

<p><b>The City of Fresno has made a diligent effort to engage the public and has carefully considered each comment. The comments are not verbatim but are summarized from letters received by the commentors. The Response column directs the reader to the appropriate section in the Revised Public Draft of the Housing Element. The redline version has been referenced for ease of use in discerning the changes.</b></p>						
#	Ch.	Comment	Name	Date	Response	HE Change (Y/N)
1	2	Add a bicycle parking element to your multi-family discussion so that folks have a place to park their bicycles if they live in the units or visit someone living in apartment units. Bike storage would also be appropriate. See <a href="http://www.apbp.org">www.apbp.org</a> for bike rack types and placement.	J. Cinatl	1.13.16	The Housing Element does not cover site specific design standards such as bicycle parking, however the City's newly adopted Development Code requires 1 space per 15 multifamily units. The city is currently updating its Active Transportation Plan and additional bicycle parking and storage requirements may be a recommendation of that plan.	N
2	4	The text states, "There is sufficient annexed and zoned land within the City to accommodate immediate housing needs and the housing needs for this Housing Element planning period." Question: Does the City state anywhere in the document that there is no need to rezone or annex additional land or is the City proposing to restrict annexations?	J. Roberts	1.19.16	The Housing Element is required to show that the city has enough zoned land within city limits to accommodate it's Regional Housing Needs Allocation for the current Housing Element cycle, which is eight years (2015 - 2023). This Housing Element accomplishes that goal, as described in Chapter 3, Land for Housing. The Housing Element is not proposing to restrict annexation.	N
3	4	There is a heading called "Excessive Land Value in Select Areas". The text states that this is an "unmanageable constraint" yet says that "The City is addressing excessive land value and its implications on affordability through the recent General Plan and development Code updates". From reading this text, it sounds as though the City IS trying to manage the value of land. Question: Please tell me how and where ( in the text of the General Plan and Development Code ) the words exist that address excessive land value?	J. Roberts	1.19.16	This section was deleted from Chapter 4 - Constraints to Housing Production, as it was no longer relevant.	Y

#	Ch.	Comment	Name	Date	Response	HE Change (Y/N)
4	4	<p>There is a reference to the 2008 Housing Element entitled "Program 2.1.18 – Inclusionary and Alternative Housing Policy Programs". It states, "Also, the RDA, as required by California Redevelopment Law, shall utilize mandated inclusionary housing policies to assist in the production of low to moderate income housing units". The column next to this one explains what has happened since 2008 and what will occur during the life of the 2015 Housing Element. The text in this column states, "the RDA source is removed from the 2015 Housing Element. The intent of the program will be folded into a general affordable housing program". Question: Does the Housing Element contain a program, policy, or requirement for either "Inclusionary" housing or an affordable housing program that does the same thing as an Inclusionary housing policy?</p>	J. Roberts	1.19.16	<p>The Housing Element does not contain a program, policy or requirement for either "inclusionary" housing or inclusionary zoning. However, the city is facilitating mixed-income housing through several programs in the Housing Element. For example, to facilitate production of housing for lower income households, 3,516 additional units of capacity affordable to lower income households were added to the sites inventory in the revised public draft. In addition, Program 4 provides TOD Height and Density bonuses to developments proposed near public transit services. Programs 5, 6, and 7 will assist in identifying funding assistance for development of mixed-income neighborhoods and developments accommodating persons with special housing needs, and partnering with affordable housing developers to attract affordable housing developments. These are some, but not all of the ways the City seeks to encourage mixed-income housing.</p>	N

#	Ch.	Comment	Name	Date	Response	HE Change (Y/N)
5	2, 4, 6	<p>Not any thing in Housing Element that speaks to Housing Discrimination as a barrier to housing choice of Fresno residents. There is mention of our organization--but the City is not using the data in terms of equitable neighborhood/housing planning. Please note that pretty much all low income/subsidized housing is developed in low-income, minority neighborhoods. Fresno needs to examine how such planning coincides with HUD's new AFFH rule. The Housing Element should not be about how hard it is for these developer's to develop with all these zoning and land-use rules! It should be about the ability of all Fresno residents--regardless of race, color, national origin, religion, gender, disability, family status, source-of-income et al--to live in decent housing in the neighborhood of their choice. Deep in the heart of northeast Fresno neighborhoods, you would be hard-pressed to find a Seven-11, but in 93705, 93701-02-03-25-27-22, not only can you find mini-marts and gas stations, but Payday lenders by the gross. What rarefied atmospheres must exist in these predominately white neighborhoods...</p>	M. Borelli	1.13.16	<p>Government Code Section 65583(a)(5) requires an analysis of government constraints to housing production, so the discussion about development rules and processing in Chapter 4 - Constraints to Housing Production, is required.</p> <p>See Figure 3-1 on page 3-18 and maps on pages 3-23 and 3-25 for a bar chart of housing densities by development areas and mapping of the sites inventory by zoning/density and racially/ethnically concentrated areas of poverty. The figure and maps show housing affordable to lower income households is distributed across most areas of the city.</p> <p>In addition, even though the housing element is a planning document and not a housing production document per Government Code Sections 65580-65581, the Housing Element includes several programs to ensure that the city is facilitating the production of housing for lower income households throughout the city. For instance, Program 4 provides TOD Height and Density bonuses to developments proposed near public transit services. In addition, Programs 5, 6, and 7 will assist in identifying funding assistance for development of mixed-income neighborhoods and developments accommodating persons with special housing needs, and partnering with affordable housing developers to attract affordable housing developments. These are some, but not all of the ways the City seeks to encourage production of affordable housing.</p>	Y

