current/future housing needs for farmworkers and people with disabilities.

County response: The County's regional and local analysis of farmworkers and people with disabilities, as well as the County's programmatic language provides a substantial amount of information and commitment to facilitate housing for both of these special needs populations that is the same or similar to what is requested by LCJA. Additionally, as part of Program 35 (Housing for Farmworkers), the County has committed to actively partner with UC Davis on the upcoming California Farmworker Housing Study to generate additional understanding and solutions.

 Overall assessment of fair housing: LCJA requested more extensive analysis of segregation and integration patterns in various disadvantaged unincorporated communities (DUCs) and recommends that the County address the lack of infrastructure in DUCs through actions such as hiring dedicated grant writers to pursue relevant funding resources.

County response: As part of its Housing and Environmental Justice Elements, the County has already committed to various programs that will seek and prioritize funding for DUCs throughout Fresno County. For example:

- Housing Element Program 16 (Coordination of Infrastructure and Services) and Environmental Justice Element Policies EJ-A.10 (Safe Drinking Water), EJ-A.11 (Prioritization of Improvement and Programs), and Programs EJ-A.H.
- Housing Element Program 32 (Improving Accessibility and Safety on Roads and Streets) and Environmental Justice Element Policies EJ-A.6 (Caltrans Coordination), EJ-A.11 (Prioritization of Improvement and Programs), EJ-B.1 (Access to Services), EJ-B.2 (Encouraging Outdoor Activity), EJ-B.3 (Safe Routes to School), EJ-B.4 (Bicycle Facilities), EJ-B.5 (Bicycle Routes), EJ-B.6 (Parks and Trails Quality), EJ-B.8 (Rural Complete Streets); and Programs EJ-A.H, EJ-B.A, and EJ-B.C.

LCJA also expresses a desire for further analysis related to pollution exposure and historical land use decisions (of the County and the City of Fresno), particularly related to South Central Fresno, Calwa, and Malaga.

County response: Environmental conditions, including historical and current presence of industrial uses, are explicitly identified as a factor contributing to fair housing issues (Table 1A-22) and the County includes commitment through various programs in the Housing Element and Environmental Justice Element to address health concerns in these areas. Additional relevant

policies and narrative are provided in the County's response to LCJA's October 2023 letter—EJ-A.1 (Location of Sensitive Land Uses), EJ-A.2 (Mitigate for Sensitive Land Uses Near Environmental Concerns), EJ-A.3 (Use of Best Practice), EJ-A.5 (Diesel Particulate Matter), EJ-A.6 (Caltrans Coordination), EJ-A.7 (Air Pollution Control District), EJ-A.12 (Industrial Development), and EJ-A.15 (Sensitive Receptor Setbacks).

LCJA also expresses a concern that the County's sites inventory is deficient in furthering fair housing, particularly in relation to areas lacking infrastructure and the presence of market-rate housing in RCAA.

County response: The County explicitly acknowledges in the Housing Element the challenges of identifying areas suitable for new housing throughout the unincorporated county areas given the distance of many areas from urbanized communities that have the population and nonresidential growth needed to fund the construction and maintenance of infrastructure systems. Accordingly, the sites inventory pursues upzoning to expand housing opportunities close to infrastructure and economic opportunities in Fresno and Clovis, along with specific placed-based strategies to improve school performance (Program 30), employment opportunities (Program 31), and transportation infrastructure (Program 32), along with the broader infrastructure commitments in Program 16 (Coordination of Infrastructure and Services). As part of Program 34 (RCAA), the County is committing to coordinating with developers (which can include those in the Friant Ranch area) to obtain funding and entitlement for affordable housing development in an RCAA.

- Analysis of housing constraints: LCJA requested more extensive analysis of governmental and nongovernmental constraints, particularly adjacent land uses and NIMBY ism.
 - County response: Through Program 20 (Zoning Ordinance Amendments), the County is committing to changing permitting for a wide variety of housing types to be permitted by right, which will avoid any public hearings and the opportunity for NIMBYism to inhibit such future housing developments. Through Program 33 (Improving Housing Options), the County is committing to changing permitting requirements, changing development standards, and directly facilitating new housing options in a manner that combats NIMBYism and eliminates such opposition in the future. A response to LJCA's concern on land use and siting can be found in the previous County response related to LJCA's concern on pollution exposure and historical land use decisions.
- Housing programs and community needs: LCJA recommended additional direction for various programs, as listed below alongside the County's response.
 - County response:

<u>Program 1 (Regional Collaboration on Housing Opportunities</u>): LCJA recommends additional focus on securing employment (job creation and workforce development) to ensure residents can have the means to sustain financial; access to housing. The County's efforts to address job creation and workforce development (and its overlap with housing opportunities) can be found in Program 31 (Access to Employment). For example, the County is participating in a regional collaboration

to prepare a Comprehensive Economic Development Strategy (CEDS) for Fresno County and 14 incorporated cities to guide economic prosperity, resilience, and federal grant eligibility. A CEDS is also a prerequisite for designation as an Economic Development District (EDD) by the U.S. Economic Development Administration (EDA), with updates conducted every five years to qualify for EDA assistance. EDA Investment priorities that overlap with concerns expressed by LCJA and will be addressed by the CEDS include:

- <u>Equity</u>: Projects that advance equity across America including but not limited to women, Black, Latino, Indigenous and Native American persons, Asian Americans, Pacific Islanders, and underserved communities.
- <u>Workforce Development</u>: Projects that support workforce education and skills training activities directly connected to the hiring and skills needs of the business community.