#	Ch.	Comment	Name	Date	Response	HE Change (Y/N)
6	2, 6	<p>Also, the Housing Element absolutely excludes design and construction provisions mandated under the Fair Housing Act for any multi-unit complexes with first occupancy after March 21 of 1991. These design accessibility requirements apply to such housing units (unless otherwise exempted--such as pretty much all "loft" townhouse multi-unit developments by Granville/Assemi downtown; Mr. Assemi should be obliged to develop ACCESSIBLE housing, for a change). ADA is about public access (outside the front door and off property), whereas FHA design and construction is applicable (and the law) to all multi-unit housing from 1991 on forward. One of the City's HOME fund recipients, Arbor Court Apartments--a HUD 811, no less, was sued by us on behalf of their disabled residents for violations of FHA ( their first occupancy was in January of 2010!) and had to retrofit certain common areas on the property--just one of many examples that our office seeks to remedy. Once gain--review the new AFFH rule.</p>	M. Borelli	1.13.16	<p>The City's Certified Access Specialist has clarified that the city does not review plans for compliance with, nor does it have the authority to enforce, Federal accessibility legislation (ADA, FHA). This is the responsibility of the designer to ensure compliance. The City does review plans for and enforce the California Building Code Chapter 11A as it addresses privately funded multi-family projects and 11B for publicly funded multi-family projects. Regarding the Assemi projects, several of them were designed as triplex condominium developments and as such are not considered "covered multi-family dwelling units" for the purpose of applying adaptability requirements per 1102A.1. See Chapter 6 - Housing Plan, Program 7 - Special Needs Housing, and Program 20 - Neighborhood Infrastructure Program for accessibility-related programs.</p>	Y

#	Ch.	Comment	Name	Date	Response	HE Change (Y/N)
7	1,6	The city should enhance it's outreach efforts to inform community about affordable housing planning processes and resources available by 1) passing out flyers at residences; 2)attending school parent coffee hours and other community events; 3) post information about all available resources and requirements with respect to affordable housing on a city web page in English, Spanish and other languages spoken by residents.	A. Bravo, et al, residents of Jane Addams neighborhood	1.29.16	Government Code Section 65583(c)(8) requires that the city make a diligent effort to encourage public participation. See Chapter 1, pages 1-5 - 1-9 for a complete description of the outreach process and methods employed, which included trilingual (Spanish, Hmong and English) flyers distributed to the 8 schools where workshops were held, to the Fresno Bee, and to a list of approximately 500 advocates, stakeholders and interested persons. Spanish and Hmong interpreters were also provided at all community workshops held. In addition, through January and February of 2016, the city also provided for public comment on the draft Element at 19 meetings of various city commissions, such as the city council and planning commission. Future public comment opportunities will be available in March and April at commission meetings, such as the planning commission's March 30, 2016 meeting.	N
8	6	Expand financing available to help first-time home buyers.	A. Bravo, et al, residents of Jane Addams neighborhood	1.29.16	See Chapter 6 - Housing Plan, Program 8: Home Buyer Assistance	N
9	6	Expand financing available to support remodeling for old delapidated homes	A. Bravo, et al, residents of Jane Addams neighborhood	1.29.16	See Chapter 6 - Housing Plan, Program 21: Housing Rehabilitation, and Program 12: Home Energy Tune-Up Program. This program was added to the Revised Draft and provides free energy inspections to residents and possible financing programs to help pay for energy upgrades.	Y
10	6	Create an inspection & [sic] code enforcement programs for second units. The units are often unpermitted and in dangerous condition.	A. Bravo, et al, residents of Jane Addams neighborhood	1.29.16	See Chapter 6 - Housing Plan, Program 19: Comprehensive Code Enforcement. This program was updated to include the city's most recent efforts in this area.	Y
11	6	Create an expanded rental assistance program for low income residents, especially to support seasonal workers.	A. Bravo, et al, residents of Jane Addams neighborhood	1.29.16	See Chapter 6, Housing Plan, Program 16, related to Farmworker Housing.	N

#	Ch.	Comment	Name	Date	Response	HE Change (Y/N)
12	6	Need protection for undocumented residents: landlords often overcharge undocumented residents. Proof of legal status should not be a requirement to receive housing assistance.	A. Bravo, et al, residents of Jane Addams neighborhood	1.29.16	Pending further state or federal legislation, the Housing Element is not required to contain programs addressing this issue.	N
13	6	All housing programs should be available to undocumented residents	A. Bravo, et al, residents of Jane Addams neighborhood	1.29.16	Pending further state or federal legislation, the Housing Element is not required to contain programs addressing this issue.	N
14	6	Create a program to assist residents with payment for houses that have decreased in value due to the housing market crash to prevent foreclosure and to assist in paying all past-due housing debt for low income residents.	A. Bravo, et al, residents of Jane Addams neighborhood	1.29.16	The city does not currently have such a program, however the Community Housing Council of Fresno at (559) 221-6919 may be able to help, as they assist families with foreclosure and default counseling and may be able to refer to other agencies that would provide financial assistance.	N
15	6	Enforce habitability laws against landlords to address unsafe living conditions.	A. Bravo, et al, residents of Jane Addams neighborhood	1.29.16	See Chapter 6 - Housing Plan, Program 19: Comprehensive Code Enforcement. This program was updated to include the city's most recent efforts in this area.	Y
16	6	Enact a law to prohibit smoking in rental apartments and other areas where children live and play (including parks).	A. Bravo, et al, residents of Jane Addams neighborhood	1.29.16	Per Government Code § 65580, the Housing Element is intended to ensure the availability of affordable housing. While exposure to secondhand smoke is an important health consideration, a program to prohibit smoking in rental apartments is not targeted to further the goal and objective of the Housing Element to facilitate the availability of housing.	N
17	6	Invest in our neighborhood (Jane Addams) and other low income neighborhoods to ensure access to basic infrastructure like sidewalks, street lights, and stormwater drainage.	A. Bravo, et al, residents of Jane Addams neighborhood	1.29.16	See Chapter 6 - Housing Plan, Program 20: Neighborhood Infrastructure Program, which funds approximately 5 infrastructure projects annually.	N

#	Ch.	Comment	Name	Date	Response	HE Change (Y/N)
18	3	Required Carry Over Analysis: The Draft HE does not include the required carry-over analysis required under Government Code Section 65584.09.	A. Werner on behalf of Familias Addams	2.5.16	The revised draft includes the carry-over analysis. See Chapter 3 - Land for Housing.	Y
19	3	Applicable Zoning: The Draft includes an inventory of sites that have not yet been zoned to permit the residential densities identified in the draft.	A. Werner on behalf of Familias Addams	2.5.16	The zoning on all sites identified in the housing element sites inventory was approved by the City Council as part of the citywide rezone on February 4, 2016.	Y
20	3	Realistic Development Potential of Non-Vacant Sites: The city must analyze whether the non-vacant parcels included in its site inventory have a realistic development potential during this planning period.	A. Werner on behalf of Familias Addams	2.5.16	Analysis is included in Chapter 3 - Land for Housing.	Y
21	3	Development Capacity: inventory includes commercial sites with no minimum density for residential development; the inventory assumed 75% of the allowable density for these sites - need to show recent development trends to support this.	A. Werner on behalf of Familias Addams	2.5.16	The various types of sites included in the inventory and the justification for including them in is Chapter 3 - Land for Housing. See discussion under subheading "Realistic Capacity" on pages 3-7 though 3-9.	Y
22	3,6	Compliance with Fair Housing and Civil Rights Statutes: the HE must include analysis, policies and program actions demonstrating that the HE, including its sites inventory, will reduce--and not fortify--barriers to fair housing for protected classes in Fresno.	A. Werner on behalf of Familias Addams	2.5.16	See Figure 3-1 on page 3-18 and maps on pages 3-23 and 3-25 for a bar chart of housing densities by development areas and mapping of the sites inventory by zoning/density and racially/ethnically concentrated areas of poverty. The figure and maps show housing affordable to lower income households is distributed across most areas of the city.	Y

#	Ch.	Comment	Name	Date	Response	HE Change (Y/N)
23	1	Compliance with Public Participation Requirements: the City has submitted the Draft to HCD for review during the same time period the City is receiving public comment on the Draft, thereby rendering the public's comment without any impact on the development of the element in direct violation of what the law requires.	A. Werner on behalf of Familias Addams	2.5.16	Government Code Section 65583(c)(8) requires that the city make a diligent effort to encourage public participation. See Chapter 1, pages 1-5 - 1-9 for a complete description of the outreach process and methods employed. Comments from all of the community workshops and written comments received during the public comment period (January 7 - February 29, 2016) have been carefully considered and where appropriate, changes have been made. This Revised Draft incorporates the input received during the public comment period and this Revised Draft is now being considered by the State Department of Housing and Community Development.	N
24	2	Correct language related to individuals with disabilities, ie disabled people = individuals with disabilities; households supporting disabled persons = households that included individuals with disabilities; elderly = seniors or older adults; mental retardation or developmentally disabled persons = intellectual or developmental disability	Shannon Mullhall, on behalf of DAC & self	2.16.16	Changes were made to reflect the correct terms throughout the document. See Chapter 2, pages 2-10 through 2-24.	Y
25	2, 6	Developmental Centers: there are only 3 and they are in the process of closing. More people will be housed in the community	Shannon Mullhall, on behalf of DAC & self	2.16.16	Changes were made on page 2-14 to correct this information.	Y
26	2	Update statistics for local and statewide number of individuals with disabilities. CVRC can assist.	Shannon Mullhall, on behalf of DAC & self	2.16.16	Changes were made on pages 2-14 and 2-15 to correct this information.	Y
27	2,4, 6	CVRC is the the process of approving several new kinds of housing and supportive living licensing options for their vendors and clients, which may impact the Housing Element and/or have zoning implications.	Shannon Mullhall, on behalf of DAC & self	2.16.16	Comment noted.	N



#	Ch.	Comment	Name	Date	Response	HE Change (Y/N)
28	4	Residential care facilities - number of allowable beds/individuals serviced has reduced from 6 to 4. Check with CVRC on the specifics for limited versus general care facilities.	Shannon Mullhall, on behalf of DAC & self	2.16.16	Comment noted. The change from 6 to 4 beds/individuals services would still be accommodated as group housing and allowed by right in several residential zone districts.	N
29	2	CIL changed its name to Resources for Independence, Central Valley (RICV)	Shannon Mullhall, on behalf of DAC & self	2.16.16	Revision made on page 2-16.	Y
30	2	Add Deaf and Hard of Hearing Service Center, Inc (DHHSC) and Exceptional Parents Unlimited (EPU)	Shannon Mullhall, on behalf of DAC & self	2.16.16	Revision made on page 2-16.	Y
31	4, 6	How is inclusionary housing built and what are the annual reporting requirements?	Shannon Mullhall, on behalf of DAC & self	2.16.16	<p>Pursuant to Government Code Sections 65580-65581, the housing element is a planning document, not a housing production document. However, the city is facilitating mixed-income housing through several programs in the Housing Element. For example, to facilitate production of housing for lower income households, 3,516 additional units of capacity affordable to lower income households were added to the sites inventory in the revised public draft. In addition, Program 4 provides TOD Height and Density bonuses to developments proposed near public transit services. Programs 5, 6, and 7 will assist in identifying funding assistance for development of mixed-income neighborhoods and developments accommodating persons with special housing needs, and partnering with affordable housing developers to attract affordable housing developments. These are some, but not all of the ways the City seeks to encourage mixed-income housing.</p> <p>The annual reporting requirement is an HCD requirement. Each jurisdiction with a housing element must submit an annual progress report updating HCD on the jurisdiction's progress in implementing the housing element. These annual progress reports are available on the City of Fresno's website.</p>	N