<u>Program 13 (Seniors/Persons with Disabilities)</u>: LCJA requests additional information on partners and greater specificity in commitments to meetings and senior housing. Some of the information requested, as it relates to greater detail on the partners and timing of meetings, is already provided in Program 13, and additional information will vary based on which County department and activity is involved. Based on an evaluation of previous recipients, rehabilitation assistance as described in Program 23 (Housing Preservation and Rehabilitation) often assists senior households (large portion of recipients), providing quantified objectives that vary based on funding source. The County augmented Program 13 to encourage developers to build multigenerational housing that contains a broader mix of bedroom counts to ensure there are units suitable for seniors (studio and/or one-bedroom units).

<u>Program 16 (Coordination of Infrastructure and Services)</u>: LCJA recommends that the County work with communities and provide more information regarding community water and wastewater service. The County's program reflects a focus, given available and potential resources, to stabilize current community systems and coordinate with existing districts to expand service capacity. Once these efforts have taken place, the County will be positioned to allocate and pursue funding to expand water and wastewater service in other areas.

The County augmented Program 16 to communicate with all water and wastewater service providers about CDBG funding for infrastructure projects, specifically in disadvantaged unincorporated communities such as Cantua Creek, and to maintain a list of community services districts/areas water and wastewater infrastructure systems capacity and expansion needs, in the unincorporated communities with updates as appropriate (anticipated to be three times during the planning period).

<u>Program 17 (Affordable Housing Incentives)</u>: LCJA recommends additional incentives, an inclusionary housing ordinance, and partnerships to encourage affordable housing. The County is implementing upzoning and will continue to follow state law on density bonus and project streamlining. The County's per-unit development fees are lower than other jurisdictions in the

County (See Table 1A-32B) and multiple programs identify the County's commitment to partnering with developers and other entities to foster affordable housing.

<u>Program 23 (Housing Preservation and Rehabilitation)</u>: LCJA recommends a centralized application, application assistance, and a focus on funding for mobile homes. The County currently offers a single, centralized application (covers all funding sources) and County staff are available to provide bilingual assistance to helps applicants navigate the process, including hosting public workshops. The County has recently purchased and will be deploying new software (Neighborly) to further improve access, while continuing to allow hard copy applications. Finally, as identified in Program 18 (Extremely Low Income Households) the County provides exclusive access to HOME Program funds during the first two months of each funding cycle to mobile home projects.

<u>Program 25 (Homeownership Assistance)</u>: LCJA recommends a credit repair program and down payment assistance, including those that can be accessed by undocumented residents. The County currently refers residents to the Community Housing Council of Fresno to access a low- or no-cost credit repair program and County-approved first-time homebuyer education classes (financial management and homeownership), with assistance provide as bilingual, in-person, and online. See below for a response on funding sources for undocumented residents.

<u>Program 28 (Energy Conservation)</u>: LCJA recommends additional assistance and public awareness for cooling systems. As part of Program 28, the County has added a reference to the Low-Income Weatherization Program (LIWP) of the California Department of Community Services and Development, and specifically its Farmworker Housing Energy Efficiency & Solar PV program. This program provides eligible low-income farmworker households with solar photovoltaic (PV) systems and energy efficiency upgrades at no cost to residents. Additional reference was added to direct County policy in its Health and Safety Element, specifically those listed below. Relevant implementation programs are also listed below:

- Policy HS-G.4 Climate Pollution Reduction Practices for Income-Qualified Homes. The County shall support programs to provide financial assistance for the retrofitting of homes whose property owners are income qualified (such as water and energy efficiency upgrades, improved insulation, renewable energy upgrades, use of electric appliances, consideration of air quality, access to indoor cooling, structure hardening if the homes are in wildfire zones and elevating if homes are in flood zones).
- Policy HS-G.5 Cooling Centers. The County shall continue to work with cities and unincorporated community service districts to open cooling centers during extreme heat events, advertise the availability of these centers to unincorporated communities, and confirm that there is convenient access to these centers for unincorporated communities.
- Implementation Program HS-G.A. The County shall support property owners in applying for and accessing financial assistance for eligible low-income individuals for constructing and retrofitting buildings to be more energy efficient and for the purchasing of low-carbon-emitting appliances

- Implementation Program HS-G.B. The County shall coordinate with Cities to identify and map cooling centers in locations accessible to vulnerable populations and establish standardized temperature triggers for when they will be opened.
- Funding sources and potential exclusions for certain groups: LCJA recommended that the County seek or allocate additional funding, particularly in cases where typical federal funding might otherwise exclude certain groups such as undocumented residents.

County response: The County is exploring how to leverage non-federal funding sources (state or philanthropic) to assist people regardless of documentation status. As clarity on access to and use of such funds is available, the County will supplement funding for its housing programs.

LCJA, *December 19*, 2024

• **Multiple topics:** LCJA resubmitted a copy of their October 11, 2024 letter and reiterated comments from their October 2023, June 2024, and October 2024 letters, with suggestions on phasing and potential fundings sources for implementation.

County response: Responses and revisions regarding comments in this letter are addressed in previous responses to past letters and no new information or requests were included that necessitated changes to the Housing Element.





A Regional Plan for Addressing Housing Needs

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