#	Ch.	Comment	Name	Date	Response	HE Change (Y/N)
32	6	How exactly does this program (Adequate Sites) encourage development of housing for persons with disabilities? Suggest that local disability consultants be utilized more frequently on the developer teams to advise on needs for people with disabilities and older adults.	Shannon Mullhall, on behalf of DAC & self	2.16.16	3,516 dwelling units of additional capacity affordable to lower income households were added to the sites inventory (Chapter 3 - Land for Housing, pg 3-6). Chapter 6 - Housing Plan, Program 7 - Special Needs Housing was modified to include the requirements of the city's Universal Design Ordinance (see page 6-7).	Y
33	6	This program covers special needs housing and calls out that it includes people with disabilities in its intro, but there are no bullet points addressing how people with disabilities or universal design will be addressed or implemented.	Shannon Mullhall, on behalf of DAC & self	2.16.16	Chapter 6 - Housing Plan, Program 7 - Special Needs Housing was modified to include the requirements of the city's Universal Design Ordinance (see page 6-7).	Y
34	6	Suggest development incentives for universal design and accessible housing	Shannon Mullhall, on behalf of DAC & self	2.16.16	Chapter 6 - Housing Plan, Program 7 - Special Needs Housing was modified to include the requirements of the city's Universal Design Ordinance (see page 6-7), however no specific incentives have been added for universal design.	N
35	6	On 2/25 our updated ADA Plan for the Right of Way will be going before council, which could be integrated in this section. The term "wheelchair ramp" should be replaced with "curb ramp." The ADA Advisory Council should be replaced with the Disability Advisory Commission (have the consultant double-check the whole doc for this – the ADAAC was dissolved in 2008 and replaced with DAC).	Shannon Mullhall, on behalf of DAC & self	2.16.16	Chapter 6 - Land for Housing, Program 20: Neighborhood Infrastructure, was modified to include the proper terminology and reference the ADA Transition Plan for the Public Right of Way, page 6-15.	Y
36	6	Should Objective H-5 include "disability" in the heading?	Shannon Mullhall, on behalf of DAC & self	2.16.16	Revision made. See Chapter 6 - Housing Plan, page 6-18.	Y

#	Ch.	Comment	Name	Date	Response	HE Change (Y/N)
37	4	I applaud the inclusion of the section on "Access to Mobility Options." This is a frequent complaint I and FAX both receive in regards to the areas that have developed on the fringe of the city. I notice the use of "should" in this section... are the specific regulations or policies, or is this only a best practice suggestion?	Shannon Mullhall, on behalf of DAC & self	2.16.16	It is a best practice that has been incorporated into Chapter 4 of the city's General Plan, Mobility and Transportation. Several Goals, Objectives and Policies address mobility options. See the policies that support Objective MT-9: Provide public transit opportunities to the maximum number and diversity of people practicable in balance with providing service that is high in quality convenient, frequent , reliable, cost-effective and financially feasible.	N
38	6	Encourage more universal design in development so that people can age in place. This could, over the long term, reduce some of the need for specialized homes for when older adults can no longer use their home for accessibility reasons. I see a benefit to building low-income senior communities, yet at the same time I also frequently hear of seniors who have to leave their home because it is no longer accessible (whether this occurs gradually from a reduction in mobility or due to a sudden illness/injury).	Shannon Mullhall, on behalf of DAC & self	2.16.16	Chapter 6 - Housing Plan, Program 7 - Special Needs Housing was modified to include the requirements of the city's Universal Design Ordinance (see page 6-7).	Y

#	Ch.	Comment	Name	Date	Response	HE Change (Y/N)
39	6	I regularly get calls from individuals who experience a sudden disability and find that they need to make costly adaptations to their home or try to move (also a challenge on a fixed income). They frequently ask if the city has a program that provides individual grants that would support the adaptation of an existing home. Something like this might be a program worth exploring. (I know of one non-profit that does renovations for low-income individuals who are suddenly disabled, but it greatly depends on donations)	Shannon Mullhall, on behalf of DAC & self	2.16.16	The city does not currently have a program specifically for adaptation retrofits, but it is committed to exploring more ways to provide special needs housing for seniors. See Chapter 6 - Housing Plan, Program 7: Special Needs Housing (page 6-7). Also see Program 20: Housing Rehabilitation (page 6-15).	N
40	3	The Housing Element failed to demonstrate the feasibility of development sites because it lacks analysis demonstrating the feasibility of developing lower-income housing on small sites.	Leadership Counsel for Justice and Accountability	2.26.16	Chapter 3 - Land for Housing, pages 3-11 and 3-12 includes new sections that demonstrate the feasibility of developing lower-income housing on small sites. In summary, the city has several recent low income developments that have occurred on small sites, and additionally, the city is facilitating lot consolidation by significantly lowering the fees for Voluntary Parcel Mergers. See Chapter 6 - Housing Plan, Program 15: Large and Small Lot Development.	Y
41	3	The Housing Element failed to demonstrate the feasibility of development sites because it lacks analysis demonstrating the feasibility of developing lower-income housing on large sites of 20 acres or more.	Leadership Counsel for Justice and Accountability	2.26.16	Chapter 3 - Land for Housing, pages 3-11 and 3-12 includes new sections that demonstrate the feasibility of developing lower-income housing on large sites. In summary, the city allows phasing on larger sites and also can address planning on those sites through the specific plan process, where applicable. See Chapter 6 - Housing Plan, Program 15: Large and Small Lot Development.	Y
42	3	The Housing Element failed to account for substantial residential downzoning in the 2008 Housing Element Planning Period	Leadership Counsel for Justice and Accountability	2.26.16	Downzoning of 2008 Housing Element sites did not occur. Rezones occurred on only 25 sites in the previous inventory out of a total 888 sites and resulted in a residential unit capacity gain of approximately 249 dwelling units.	N

#	Ch.	Comment	Name	Date	Response	HE Change (Y/N)
43	3	The Housing Element fails to demonstrate compliance with fair housing law with respect to site location - the draft provides no analysis demonstrating distribution of sites by income category.	Leadership Counsel for Justice and Accountability	2.26.16	See Figure 3-1 on page 3-18 and maps on pages 3-23 and 3-25 for a bar chart of housing densities by development areas and mapping of the sites inventory by zoning/density and racially/ethnically concentrated areas of poverty. The figure and maps show housing affordable to lower income households is distributed across most areas of the city.	Y
44		The City should include a program in the HE to rezone industrial land located in proximity to and in conflict with residential neighborhoods to residential and mixed use zone districts at appropriate densities to meet the city's need for affordable housing as well as other zone districts that create opportunity to allow development of needed services and amenities.	Leadership Counsel for Justice and Accountability	2.26.16	The city already approved such land use and zone changes with its recent general plan and zoning map updates. The city has also authorized the Southwest Specific Plan process, currently underway. Any additional land use changes desired by the community will be proposed as part of that process.	N
45	1	The City failed to make a diligent effort to achieve participation of low-income residents and other stakeholders. The City should use culturally sensitive and language-appropriate communication tools to reach its target audience. City staff and elected officials should develop and sustain long-term relationships with community leaders throughout Fresno and from Fresno's low-income neighborhoods of color and immigrant population who can convey pertinent information to their networks.	Leadership Counsel for Justice and Accountability	2.26.16	Government Code Section 65583(c)(8) requires that the city make a diligent effort to encourage public participation. See Chapter 1, Introduction pages 1-5 - 1-9 for a complete description of the outreach process and methods employed, which included trilingual (Spanish, Hmong and English) flyers distributed to the 8 schools where workshops were held, to the Fresno Bee, and to a list of approximately 500 advocates, stakeholders and interested persons. Spanish and Hmong interpreters were also provided at all community workshops held. In addition, through January and February of 2016, the city also provided for public comment on the draft Element at 19 meetings of various city commissions, such as the city council and planning commission. Future public comment opportunities will be available in March and April at commission meetings, such as the Housing and Community Development Commission's March 23 meeting and the Planning Commission's March 30, 2016 meeting.	N
46	1,6	The HE Draft fails to incorporate public comments, The Draft HE does not indicate whether or how any of the comments, concerns or solutions raised by participants were incorporated into the Draft HE.	Leadership Counsel for Justice and Accountability	2.26.16	The Revised Public Draft has made significant changes in response to public comment. See this matrix and redline version of the draft for responses. A summary response to the public comments received at the community workshops held in October and November of 2015 is on page 1-8 of the revised draft.	Y

#	Ch.	Comment	Name	Date	Response	HE Change (Y/N)
47	6	The Final HE must commit to actions that the city will take to expand stakeholder participation in implementation	Leadership Counsel for Justice and Accountability	2.26.16	Program 3: Annual Reporting Program, has been added in Chapter 6 - Housing Plan, to encourage an annual report to the Housing and Community Development Commission and input from stakeholders and residents on the progress of Housing Element implementation.	Y
48	5	The Draft HE fails to adequately analyze and respond to effectiveness of past performance, specifically in reference to the following programs:	Leadership Counsel for Justice and Accountability			
49	5	Program 1.1.2 - One Stop Processing (see letter for details)	Leadership Counsel for Justice and Accountability	2.26.16	In general, the Business Friendly Fresno development processing program has reduced processing times for all applications, including affordable housing projects. Program 13 on pages 6-11 and 6-12 includes an Expedited Processing/BFF program that will continue to prioritize housing affordable to low income households, and requires a review every two years.	Y
50	5	Program 1.1.4 - Institutional Barriers (see letter for details)	Leadership Counsel for Justice and Accountability	2.26.16	See Chapter 5 - 2008-2013 Program Accomplishments, page 5-3. In addition, the city adopted mixed use provisions into the zoning code in 2008 which allowed flexible development standards and density, thus removing many zoning related barriers to the development of affordable and market rate housing.	Y
51	5	Program 1.1.7 - Fresno Green (see letter for details)	Leadership Counsel for Justice and Accountability	2.26.16	Parc Grove Commons, a City and Housing Authority partnership project that included 363 apartment units, met green building standards. Bridges at Florence, Cityview Apartments, and Renaissance at Santa Clara were certified Build It Green, a Fresno Green equivalent. All of these projects included affordable housing. See Chapter 5 - 2008-2013 Program Accomplishments, page 5-4.	Y
52	5	Program 2.1.1 - Land Demand (see letter for details)	Leadership Counsel for Justice and Accountability	2.26.16	See Chapter 5 - 2008-2013 Program Accomplishments, page 5-5. During the 2008 Housing Element period, rezones occurred on only 25 sites in the previous inventory out of a total 888 sites and resulted in a residential unit capacity gain of approximately 249 dwelling units. A carry-over of 3,516 units of capacity affordable to low income households from the 2008 Housing Element period was carried over to the current period to ensure adequate capacity.	Y

#	Ch.	Comment	Name	Date	Response	HE Change (Y/N)
53	5	Program 2.1.4 - Inner City Residential Development (see letter for details)	Leadership Counsel for Justice and Accountability	2.26.16	See Chapter 5 - 2008-2013 Program Accomplishments, page 5-6. 240 inner city units were approved. The goal was not achieved, possibly due to economic factors beyond the city's control, however new development incentives and planning initiatives should stimulate further inner city residential development during the current cycle. See Chapter 6 - Housing Plan, Programs 11: Downtown Development Standards, and Program 14: Development Incentives.	Y
54	5	Program 2.1.5 - Other Infill Housing (see letter for details)	Leadership Counsel for Justice and Accountability	2.26.16	See Chapter 5 - 2008-2013 Program Accomplishments, page 5-6.	Y
55	5	Program 2.1.7 - Multi-family land supply (see letter for details)	Leadership Counsel for Justice and Accountability	2.26.16	See Chapter 5 - 2008-2013 Program Accomplishments, page 5-7, 5-8.	Y
56	5	Programs 2.1.13 through 16 - Production of transitional, large family and low-income senior housing units (see letter for details)	Leadership Counsel for Justice and Accountability	2.26.16	See Chapter 5 - 2008-2013 Program Accomplishments, page 5-11, 5-12.	Y
57	5	Program 4.1.2 - Preventing and Alleviating Foreclosure (see letter for details)	Leadership Counsel for Justice and Accountability	2.26.16	See Chapter 5 - 2008-2013 Program Accomplishments, page 5-16, 5-17. The City adopted the Vacant Blighted Building Ordinance in 2015 which includes property owner reporting responsibilities and increased fines for non-compliance.	Y
58		The Draft HE fails to adopt satisfactory program actions, specifically:				
59	6	Program 5 - Special Needs Housing - clearer goal	Leadership Counsel for Justice and Accountability	2.26.16	See Chapter 6 - Housing Plan, pages 6-7, 6-8. The goal was clarified to include serving 500 households over the planning period, equivalent to 62.5 households per year.	Y

#	Ch.	Comment	Name	Date	Response	HE Change (Y/N)
60	6	Program 8 - Fresno Green -must not only monitor but pursue grant funding; and clarify which parts of the Fresno Green Strategy are applicable	Leadership Counsel for Justice and Accountability	2.26.16	See Chapter 6 - Housing Plan, pages 6-9, 6-10. Several aspects of the Fresno Green strategy have been incorporated into the new General Plan, Development Code and Rezone. The focus for the housing element are fee reductions and zoning standard flexibility for Fresno Green certified projects. Reporting on progress of Fresno Green strategy implementation will occur as part of the Annual Reporting Program established in new Program 2.	Y
61	6	Program 9 - Expedited Processing - need clear timeline and trigger	Leadership Counsel for Justice and Accountability	2.26.16	See Chapter 6 - Housing Plan, pages 6-11, 6-12. Annual reporting on implementation of this program will occur as part of the Annual Reporting Program 2; additional timeframe parameters were added.	Y
62	6	Program 10 - Development Incentives - Need timeline with specific actions and how the city will assess funding availability	Leadership Counsel for Justice and Accountability	2.26.16	See Chapter 6 - Housing Plan, Program 10: Development Incentives, pages 6-7, 6-8. Specifics were added about the city's new impact fee waiver programs. In addition, Program 5, Housing Funding Sources on page 6-5, has been expanded to include additional innovative funding mechanisms to support affordable housing. Timing provisions have been added.	Y
63	6	Program 11 - Agricultural Employees - the city should commit to revising the Development Code if necessary	Leadership Counsel for Justice and Accountability	2.26.16	See Chapter 6 - Housing Plan, Program 16, 6-13. The commitment was added.	Y
64	6	Program 14 - Comprehensive Code Enforcement - City must commit not only to inspections but resolution of cases.	Leadership Counsel for Justice and Accountability	2.26.16	See Chapter 6 - Housing Plan, Program 19, pages 6-14, 6-15. Commitment added.	Y



#	Ch.	Comment	Name	Date	Response	HE Change (Y/N)
65	6	The Draft HE fails to adequately identify or mitigate drought-related barriers to housing opportunity. The Final HE should include a program committing the City to review and revise City regulations, including the Development Code, to ensure appropriate management of the City's water resources to ensure that housing needs are met for all income groups. Currently the Development Code requires a water assessment for projects consisting of 500 or more dwelling units, but does not include a similar requirement for smaller subdivisions or multifamily and affordable housing units.	Leadership Counsel for Justice and Accountability	2.26.16	The Fresno General Plan Master EIR analyzed the water needs for Fresno for the horizon year of 2035 and beyond. A host of general plan policies and mitigation measures assure that adequate water supply will be available to accommodate the City's projected growth. In addition, all proposed developments, whether for 1 dwelling unit or 500, are reviewed by the City's Public Utilities Department to ensure that the project can be adequately served.	N
66	6	The Draft HE fails to address habitability barriers to housing opportunity. Program 14 commits the City only to completing inspections without any promise of enforcement and to the development of recommendations by a Code Enforcement Task Force without any promise of adoption of those recommendations.	Leadership Counsel for Justice and Accountability	2.26.16	See Chapter 6 - Housing Plan, Program 19, pages 6-14, 6-15. Commitment added with regard to resolving cases. With regard to adoption of future code enforcement provisions, city staff cannot commit the City Council to actions that would require it's approval. Staff can only present items for Council's consideration.	Y
67	6	The City's Task Force must include current and/or past rental housing tenants and must work with local CBOs to identify resident leaders interesting in serving and provide the technical support and /or translation services for non-English speakers to meaningfully participate in the decision-making processes. Public notice of the Task Force meeting should also be provided.	Leadership Counsel for Justice and Accountability	2.26.16	The task force was convened by the Mayor and is not subject to the Brown Act.	N

#	Ch.	Comment	Name	Date	Response	HE Change (Y/N)
68	6	The Draft should include a program to revise the City's municipal code to allow the public to enforce habitability provisions.	Leadership Counsel for Justice and Accountability	2.26.16	State law already allows this.	N
69	6	Program 17 does not include any commitment to specific actions by the City that will result in a beneficial impact in the planning period. Program 17 commits the City only to "investigate participation" in the Franchise Tax Board Building Code Program as a tool to reduce the number of substandard units in the City. Program should have a date by which the City will make a formal determination as to whether it will participate in the program and must also commit to proactive code enforcement as opposed to a complaint-based system.	Leadership Counsel for Justice and Accountability	2.26.16	As the Program notes (now Program 22 on page 6-16) the city will investigate participation in this program by January 2017.	
70	6	The HE Draft analysis of Special Needs Populations Housing is inadequate, specifically:	Leadership Counsel for Justice and Accountability	2.26.16		N
71	6	The Draft does not adequately identify and respond to the housing needs of large households	Leadership Counsel for Justice and Accountability	2.26.16	Chapter 6 - Housing Plan, Programs 5: Housing Funding Sources, 6: Strengthening Partnerships with Affordable Housing Developers; and 7: Special Needs Housing, together define the city's strategy for facilitating more affordable housing in a holistic way for special needs groups.	
72	6	The Draft fails to respond to the needs of female-headed households	Leadership Counsel for Justice and Accountability	2.26.16	Chapter 6 - Housing Plan, Programs 5: Housing Funding Sources, 6: Strengthening Partnerships with Affordable Housing Developers; and 7: Special Needs Housing, together define the city's strategy for facilitating more affordable housing in a holistic way for special needs groups.	Y

#	Ch.	Comment	Name	Date	Response	HE Change (Y/N)
73	6	The Draft fails to provide housing assistance opportunities for undocumented families	Leadership Counsel for Justice and Accountability	2.26.16	Chapter 6 - Housing Plan, Programs 5: Housing Funding Sources, 6: Strengthening Partnerships with Affordable Housing Developers; and 7: Special Needs Housing, together define the city's strategy for facilitating more affordable housing in a holistic way for special needs groups.	Y
74	6	The Draft fails to identify or respond to linguistic, cultural and residency status barriers to affordable housing	Leadership Counsel for Justice and Accountability	2.26.16	Chapter 6 - Housing Plan, Programs 5: Housing Funding Sources, 6: Strengthening Partnerships with Affordable Housing Developers; and 7: Special Needs Housing, together define the city's strategy for facilitating more affordable housing in a holistic way for special needs groups.	Y
75	6	The Draft fails to examine or address the housing needs of residents of mobile homes	Leadership Counsel for Justice and Accountability	2.26.16	No specific housing needs of mobile home residents have been brought forward in the Housing Element process aside from the cost of land and possible sewage issue. The cost of land is beyond the scope of local government to control. Any code enforcement issues related to fixed items on the site under local building permit control would be addressed by code enforcement. Most issues however, including a sewage issue, are controlled by the State of California Department of Housing and Community Development for Mobile Home Parks. Contact 800-952-5275, 916-255-2501 for more information.	N
76	6	The city must evaluate barriers to affordable housing and fair housing associated with the Development Code, specifically the provision in Article 15-2201 (D) in which the adoption of any inclusionary zoning is conditioned upon an update of the General Plan	Leadership Counsel for Justice and Accountability	2.26.16	The city's housing plan, as set out in Chapter 6 of the Housing Element, currently does not include an inclusionary zoning provision. However, the city is facilitating mixed-income housing through several programs in the Housing Element. For example, to facilitate production of housing for lower income households, 3,516 additional units of capacity affordable to lower income households were added to the sites inventory in the revised public draft. In addition, Program 4 provides TOD Height and Density bonuses to developments proposed near public transit services. Programs 5, 6, and 7 will assist in identifying funding assistance for development of mixed-income neighborhoods and developments accommodating persons with special housing needs, and partnering with affordable housing developers to attract affordable housing developments. These are some, but not all of the ways the City seeks to encourage mixed-income housing.	N

#	Ch.	Comment	Name	Date	Response	HE Change (Y/N)
77	6	<p>The Draft fails to affirmatively further fair housing, which is to take "...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..."...The Final Housing Element must include an analysis of patterns of racial and ethnic segregation, concentrated poverty, disparities in access to resources and amenities across the City and adopt policies and programs to promote housing opportunities and access to opportunity ...regardless of protected status.</p>	<p>Leadership Counsel for Justice and Accountability</p>	<p>2.26.16</p>	<p>See Figure 3-1 on page 3-18 and maps on pages 3-23 and 3-25 for a bar chart of housing densities by development areas and mapping of the sites inventory by zoning/density and racially/ethnically concentrated areas of poverty. The figure and maps show housing affordable to lower income households is distributed across most areas of the city including in north Fresno and growth areas.</p>	<p>Y</p>
78		<p>The City is currently updating its 1996 Analysis of Impediments to Fair Housing; the analysis, findings and program recommendations for the update should be incorporated into the Final Housing Element. Programs that the city should consider to that end include:</p>	<p>Leadership Counsel for Justice and Accountability</p>	<p>2.26.16</p>		

#	Ch.	Comment	Name	Date	Response	HE Change (Y/N)
79		1. Programs requiring the examination and/or adoption of possible inclusionary housing policies requiring that new development reserve a set percentage of units for housing affordable to low-income populations;	Leadership Counsel for Justice and Accountability	2.26.16	Comment noted. No Programs call for inclusionary zoning, however they do emphasize the creation of mixed income neighborhoods. The city is facilitating mixed-income housing through several programs in the Housing Element. For example, to facilitate production of housing for lower income households, 3,516 additional units of capacity affordable to lower income households were added to the sites inventory in the revised public draft. In addition, Program 4 provides TOD Height and Density bonuses to developments proposed near public transit services. Programs 5, 6, and 7 will assist in identifying funding assistance for development of mixed-income neighborhoods and developments accommodating persons with special housing needs, and partnering with affordable housing developers to attract affordable housing developments. These are some, but not all of the ways the City seeks to encourage mixed-income housing.	Y
80		2. A program for the location of development including affordable housing subsidized by state and federal funds received by the city in higher-income areas in North Fresno and in growth areas;	Leadership Counsel for Justice and Accountability	2.26.16	See Figure 3-1 on page 3-18 and maps on pages 3-23 and 3-25 for a bar chart of housing densities by development areas and mapping of the sites inventory by zoning/density and racially/ethnically concentrated areas of poverty. The figure and maps show housing affordable to lower income households is distributed across most areas of the city including north Fresno and growth areas.	Y
81		3. The creation of a local or regional source of funding for affordable housing through mechanisms such as a commercial linkage fee;	Leadership Counsel for Justice and Accountability	2.26.16	See Chapter 6 - Housing Plan, Program 5: Housing Funding Sources.	Y
82		4. Assessment of city land use policies and practices, including its 2015 Development Code, as they pertain to the City's duty to AFFH; and	Leadership Counsel for Justice and Accountability	2.26.16	This falls within the scope of the Analysis of Impediments, currently underway. Also see Chapter 6 - Program 25, Fair Housing Services, which states that the city's Analysis of Impediments will be updated by 2017.	Y
83		5. policies and programs to address disparities in access to essential infrastructure, services, amenities and opportunities between low-income and higher-income neighborhoods in Fresno.	Leadership Counsel for Justice and Accountability	2.26.16	See Chapter 6 - Housing Plan, Program 17: Infrastructure Priority Program, and Program 20, Neighborhood Infrastructure.	Y

#	Ch.	Comment	Name	Date	Response	HE Change (Y/N)
84		The Draft fails to complete required SB 244 analysis and General Plan Revisions.	Leadership Counsel for Justice and Accountability	2.26.16	All general plan revisions that are triggered by Housing Element adoption are being proposed as part of the Housing Element plan amendment, however they are not part of the Housing Element itself.	N
85	3	The Housing Element perpetuates underproduction of affordable housing (refers to last annual report); above-moderate-income housing has been overproduced and housing for lower and moderate income households has been underproduced.	P. Milrod	2.29.16	Pursuant to Government Code Sections 65580-65581, the housing element is a planning document, not a housing production document. However, to ensure that the city is facilitating the production of housing for lower income households, 3,516 additional units of capacity affordable to lower income households were added to the sites inventory in the revised public draft. Further, Program 4 provides TOD Height and Density bonuses to developments proposed near public transit services. In addition, Programs 5, 6, and 7 will assist in identifying funding assistance for development of mixed-income neighborhoods and developments accommodating persons with special housing needs, and partnering with affordable housing developers to attract affordable housing developments. These are some, but not all of the ways the City seeks to encourage production of affordable housing.	Y
86	3	The Housing Element perpetuates existing patterns of racial segregation. Suggests that maximum capacity downtown has been assumed for all housing types, but that housing affordable to low and very low income households have not been distributed into "Neighborhoods of Opportunity."	P. Milrod	2.29.16	Page 3-18 of the Revised Public Draft redline states that housing units in Downtown only comprise 8% of the sites inventory. Minimum densities for the allowed zoning have been assumed. See Figure 3-1 on page 3-18 and maps on pages 3-23 and 3-25 for a bar chart of housing densities by development areas and mapping of the sites inventory by zoning/density and racially/ethnically concentrated areas of poverty. The figure and maps show housing affordable to lower income households is distributed across most areas of the city.	Y

#	Ch.	Comment	Name	Date	Response	HE Change (Y/N)
87	3	The City must improve its public participation process. Needs to create a multi-lingual meaningful message campaign using multiple media: radio, television, community-based newsletters	P. Milrod	2.29.16	Government Code Section 65583(c)(8) requires that the city make a diligent effort to encourage public participation. See Chapter 1, Introduction pages 1-5 - 1-9 for a complete description of the outreach process and methods employed, which included trilingual (Spanish, Hmong and English) flyers distributed to the 8 schools where workshops were held, to the Fresno Bee, and to a list of approximately 500 advocates, stakeholders and interested persons. Spanish and Hmong interpreters were also provided at all community workshops held. In addition, through January and February of 2016, the city also provided for public comment on the draft Element at 19 meetings of various city commissions, such as the city council and planning commission. Future public comment opportunities will be available in March and April at commission meetings, such as the planning commission's March 30, 2016 meeting.	N
88	3	Zoned densities which effectively ensure new housing will exacerbate the already-existing racial and ethnic segregation that defines the landscape of this city - Data in Appendix B needs to be sorted and mapped by affordability/density.	P. Milrod	2.29.16	Page 3-18 of the Revised Public Draft redline states that housing units in Downtown only comprise 8% of the sites inventory. See Figure 3-1 on page 3-18 and maps on pages 3-23 and 3-25 for a bar chart of housing densities by development areas and mapping of the sites inventory by zoning/density and racially/ethnically concentrated areas of poverty. The figure and maps show housing affordable to lower income households is distributed across most areas of the city.	Y
89	3	Use information from the Industrial Compatibility study to analyze land use codes and zoning for the AI.	P. Milrod	2.29.16	Study findings not available at time of preparation of the housing element.	N

**Comments may be added to this matrix as additional comments are received.**

#	Ch.	Comment	Name	Date	Response	HE Change (Y/N)
---	-----	---------	------	------	----------	--------------------